



# REVISED ENVIRONMENTAL MANAGEMENT PROGRAMME

for  
**DOORNHOEK PV**

on

Portion 18 of Farm Doornhoek 372

In terms of the

National Environmental Management Act (Act No. 107 of 1998, as amended) & 2014 Environmental Impact Regulations

Prepared for Applicant: Doornhoek PV (Pty) Ltd

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### APPROVAL FOR RELEASE

NAME	TITLE	SIGNATURE
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- 
- <sup>1</sup> This Revised EMPr is submitted in compliance with condition 18 of the Environmental Authorisation for Doornhoek 1 PV(14/12/16/3/3/1/2548) as well as Doornhoek 2 PV (14/12/16/3/3/1/2549).

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I&AP Review and Comment

**APPLICANT:**

Doornhoek PV (Pty) Ltd

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## EMPR LEGISLATIVE REQUIREMENTS

Appendix 4 of Regulation 982 of the 2014 EIA Regulations contains the required contents of an Environmental Management Programme (EMPr). The checklist below serves as a summary of how these requirements were incorporated into this EMPr.

Requirement	Description
<p>Details of the EAP who prepared the EMPr; and;</p> <p>The expertise of the EAP to prepare an EMPr, including a curriculum vitae.</p>	<p>This EMPr was prepared by Dale Holder of Cape EAPrac (EAPASA REG # 2019/301) who has more than 19 years' experience as an Environmental Assessment Practitioner. The CV of the EAP is attached in appendix H.</p>
<p>A detailed description of the aspects of the activity that are covered by the EMPr as identified by the project description.</p>	<p>This EMP covers all aspects of the project as currently proposed for the Doornhoek PV.</p> <ul style="list-style-type: none"> <li>• PV modules and mounting structures;</li> <li>• Inverters and transformers;</li> <li>• Cabling;</li> <li>• Site and internal access roads (up to 8 m wide);</li> <li>• Auxiliary buildings (33 kV switch room, gatehouse and security, control centre, office, warehouse, canteen &amp; visitors centre, staff lockers etc.);</li> <li>• Perimeter fencing and security infrastructure;</li> <li>• Rainwater tanks;</li> <li>• Temporary and permanent laydown areas;</li> <li>• Facility substation.</li> </ul>
<p>A map at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers</p>	<p>The Final Site Layout Plan (SLP) attached in Appendix A, includes the sensitive features identified by participating specialists and indicates how these have been incorporated.</p> <p>The "exclusion areas" identified on this SLP as well as all areas outside of the perimeter fencing of the facility are considered as no go areas for construction activities.</p>
<p>A description of the impact management objectives, including management statements, identifying the impacts and risks that need to be avoided, managed and mitigated as identified through the environmental impact assessment process for all the phases of the development including –</p> <p>(i) Planning and design;</p> <p>(ii) Pre-construction activities;</p> <p>(iii) Construction activities;</p> <p>(iv) Rehabilitation of the environment after construction and where applicable post closure; and</p> <p>(v) Where relevant, operation activities.</p>	<p>Sections 1.3</p>
<p>A description and identification of impact management outcomes required for the aspects contemplated above.</p>	<p>Sections 4 -11</p>

Requirement	Description
<p>A description of the proposed impact management actions, identifying the way the impact management objectives and outcomes contemplated above will be achieved and must, where applicable include actions to –</p> <ul style="list-style-type: none"> <li>(i) Avoid, modify, remedy control or stop any action, activity or process which causes pollution or environmental degradation;</li> <li>(ii) Comply with any prescribed environmental management standards or practises;</li> <li>(iii) Comply with any applicable provisions of the Act regarding closure, where applicable; and</li> <li>(iv) Comply with any provisions of the Act regarding financial provisions for rehabilitation, where applicable.</li> </ul>	Sections 4 – 11
The method of monitoring the implantation of the impact management actions contemplated above.	Sections 4 – 11 and section 14
The frequency of monitoring the implementation of the impact management actions contemplated above.	Sections 4 – 11 and section 14
An indication of the persons who will be responsible for the implementation of the impact management actions.	Sections 4 – 11
The time periods within which the impact management actions must be implemented.	Sections 4 – 11 and section 14
The mechanism for monitoring compliance with the impact management actions.	Section 2 and 4-11
A program for reporting on compliance, considering the requirements as prescribed in the Regulations.	Section 2
<p>An environmental awareness plan describing the way –</p> <ul style="list-style-type: none"> <li>(i) The applicant intends to inform his or her employees of any environmental risk which may result from their work; and</li> <li>(ii) Risks must be dealt with to avoid pollution or the degradation of the environment.</li> </ul>	Section 5.2
Any specific information that may be required by the competent authority.	None.

# REVISED ENVIRONMENTAL MANAGEMENT PROGRAMME – Doornhoek PV

in terms of the

National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended & Environmental Impact  
Regulations 2014

## Doornhoek PV

Portion 18 of Farm Doornhoek 372

Submitted for:

### Stakeholder Review & Comment

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<b>Appendix F</b>	:	Biodiversity Walkthrough Report
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# EMPR DOORNHOEK PV

## 1. INTRODUCTION

**Cape EAPrac** has been appointed by the Applicant, Doornhoek PV (Pty) Ltd, as the independent **Environmental Assessment Practitioner (EAP)** responsible for compilation of the **Revised Environmental Management Programme (EMPr)** for the proposed Doornhoek PV facility and associated infrastructure on Portion 18 of the Farm Doornhoek 372 IP<sup>2</sup>.

It must be noted that 2 authorised projects, Doornhoek 1 PV (14/12/16/3/3/1/2548) and Doornhoek 2 PV (14/12/16/3/3/1/2549), are being developed as a single facility known as Doornhoek PV. This Revised Environmental Management Programme is applicable to the Doornhoek PV Facility consisting of both the Doornhoek 1 and Doornhoek 2 PV Projects as outlined in condition 1 of the EA's. In compliance with condition 2 and 3 of the EA's, the Holder of the EA is legally responsible for compliance with all EA conditions as well as the environmental impact management outcomes outlined in this Revised EMPr<sup>3</sup>.

The key purpose of this EMPr is to ensure that the remedial and mitigation requirements identified during the Basic Assessment Report are implemented during the lifespan of the project (design to decommissioning). The EMPr is thus a management tool used to minimise and mitigate the potential environmental impacts, while maximising the benefits.

A detailed description of the proposed project and a description of the affected environment are provided in the Environmental Impact Report (EIR) which should be referred to where necessary.

It is important that this EMPr be read in conjunction with the Generic EMPr for substation infrastructure included in Appendix B. As well as the Stormwater Management Plan and Traffic and Transportation Assessment included in appendix C and D.

### 1.1 APPROACH TO THE EMPr

This EMPr addresses the environmental management of the four key phases of the project, namely:

- The design and pre-construction phase;
- The construction phase;
- The operation phase; and
- The closure and decommissioning phase.

#### 1.1.1 Pre-construction Phase

The pre-construction phase of the development refers to the final layout design considerations and the site preparation (fine-scale design and placement, survey of development site and associated infrastructure, demarcation of no-go areas, establishment of site camp and laydown area, vegetation clearing for establishment of internal road network<sup>4</sup>).

#### 1.1.2 Construction Phase

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<sup>2</sup> In compliance with condition 4 of the EA's, all authorised activities required for the realization of the Doornhoek PV must only be carried out on this property.

<sup>3</sup> This includes any person acting on behalf of the holder of the EA, including but not limited to and agent, servant, contractor, sub-contractor, employee, consultant or person rendering a service to the holder of the EA.

<sup>4</sup> This activity is considered to form both part of the pre-construction and the construction phase

The construction phase of the development refers to the earthworks and the actual construction of the civil works (installation of the PV panel arrays, construction of internal roads, stormwater structures and auxiliary buildings and on-site substation), as well as the external infrastructure such as MV cabling, access roads and gate house. The construction phase will start with the perimeter fencing of the facility and will end with final landscaping and re-vegetation / rehabilitation of the site and surrounding areas.

### **1.1.3 Operation Phase**

The operational phase commences once the facility starts providing power into the electrical network (i.e., at Contractual Operation Date). There may be a stage where both construction and operation activities overlap i.e., occur on site at the same time. The operation phase included the monitoring and maintenance activities required for the efficient functioning of the facility (e.g., cleaning and repair of solar arrays, brush-cutting of vegetation etc.), as well as health and integrity of the surrounding environment (e.g., removal alien vegetation, management of erosion etc.).

### **1.1.4 Closure and Decommissioning Phase**

Closure and decommissioning refers to the decommissioning of the panel arrays at the end of their operational lifespan or at the end of the term of the Power Purchase Agreement (PPA). For this report, three possible scenarios are considered, namely:

- Continuation of operations under an extended PPA
- The re-use, repair &/ upgrade of the facility for alternative power generation;
- The total decommissioning of the solar facility.

## **1.2 PURPOSE**

This EMPr is relevant to the Doornhoek PV renewable energy facility (Consisting of the Doornhoek 1 and Doornhoek 2 PV Projects), and all listed and specified activities necessary for the realisation of this project.

## **1.3 OBJECTIVE**

The objective of this EMPr is to prescribe project specific and generally accepted impact management outcomes and impact management actions associated with the development of the Doornhoek PV and its associated infrastructure.

- To ensure the least possible impact to:
  - Existing infrastructure on and adjacent to the site;
  - Indigenous flora and fauna (biophysical environment); and
  - Water quality of surface and groundwater on and surrounding the site. Particularly the water quality exiting the site.
- To ensure that construction and development are undertaken with consideration to all environmental factors; and
- Where such damage occurs, provision is made for re-instatement and rehabilitation.

## **1.4 SCOPE**

The scope of this EMPr applies to all pre-construction, construction, operation and decommissioning requirements for the Doornhoek PV facility. This EMPr applies to all listed and specified activities authorised in the EA and amendments thereto that are necessary for the realisation of this project.

## **1.5 EMPR APPROVAL AND REVISIONS**

This EMPr, once approved, is a legally binding document and contravention with this document constitutes a contravention with the Environmental Authorisation.

The supplementary plans annexed to this EMPr must be read in conjunction with this EMPr.

The EMPr may however require amendment at certain stages through the lifespan of the project. The incidences which may require the amendment of this document include:

- Changes in environmental legislation;
- Results of post-construction monitoring and audit;
- Per instruction from the competent authority; and
- Changes in technology and best practice principles.

It must be noted that any amendments to the EMPr actions that do not change the impact management outcomes or objectives may be immediately affected by the holder of the EA and submitted in the next environmental audit report submitted in terms of the regulations. Any amendments to the impact management outcomes need to be formally approved by the competent authority before they can be effected.

The Impact Management Outcomes and the associated actions are included in the following sections of this EMPr:

- Pre Construction – Section 4.
- Construction – Section 5.
- Operations – Section 6
- Decommissioning and Closure – Section 13

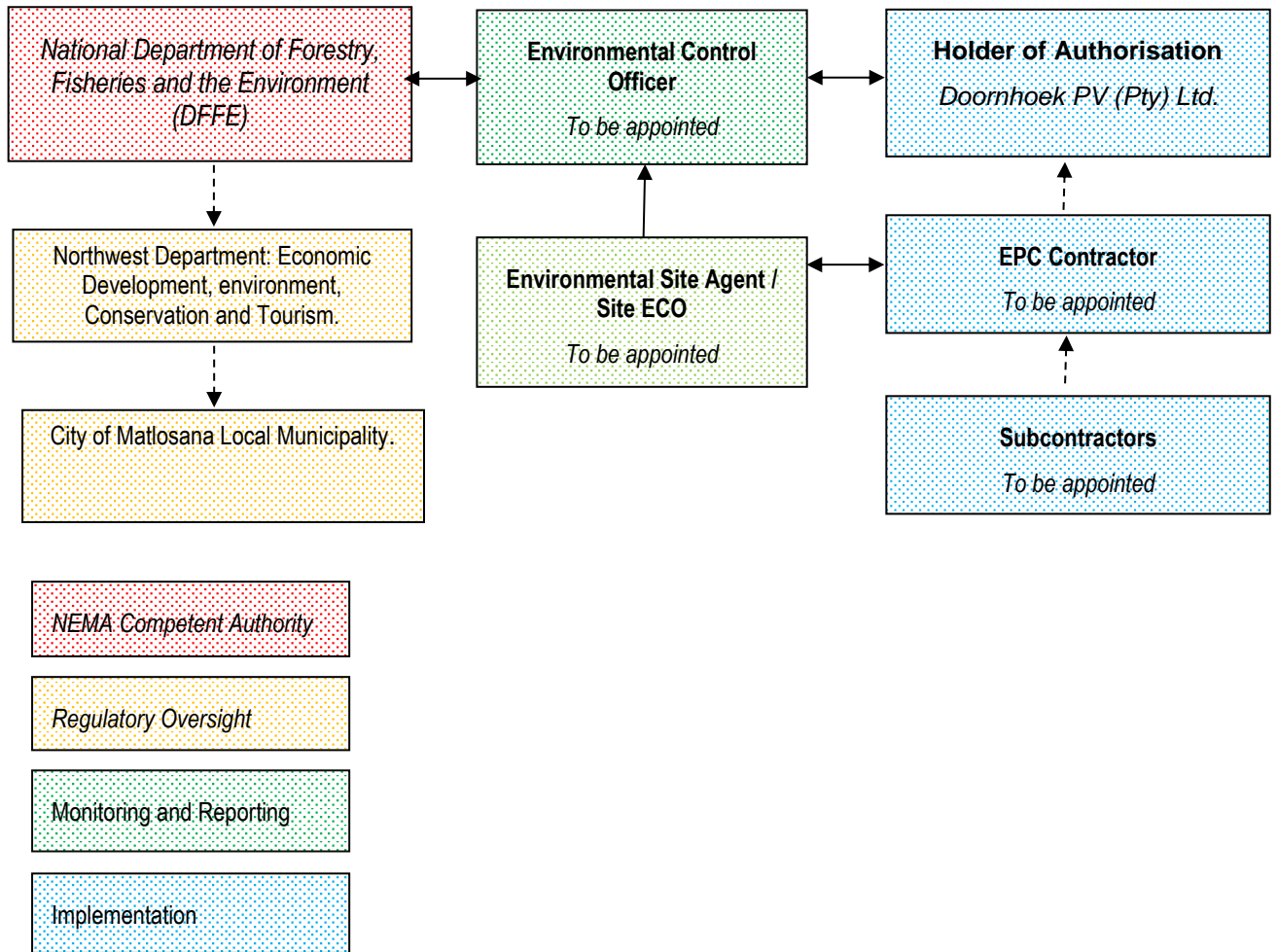
## **1.6 CONTRACTUAL OBLIGATIONS**

This EMPr must be included in ALL tender and contract documentation associated with this project. It must be noted that this EMPr is relevant and binding not only on the activities associated with the construction of the PV project, but also for all associated infrastructure authorised as part of the EA and any amendments thereto.

## **1.7 ORGANISATIONAL STRUCTURE AND RESPONSIBILITIES.**

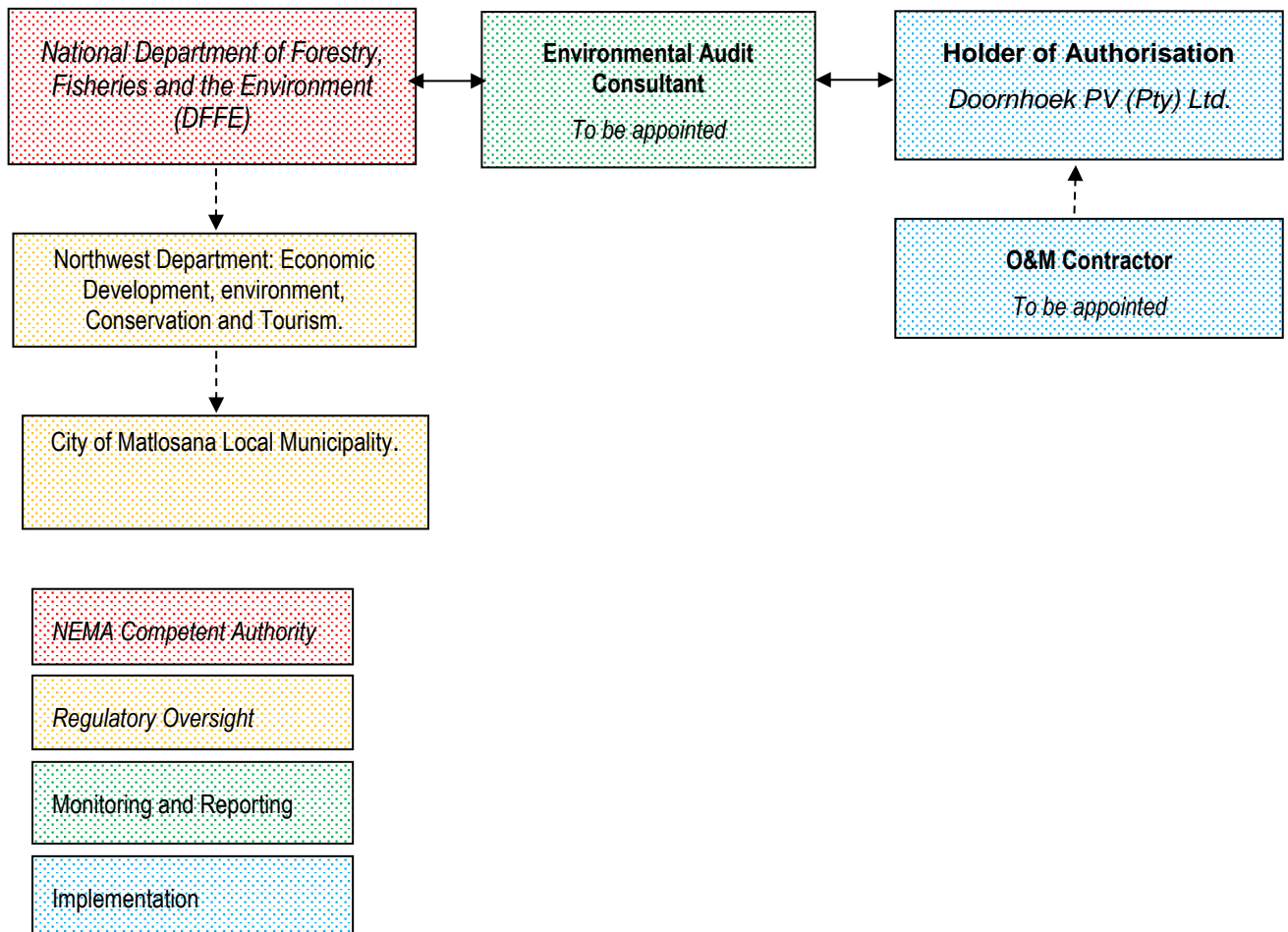
To ensure effective implementation of the EMPr, it is necessary to identify and define the organisational structure for the implementation of this document.

The proposed organisational structure during **construction** is as follows:



**Figure 1:** EMPr organisational structure during the construction phase

The proposed organisational structure during the **operation** of the facility is as follows:



**Figure 2:** EMPr organisational structure during the operation phase.

Details regarding the roles and responsibilities of the various parties in these organisational structures are included in the table below.

The effective implementation of this EMPr is dependent on established and clear roles, responsibilities and reporting lines. This table below gives guidance to the various environmental roles and reporting lines,

**Table 1:** Guide to roles and responsibilities for implementation of an EMPr

Responsible Person(s)	Role and Responsibilities
Holder of the EA <sup>5</sup>	<p><u>Role</u></p> <p>The holder of the EA is ultimately accountable for ensuring compliance with the EMPr and any conditions of approval from the competent authority.</p> <p>An Independent environmental control officer (ECO) must be contracted by the Holder of the EA to independently and objectively monitor the implementation of the EMPr according to relevant environmental legislation, and the conditions of the EA.</p>

- <sup>5</sup> In some cases the Holder of the EA and the EPC contractor may be the same entity, in which case this party will be responsible for the requirements outlined on both roles.

Responsible Person(s)	Role and Responsibilities
	<p>The holder of the EA is further responsible for providing and giving mandate to enable the ECO to perform responsibilities and must ensure that the ECO is integrated as part of the project team while remaining independent.</p> <p><u>Responsibilities</u></p> <ul style="list-style-type: none"> <li>- Be fully conversant with the conditions of the EA;</li> <li>- Ensure that all stipulations within the EMPr are communicated and adhered to by the EPC;</li> <li>- Issuing of site instructions to the EPC for corrective actions required;</li> <li>- Monitor the implementation of the EMPr throughout the project by means of site inspections and meetings. Overall management of the project and EMPr implementation; and</li> <li>- Ensure that periodic environmental audits are undertaken on the project implementation.</li> </ul>
Independent Environmental Control Officer (ECO)	<p><u>Role</u></p> <p>The Holder of the EA must appoint an ECO.</p> <p>The ECO must be independent of the holder of the EA and the EPC and have appropriate training and experience in the implementation of environmental management specifications. The primary role of the ECO is to act as an independent quality controller and monitoring agent regarding all environmental concerns and associated environmental impacts. In this respect, the ECO is to conduct monthly site inspections, attend regular site meetings, pre-empt problems and suggest mitigation and be available to advise on incidental issues that arise.</p> <p>The ECO is also required to prepare internal compliance audits (in the form of the monthly environmental control report), verifying the weekly environmental checklists submitted by the ESA.</p> <p>The ECO provides feedback to the Holder of the EA and the competent authority regarding all environmental matters. The EPC and the holder of the EA are answerable to the Environmental Control Officer for non-compliance with the Specifications as set out in the EA and EMPr.</p> <p>The ECO provides feedback to the holder of the EA, who in turn reports back to the EPC, as required. Issues of non-compliance raised by the ECO must be taken up by the holder of the EA and resolved with the Contractor as per the conditions of their contract.</p> <p>Decisions regarding environmental procedures, specifications and requirements which have a cost implication (i.e., those that are deemed to be a variation, not allowed for in the EMPr specification) must be endorsed by the Holder of the EA.</p> <p><u>Responsibilities</u></p> <p>The responsibilities of the ECO will include the following:</p> <ul style="list-style-type: none"> <li>- Be aware of the findings and conclusions of all EA conditions related to the development;</li> <li>- Be familiar with the recommendations and mitigation measures of this EMPr;</li> <li>- Manage and review all reporting undertaken by the ESA.</li> <li>- Be conversant with relevant environmental legislation, policies and procedures, and ensure compliance with them;</li> <li>- Undertake regular (at least monthly) and comprehensive site inspections / audits of the construction site according to the generic EMPr and applicable licenses in order to monitor compliance as required;</li> <li>- Compilation and administration of Environmental control reports to ensure that the environmental management measures are implemented and are effective;</li> <li>- Monitoring the performance of the Contractors and ensuring compliance with the EMPr and associated Method Statements;</li> <li>- In consultation with the holder of the EA order the removal of person(s) and/or equipment which are in contravention of the specifications of the EMPr and/or environmental licenses;</li> <li>- Liaison between the Holder of the EA, EPC contractor, authorities and other lead stakeholders on all environmental concerns;</li> </ul>



Responsible Person(s)	Role and Responsibilities
	<ul style="list-style-type: none"> <li>- Compile a monthly environmental control report highlighting any non-compliance issues as well as satisfactory or exceptional compliance with the EMPr;</li> <li>- Validating the weekly environmental checklists, which are to be prepared by the ESA;</li> <li>- Checking the ESA's record of environmental incidents (spills, impacts, legal transgressions etc.) as well as corrective and preventive actions taken;</li> <li>- Checking the EPC's public complaints register in which all complaints are recorded, as well as action taken;</li> <li>- Assisting in the resolution of conflicts;</li> <li>- In case of non-compliances, the ECO must first communicate this to the Senior Site Supervisor, who has the power to ensure this matter is addressed. Should no action or insufficient action be taken, the ECO may report this matter to the authorities as non-compliance;</li> <li>- Maintenance, update and review of the EMPr;</li> <li>- Communication of all modifications to the EMPr to the relevant stakeholders</li> <li>- Review and approval contractors' method statements.</li> </ul>
Developers Environmental Site Agent (ESA) <sup>6</sup> .	<p><b>Role</b></p> <p>The Holder of the EA or the EPC must appoint an independent ESA in terms of this EMPr. The ESA need not be independent of the holder of the EA and the EPC but must report to the ECO and have appropriate training and experience in the implementation of environmental management specifications.</p> <p>The primary role of the ESA is to act as a full-time independent quality controller and monitoring agent regarding all environmental concerns and associated environmental impacts.</p> <p>In this respect, the ECO is to conduct daily site inspections, attend regular site meetings, pre-empt problems and suggest mitigation and be available to advise on incidental issues that arise.</p> <p>The ESA is also required to undertake internal compliance audits (in the form of the weekly environmental checklist) and submit these to the ECO and the EPC contractor.</p> <p>The ESA provides feedback to the ECO, who in turn communicates with the holder of the EA and the competent authority regarding all environmental matters.</p> <p>Decisions regarding environmental procedures, specifications and requirements which have a cost implication (i.e., those that are deemed to be a variation, not allowed for in the EMPr specification) must be endorsed by the Holder of the EA.</p> <p><b>Responsibilities</b></p> <p>The responsibilities of the ESA will include the following:</p> <ul style="list-style-type: none"> <li>- Preparation of Environmental Method Statements;</li> <li>- Daily environmental monitoring;</li> <li>- Be aware of the findings and conclusions of all EA conditions related to the development;</li> <li>- Be familiar with the recommendations and mitigation measures of this EMPr;</li> <li>- Report to the ECO.</li> <li>- Be conversant with relevant environmental legislation, policies and procedures, and ensure compliance with them;</li> <li>- Compilation and administration of weekly environmental checklists to ensure that the environmental management measures are implemented and are effective;</li> <li>- Monitoring the performance of the Contractors and ensuring compliance with the EMPr and associated Method Statements;</li> <li>- Environmental induction of all staff entering the site to perform duties;</li> <li>- Maintaining a record of environmental incidents (spills, impacts, legal transgressions etc.) as well as corrective and preventive actions taken;</li> </ul>

<sup>6</sup> The developers environmental site agent can be an independent appointment to the same EAP company fulfilling the role as Environmental Control Officer – In such a case, the “Environmental Control Officer” referred to above would fulfill the Role or Principal Environmental Control Officer and the “Developers Environmental Site Agent “would fulfill the role as “Site Environmental Control Officer”.

Responsible Person(s)	Role and Responsibilities
	<ul style="list-style-type: none"> <li>- Assisting in the resolution of conflicts;</li> <li>- Reporting non-compliances to the ECO;</li> <li>- Facilitate environmental training for all personnel on the site – this may range from carrying out the training, to reviewing the training programmes of the EPC contractor;</li> </ul>
<p>EPC Contractor</p> <p><b>NB:</b> All references to the EPC contractor will include all sub-contractors responsible for any tasks in respect of the development. All Environmental Management Actions allocated to the EPC contractor will apply equally to all sub-contractors responsible for any specific task.</p>	<p><u>Role</u> The EPC Contractor or any relevant subcontractor appoints their own dEO and has overall responsibility for ensuring that all work, activities, and actions linked to the delivery of the contract are in line with the EMPr and that Method Statements are implemented as described. External contractors must ensure compliance with this EMPr while performing the onsite activities as per their contract with the Project Developer. The contractors are required, where specified, to provide Method Statements setting out in detail how the impact management actions contained in the EMPr will be implemented during the development of this facility.</p> <p><u>Responsibilities</u></p> <ul style="list-style-type: none"> <li>- project delivery and quality control for the development services as per appointment;</li> <li>- employ a suitably qualified person to monitor and report to the Project Developer's appointed person on the daily activities on-site during the construction period;</li> <li>- ensure that safe, environmentally acceptable working methods and practices are implemented, and that equipment is properly operated and maintained, to facilitate proper access and enable any operation to be carried out safely;</li> <li>- attend on site meeting(s) prior to the commencement of activities to confirm the procedure and designated activity zones;</li> <li>- ensure that contractors' staff repair, at their own cost, any environmental damage because of a contravention of the specifications contained in EMPr, to the satisfaction of the ECO.</li> </ul>

National Government, Provincial Government or Local Authorities must be granted access for the purposed of monitoring compliance with the EA or this EMPr.

## 1.8 PROPOSED ACTIVITY

The following components form part of the proposed Doornhoek PV facility.

- PV modules and mounting structures with a maximum height of 2.5m above ground level (in compliance with condition 46 of the EA's)
- Inverters and transformers;
- Cabling;
- Site and internal access roads (up to 8 m wide);
- Auxiliary buildings (33 kV switch room, gatehouse and security, control centre, office, warehouse, canteen & visitors centre, staff lockers etc.);
- Perimeter fencing and security infrastructure;
- Rainwater tanks;
- Temporary and permanent laydown areas;
- Facility substation.

The components covered by this EMPr are spatially shown on the Final Site Layout Plan Appended to this EMPr. This site layout plan is submitted along with this EMPr for approval in terms of condition 13 of the EA's

In compliance with condition 5 of the EA's, it must be noted that any changes or deviations from the project description set out in the EA, must be approved in writing by the competent authority before they can be affected.

It is envisioned that all required services (water, sewerage and waste) will be provided by the local municipality.

The main physical activities (i.e., those activities that need to be managed from an environmental perspective) that will form part of the construction phase are:

- Removal of vegetation for the proposed infrastructure;
- Excavations for infrastructure and associated infrastructure;
- Establishment of a laydown area for equipment;
- Stockpiling of topsoil and cleared vegetation;
- Transportation of material and equipment to site, and personnel to and from site;
- Construction of the solar field, overhead power line, facility substation and additional infrastructure; and
- Rehabilitation of Disturbed areas.

The following main activities will occur during the operational phase:

- Generation of electricity;
- Maintenance of the solar facility, including washing of panels;
- Management of the vegetation within the PV development; and
- Maintenance of the distribution line

In the event of decommissioning, the main aim would be to return the land to its original, pre-construction condition. Should the need for decommissioning arise (i.e., if the actual SEF becomes outdated or the land needs to be used for other purposes), the decommissioning procedures will be undertaken in line with the EMPr and any legislation or guidelines relevant at the time and the site must be rehabilitated and returned to its pre-construction state. Possible decommissioning activities will include removing the infrastructure, and implementation of mechanisms to promote the re-growth of natural vegetation. The Holder of the Environmental Authorisation is responsible for ensuring that sufficient financial provisions are in place for the Decommissioning of the Facility and the Full Rehabilitation of the total land portion.

## **2. DOCUMENT CONTROL, REPORTING AND COMPLIANCE**

To ensure accountability and effective implementation of the EMPr, a number of reporting systems<sup>7</sup>, documentation controls and compliance mechanisms must be in place for all project infrastructure as a minimum requirement.

### **2.1 DOCUMENT CONTROL AND FILING**

The holder of the EA is solely responsible for the upkeep and management of the official EMPr file. As a minimum, all documentation detailed below will be stored in the EMPr file. A hard copy of all documentation shall be filed, while an electronic copy may be kept where relevant. A duplicate file will be maintained by the ECO. The EMPr file must be always on site and available on request by the Competent Authority or other relevant authorities. The EMPr file will form part of any environmental audits undertaken as prescribed in the EIA Regulations.

### **2.2 DOCUMENTATION TO BE AVAILABLE**

At the commencement of the project the following preliminary list of documents shall be placed in the EMPr file and be accessible at all times:

- Full copy of the signed EA from the Competent Authority in terms of NEMA, granting approval for the development;
- Any Amendments of the EA from the competent Authority;

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<sup>7</sup> These reporting systems are adapted from the various generic EMPs gazetted by the Department of Forestry, Fisheries and the Environment.

- Copy of the EMPr as well as any amendments thereof;
- All method statements prepared by the EPC and submitted to the ECO for approval;
- All weekly checklists prepared by the Environmental Site Agent (ESA);
- All monthly ECO reports prepared by the ECO;
- Minutes and attendance register of environmental site meetings;
- Attendance registers of all environmental inductions;
- An up-to-date environmental incident log;
- A copy of all instructions or directives issued;
- A copy of all corrective actions signed off. The corrective actions must be filed in such a way that a clear reference is made to the non-compliance record; and
- Complaints register.

All the records relating to monitoring and auditing must be kept on site and made available for inspection to any relevant and competent authority.

### **2.3 WEEKLY ENVIRONMENTAL CHECKLIST**

The ESA is required to complete a Weekly Environmental Checklist, the format of which should be approved by the ECO, with input from the EPC and the holder of the EA.

The ESA is required to sign and date the checklist, retain a copy in the EMPr file and submit a copy of the completed checklist to the EPC and the ECO on a weekly basis. The EPC must utilise the weekly checklists to initiate any corrective actions detailed therein.

### **2.4 MONTHLY ENVIRONMENTAL CONTROL REPORT**

The ECO is responsible for compilation of the monthly ECO Report. The weekly checklists above will form the basis for the Monthly Environmental Control Reports and must be supplemented by the outcomes of the ECO inspection. The monthly Environmental Control Reports must be submitted to the following parties (in compliance with condition 29 of the EA's for Both Doornhoek 1 and Doornhoek 2):

- The Competent Authority – Director Compliance Monitoring;
- The Provincial Conservation Authority;
- The DFFE' sub-directorate, Forestry;
- The Holder of the EA;
- The EPC; and
- All attendees of Environmental Site Meetings.

Copies of all completed Environmental Control reports must be attached as Annexures to the Environmental Audit Report as required in terms of the regulations.

### **2.5 ENVIRONMENTAL SITE MEETINGS**

Minutes of the environmental site meetings shall be kept by the Holder of the EA or the EPC. The minutes must include an attendance register and will be attached to the Monthly Environmental Control Report that is distributed to attendees. Each set of minutes must clearly record "Matters for Attention" that will be reviewed at the next meeting.

### **2.6 METHOD STATEMENTS**

The method statement will be done in such detail that the ECO is able to assess whether the contractor's proposal is in accordance with the EMPr. Commencement of any specific activity may not commence until such time as the method statement for that activity is approved by both the ECO and the project manager.

The method statement must cover applicable details regarding:

- development 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 EMP; and
- any other information deemed necessary by the ECOs.

Unless indicated otherwise by the ECO, the EPC shall provide the following method statements to the ECO no less than 14 calendar days prior to the commencement date of each activity:

- Site establishment – Site Camps, Lay-down or storage areas, satellite camps, infrastructure;
- Workshop or plant emergency maintenance;
- Drilling and Piling operations
- Handling, transport and storage of Hazardous Chemical Substance's;
- Vegetation management – Protected species relocation, site clearing, alien vegetation;
- Access management – Roads, gates, crossings etc.;
- Fire plan;
- Waste management – transport, storage, segregation, classification, disposal (all waste streams);
- Social interaction – complaints management, compensation claims, access to properties etc.;
- Water – use (source, abstraction and disposal), access and all related information, crossings and mitigation;
- Emergency preparedness – Spills, training, other environmental emergencies;
- Dust and noise management methodologies;
- Fauna interaction and risk management; and
- Heritage, Archaeology and Palaeontology management.

It is the prerogative of the ECO to request additional method statements for any other aspect of the proposed development.

The ESA and ECO shall monitor and ensure that the contractors perform in accordance with these method statements. A copy of all method statements must be kept on the EMP file and appended to the Monthly ECO report on the month following their approval.

## **2.7 ENVIRONMENTAL INCIDENT LOG**

The ESA is required to maintain an up-to-date and current Environmental Incident Log (environmental diary). The Environmental Incident Log is a means to record all environmental incidents and/or all non-compliance events.

An environmental incident is defined as:

- Any deviation from the listed impact management actions (listed in this EMP) that is identified by the ESA or ECO (for example, a contractor's staff member littering or a drip tray that has not been emptied);
- Any environmental impact resulting from an action or activity by a contractor in contravention of the environmental stipulations and guidelines listed in the EMP which as a single event would have a minor impact but which if cumulative and continuous would have a significant effect (for example no toilet paper available in the ablutions); and
- General environmental information such as road kills or injured wildlife.

The ESA must record all environmental incidents in the Environmental Incident Log. All incidents regardless of severity must be reported to the ECO and the Holder of the EA. The Log is to be kept in the EMPr file (and appended to the monthly environmental control reports) and at a minimum the following will be recorded for each environmental incident:

- The date and time of the incident;
- Description of the incident;
- The name of the Contractor / subcontractor responsible;
- The significance of the incident must be noted;
- If the incident is listed as significant, a non-compliance notice must be issued, and recorded in the log;
- Remedial or corrective action taken to mitigate the incident; and
- Record of repeat minor offences by the same contractor or staff member.

## **2.8 NON-COMPLIANCE**

In response to a significant incident, re-occurring incidents or unattended incidents, a non-compliance notice will be issued to the responsible contractor by the ECO via the Holder of the EA or Project Manager. The non-compliance notice will be issued in writing; a copy filed in the EMPr file and will at a minimum include the following:

- Time and date of the non-compliance;
- Name of the contractor responsible;
- Nature and description of the non-compliance;
- Recommended / required corrective action; and
- Date by which the corrective action to be completed.

The contractors shall act immediately when a notice of non-compliance is received and correct whatever is the cause for the issuing of the notice. Complaints received regarding activities on the development site pertaining to the environment shall be recorded in a dedicated register and the response noted with the date and action taken. The ECO should be made aware of any complaints. Any non-compliance with the agreed procedures of the EMPr is a transgression of the various statutes and laws that define how the environment is managed.

Failure to redress the cause shall be reported by the ECO to the Competent Authority for them to deal with the transgression, as it deems fit, including the issue of penalties as detailed in section 21 of this EMPr. The contractor is deemed not to have complied with the EMPr if, inter alia, there is a deviation from the environmental conditions, impact management outcomes and impact management actions as approved in the EMPr.

## **2.9 CORRECTIVE ACTION RECORDS**

For each non-compliance notice issued, a documented corrective action must be recorded. On receiving a non-compliance notice from the ESA or ECO, the EPC must ensure that the corrective actions required take place within the stipulated timeframe. On completion of the corrective action the contractors Environmental Officer is to issue a Corrective Action Report in writing to the ECO.

If satisfied that the corrective action has been completed, the ECO are to sign-off on the Corrective Action Report and attach the report to the non-compliance notice in the EMPr file. A corrective action is considered complete once the report has been signed off by the ECO.

## **2.10 PHOTOGRAPHIC RECORD**

A digital photographic record will be kept by the ESA. The photographic record will be used to show before, during and post rehabilitation evidence of the site as well as in cases of damages claims if they arise. Each image must be dated, include a co-ordinate and a brief description note attached. The ESA photographic record must form part of the weekly Environmental Checklists.

The EPC shall:

- Allow the ESA and ECO access to take photographs of all areas, activities and actions.

The ESA and ECO shall keep an electronic database of photographic records which will include:

- Pictures of all areas designated as work areas, site camp, development sites and storage areas taken before these areas are set up;
- All bunding and fencing;
- Road conditions and road verges;
- Condition of all farm fences;
- Topsoil storage areas;
- All areas to be cordoned off during construction;
- Waste management sites;
- Ablution facilities (inside and out);
- All completed corrective actions for non-compliances;
- All required signage;
- Photographic recordings of incidents;
- All areas before, during and post rehabilitation; and

## **2.11 COMPLAINTS REGISTER**

The EPC shall keep a current and up-to-date complaints register. The complaints register is to be a record of all complaints received from communities, stakeholders and individuals. The Complaints Record shall:

- Record the name and contact details of the complainant;
- Record the time and date of the complaint;
- Contain a detailed description of the complaint;
- Where relevant and appropriate, contain photographic evidence of the complaint or damage (ECO / ESA to take relevant photographs); and
- Contain a copy of the ECO's written response to each complaint received and keep a record of any further correspondence with the complainant. The ECO's written response will include a description of any corrective action to be taken and must be signed by the Contractor, ECO and affected party. Where a damage claim is issued by the complainant, the ECO shall respond as described in below.

## **2.12 CLAIMS FOR DAMAGES**

If a Claim for Damages is submitted by a community, landowner or individual, the ECO shall:

- Record the full detail of the complaint as described in above;
- The EPC will evaluate the claim and associated damage and submit the evaluation to the holder of the EA for approval;
- Following consideration by the Holder of the EA the claim is to be resolved and settled immediately, or the reason for not accepting the claim communicated in writing to the claimant.

## **2.13 INTERACTIONS WITH AFFECTED PARTIES**

Open, transparent and good relations with affected landowners, communities and regional staff are an essential aspect to the successful management and mitigation of environmental impacts.

The ESA shall:

- Ensure that all queries, complaints and claims are dealt within an agreed timeframe<sup>8</sup>;
- Ensure that any or all agreements are documented, signed by all parties and a record of the agreement kept in the EMPr file and submitted to the ECO;
- Ensure that telephone numbers to register complaints are made available to all landowners and affected parties; and
- Ensure that contact with affected parties is always courteous.

## 2.14 ENVIRONMENTAL AUDITS

Internal environmental audits of the activity and implementation of the EMPr must be undertaken in the form of the monthly environmental control reports. The findings and outcomes must be included in the EMPr file and submitted to the ECO for inclusion in the environmental control report to be submitted to the competent authority on a monthly basis.

At a minimum, the monthly environmental control report is to cover the following:

- Weekly Environmental Checklists;
- Deviations and non-compliances with the checklists;
- Non-compliances issued;
- Completed and reported corrective actions;
- Environmental Monitoring;
- Results of Dust Fall out Monitoring;
- General environmental findings and actions; and
- Minutes of the Environmental Site Meetings.

In addition to the internal environmental audit (which takes place as part of the monthly environmental control report), an external audit must be undertaken:

- Within 6 months of commencement of construction activities.
- Within 30 days of completion of construction activities.
- Within 30 days of completion of rehabilitation activities.

These external audits cannot be undertaken by the ECO and must be undertaken by an external audit consultant.

Additional audits during the operational phase of the activity are to be done at the frequency determined in the regulations.

## 3. LEGISLATIVE AND POLICY FRAMEWORK

In terms of legislative provisions, this EMPr must satisfy:

- Section 24N of the NEMA, as amended;
- Appendix 4 of the NEMA EIA Regulations published in Government Notice No. R 326 of 7 April 2017. These regulations regulate and prescribe the content of the EMPr and specify the type of supporting information that must accompany the submission of the report to the authorities;
- The requirements outlined in the Environmental Authorisation and

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<sup>8</sup> This relates to complaints and claims of an environmental nature only and does not pertain to complaints and claims of any other nature.



- Gazetted generic EMPs for the power line and substation infrastructure.

**Table 2:** Compliance with Section 24N of NEMA

<b>Requirements of Section 24N of NEMA</b>	<b>Reference in this EMPr?</b>
2. The environmental management programme must contain- information on any proposed management, mitigation, protection or remedial measures that will be undertaken to address the environmental impacts that have been identified in a report contemplated in subsection 24(1A), including environmental impacts or objectives in respect of: <ul style="list-style-type: none"> <li>- planning and design;</li> <li>- pre-construction and construction activities;</li> <li>- the operation or undertaking of the activity in question;</li> <li>- the rehabilitation of the environment; and</li> <li>- closure, if applicable;</li> </ul>	Section 5,6 & 14 of this EMPr
Details of the person who prepared the environmental management programme; and the expertise of that person to prepare an environmental management programme;	Please refer to the summary page at the beginning of this report for these details.
A detailed description of the aspects of the activity that are covered by the environmental management programme;	Section 1.8
Information identifying the persons who will be responsible for the implementation of the measures contemplated in paragraph (a);	Columns in Section 5,6 and 14 of the EMPr detail the monitoring responsibility.
Information in respect of the mechanisms proposed for monitoring compliance with the environmental management programme and for reporting on the compliance;	Section 5, 6, 14 and 16
As far as is reasonably practicable, measures to rehabilitate the environment affected by the undertaking of any listed activity or specified activity to its natural or predetermined state or to a land use which conforms to the generally accepted principle of sustainable development; and	Section 8
A description of the way it intends to- <ul style="list-style-type: none"> <li>- modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation;</li> <li>- remedy the cause of pollution or degradation and migration of pollutants; and</li> <li>- comply with any prescribed environmental management standards or practices.</li> </ul>	Section 1.2 to 1.4
3. The environmental management programme must, where appropriate- <ul style="list-style-type: none"> <li>- set out time periods within which the measures contemplated in the environmental management programme must be implemented;</li> <li>- contain measures regulating responsibilities for any environmental damage, pollution, pumping and treatment of polluted or extraneous water or ecological degradation which may occur inside and outside the boundaries of the operations in question; and</li> <li>- develop an environmental awareness plan describing the manner in which- <ul style="list-style-type: none"> <li>- the applicant intends to inform his or her employees of any environmental risk which may result from their work; and</li> <li>- risks must be dealt with to avoid pollution or the degradation of the environment.</li> </ul> </li> </ul>	Sections 3 – 14 all contain the timeframes for the associated measures.
5. The Minister, the Minister responsible for mineral resources or an MEC may call for additional information and may direct that the environmental management programme in question must be adjusted in such a way as the Minister, the Minister responsible for mineral resources or the MEC may require.	Not applicable at this stage.
6. The Minister, the Minister responsible for mineral resources or an MEC may at any time after he or she has approved an application for an environmental authorisation approve an amended environmental management programme.	Not applicable at this stage.
7. The holder and any person issued with an environmental authorisation- <ul style="list-style-type: none"> <li>- must at all times give effect to the general objectives of integrated environmental management laid down in section 23;</li> </ul>	Throughout the EMPr

Requirements of Section 24N of NEMA	Reference in this EMPr?
<ul style="list-style-type: none"> <li>- must consider, investigate, assess and communicate the impact of his or her prospecting or mining on the environment;</li> <li>- must manage all environmental impacts</li> <li>- in accordance with his or her approved environmental management programme, where appropriate; and</li> <li>- as an integral part of the prospecting or mining, exploration or production operation, unless the Minister responsible for mineral resources directs otherwise;</li> <li>- must monitor and audit compliance with the requirements of the environmental management programme;</li> <li>- must, as far as is reasonably practicable, rehabilitate the environment affected by the prospecting or mining operations to its natural or predetermined state or to a land use which conforms to the generally accepted principle of sustainable development; and</li> <li>- is responsible for any environmental damage, pollution, pumping and treatment of polluted or extraneous water or ecological degradation as a result of his or her operations to which such right, permit or environmental authorisation relates.</li> </ul>	
8. Notwithstanding the Companies Act, 2008 (Act No. 71 of 2008), or the Close Corporations Act, 1984 (Act No. 69 of 1984), the directors of a company or members of a close corporation are jointly and severally liable for any negative impact on the environment, whether advertently or inadvertently caused by the company or close corporation which they represent, including damage, degradation or pollution.	Section 1.7 details the responsibility of the Project Applicant.

**Table 3:** Compliance with Appendix 4 of the 2014 NEMA EIA Regulations (as amended on 7 April 2017)

Requirement	Description
Details of the EAP who prepared the EMPr; and; The expertise of the EAP to prepare an EMPr, including a curriculum vitae.	This EMPr was prepared by Dale Holder of Cape EAPrac who has more than 16 years' experience as an Environmental Assessment Practitioner. The CV of the EAP is attached in appendix I.
A detailed description of the aspects of the activity that are covered by the EMPr as identified by the project description.	This EMP covers all aspects of the project as currently Proposed for Doomhoek PV <ul style="list-style-type: none"> <li>• PV modules and mounting structures;</li> <li>• Inverters and transformers;</li> <li>• Cabling;</li> <li>• Battery Energy Storage System (BESS);</li> <li>• Site and internal access roads (up to 8 m wide);</li> <li>• Auxiliary buildings (33 kV switch room, gatehouse and security, control centre, office, warehouse, canteen &amp; visitors centre, staff lockers etc.);</li> <li>• Perimeter fencing and security infrastructure;</li> <li>• Rainwater tanks;</li> <li>• Temporary and permanent laydown areas;</li> </ul> Facility substation. <ul style="list-style-type: none"> <li>• Own-build grid connection solution, including on site substation:</li> </ul>
A map at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers	The Site Development Plan attached in Appendix A, includes the sensitive features identified by participating specialists and indicates how these have been incorporated. The "exclusion areas" identified on this SDP as well as all areas outside of the perimeter fencing of the facility are considered as no go areas for construction activities.
A description of the impact management objectives, including management statements, identifying the impacts and risks that need to be avoided, managed and mitigated as identified through	Sections 1.3

Requirement	Description
<p>the environmental impact assessment process for all the phases of the development including –</p> <ul style="list-style-type: none"> <li>(vi) Planning and design;</li> <li>(vii) Pre-construction activities;</li> <li>(viii) Construction activities;</li> <li>(ix) Rehabilitation of the environment after construction and where applicable post closure; and</li> <li>(x) Where relevant, operation activities.</li> </ul>	
<p>A description and identification of impact management outcomes required for the aspects contemplated above.</p>	<p>Sections 4 -11</p>
<p>A description of the proposed impact management actions, identifying the way the impact management objectives and outcomes contemplated above will be achieved and must, where applicable include actions to –</p> <ul style="list-style-type: none"> <li>(v) Avoid, modify, remedy control or stop any action, activity or process which causes pollution or environmental degradation;</li> <li>(vi) Comply with any prescribed environmental management standards or practises;</li> <li>(vii) Comply with any applicable provisions of the Act regarding closure, where applicable; and</li> <li>(viii) Comply with any provisions of the Act regarding financial provisions for rehabilitation, where applicable.</li> </ul>	<p>Sections 4 - 11</p>
<p>The method of monitoring the implantation of the impact management actions contemplated above.</p>	<p>Sections 4 – 11 and section 14</p>
<p>The frequency of monitoring the implementation of the impact management actions contemplated above.</p>	<p>Sections 4 – 11 and section 14</p>
<p>An indication of the persons who will be responsible for the implementation of the impact management actions.</p>	<p>Sections 4 – 11</p>
<p>The time periods within which the impact management actions must be implemented.</p>	<p>Sections 4 – 11 and section 14</p>
<p>The mechanism for monitoring compliance with the impact management actions.</p>	<p>Section 2 and 4-11</p>
<p>A program for reporting on compliance, considering the requirements as prescribed in the Regulations.</p>	<p>Section 2</p>
<p>An environmental awareness plan describing the way –</p> <ul style="list-style-type: none"> <li>(iii) The applicant intends to inform his or her employees of any environmental risk which may result from their work; and</li> <li>(iv) Risks must be dealt with to avoid pollution or the degradation of the environment.</li> </ul>	<p>Section 5.2</p>
<p>Any specific information that may be required by the competent authority.</p>	<p>None.</p>

Other than the Section 24N and Appendix 4 requirements detailed in the table above, the applicable legislation remains the same as what was considered in the Basic Assessment Report for the Doornhoek PV and as such, it is not re-described in this EMP.



## 4. PRE-CONSTRUCTION PHASE– IMPACT MANAGEMENT OUTCOMES & ACTIONS

This section provides details on the pre-construction phase impact management outcomes and actions<sup>9</sup> that are commonly applicable to the development of a PV Energy Facility and its associated infrastructure as well as management actions outlined by participating specialists, preceding environmental process and those contained in the EA for the facility.

Each subsection includes an aspect identified for the development of the PV Energy Facility, and for each aspect a set of prescribed impact management outcomes and associated impact management actions have been identified.

The holder of the EA is ultimately responsible to ensure the implementation of these outcomes and actions.

### 4.1 PRE-CONSTRUCTION EA CONDITIONS.

The Environmental Authorisation for this development will require a number of administrative requirements that need to take place prior to commencement of construction. These must be included in the EMPr once the EA in respect of this activity is received.

### 4.2 APPOINTMENT OF ENVIRONMENTAL CONTROL OFFICER AND ENVIRONMENTAL SITE AGENT

In compliance with condition 28 of the EA's, the holder of the EA must appoint an independent Environmental Control Officer (ECO) for the construction phase of the Development.

- This ECO must be appointed prior to the commencement of any of the Authorised Activities.
- In compliance with condition 28.2, The contact details of the ECO must be submitted to the Director Compliance Monitoring at DFFE.
- The ECO must remain employed until all rehabilitation measures are completed and the site is ready for operation.

<b>Impact management outcome:</b> Independent party to ensure that the mitigation/rehabilitation. measures and recommendations referred to in the EA are implemented and reported on and to ensure compliance with the provisions of the approved EMPr.						
Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance

- <sup>9</sup> All Environmental Management Actions allocated to the EPC contractor will apply equally to all sub-contractors responsible for any specific task.

<ul style="list-style-type: none"> <li>• The ECO must be appointed prior to the commencement of any physical activities.</li> <li>• The ECO will be responsible for monitoring, reviewing and verifying compliance by the EPC Contractor with the environmental specifications of this EMPr and the conditions of the EA.</li> <li>• The appointed ECO must be independent of the EPC contractor and must be suitably qualified and have experience of environmental monitoring and control on similar scale projects.</li> <li>• The main responsibilities of the ECO include but are not limited to the following:             <ul style="list-style-type: none"> <li>- Facilitate the pre-construction environmental compliance workshop;</li> <li>- Review of documentation supplied by the ESA;</li> <li>- Be fully knowledgeable of all the licences and permits issued to the site</li> <li>- Review, maintenance and update of the EMPr;</li> <li>- Liaison between the Project Proponent, Contractors, Authorities and other lead stakeholders on all environmental concerns, including the implementation of the EMPr;</li> <li>- Compilation of monthly Environmental Control Report/s (ECR) to ensure compliance with the EMPr and authorisations. Reports should be submitted to the relevant authority on a monthly basis;</li> <li>- Monitor compliance with this EMPr;</li> <li>- Monitor compliance with the EA;</li> <li>- Monitor implementation of the mitigation and rehabilitation measures and recommendations referred to in the EA, preceding environmental assessment, participating specialists and this EMPr.</li> <li>- Recommend the issuing site instructions to the EPC contractor for corrective actions required;</li> <li>- ECO site inspections should be undertaken at least once a month to ensure compliance with the EMPr. The duration of these visits may be increased or decreased at the discretion of the ECO in consultation with the holder of the EA. The Environmental Site Agent as described below should be on site daily and be in communication with the ECO on a daily basis;</li> <li>- Attendance of regular contractors' site meetings;</li> <li>- Maintain a record of environmental incidents (e.g., spills, impacts, legal transgressions etc.) as well as corrective and preventative measures taken.</li> <li>- Maintain public complaints register in which all complaints and action taken / responses must be recorded.</li> <li>- Keep Record of all activities on site, problems identified, transgressions noted, and a task schedule of tasks undertaken by the ECO; and</li> </ul> </li> </ul>	<p>Holder of the EA</p>	<p>The holder of the EA to appoint independent ECO and ensure that ECO is suitably qualified and experienced.</p>	<p>ECO to be appointed prior to construction</p>	<p>ECO will undertake physical monitoring.</p>	<p>Monthly</p>	<p>The name and contact details of the appointed ECO to be submitted to the Director: Compliance Monitoring at DFFE.</p> <p>ECO to submit monthly Environmental Control Report to the Director: Compliance Monitoring at DFFE.</p>
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<ul style="list-style-type: none"> <li>• The holder of the EA, on advice from the ECO, has the authority to stop work on site if he / she consider that any actions of excessive non-compliance of the EMPr, authorisations or General Duty of Care are taking place.</li> <li>• The ECO must remain employed until all rehabilitation measures are completed.</li> </ul>						
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In addition to the ECO, this EMPr requires the appointment of a Environmental Site Agent (ESA) for the duration of the construction period of the project (this ESA must be appointed in the pre-construction phase, prior to the commencement of construction activities). The ESA need not be independent and can be appointed by the EPC.

**Impact management outcome:** To ensure independent full time environmental expertise on site to monitor and report on compliance

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>• The ESA must be appointed prior to the commencement of any physical activities.</li> <li>• The ESA will be responsible for daily monitoring, reviewing and verifying compliance by the EPC Contractor with the environmental specifications of this EMPr and the conditions of the EA.</li> <li>• The appointed ESA must be suitably qualified and have experience of environmental monitoring and control.</li> <li>• The main responsibilities of the ESA include but are not limited to the following:                             <ul style="list-style-type: none"> <li>- To ensure compliance with the EMPr and EA;</li> <li>- The ESA is required to be on site daily, which may be reviewed by the ECO and holder of the EA as construction requirements dictate;</li> <li>- Undertaking environmental induction of all staff;</li> <li>- Attending all on site construction meetings (including, but not limited to, technical and progress meetings);</li> <li>- Providing the ECO with a weekly environmental checklist;</li> <li>- Developing and maintaining a detailed photographic site record throughout the construction phase of the project;</li> <li>- Maintaining file records of all method statements provided by the contractors;</li> </ul> </li> </ul>	EPC Contractor	The EPC contractor to appoint independent ESA and ensure that ESA is suitably qualified and experienced.	ESA to be appointed prior to construction	ESA will undertake physical monitoring.	The ESA to monitor site daily and provide a formal report back weekly.	The name and contact details of the appointed ESA to be submitted to the Director: Compliance Monitoring at DFFE.  Weekly Environmental Checklists to be provided to the EPC and the ECO.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>- Management and ensuring timeous and effective rehabilitation of the site;</li> <li>- Maintain a record of environmental incidents (e.g., spills, impacts, legal transgressions etc.) as well as corrective and preventative measures taken. This information must also be included in the weekly reports;</li> <li>- Maintain public complaints register in which all complaints and action taken / responses must be recorded.</li> <li>- If the ESA observes non-compliance that requires a “stop work” order, the ECO must immediately be informed and will request the holder of the EA to issue such an order if necessary.                         <ul style="list-style-type: none"> <li>• The ESA must remain employed until all rehabilitation measures are completed.</li> </ul> </li> </ul>						

The ECO must have a minimum of a tertiary level qualification in the natural sciences field, as well as at least 8 years’ experience and proven competency as an ECO, with extensive experience on similar scale Developments.

The ESA must have a minimum of a tertiary level qualification, as well as at least 1 years’ experience on similar scale developments and proven competency as an ECO.

### 4.3 PRE-CONSTRUCTION ENVIRONMENTAL COMPLIANCE WORKSHOP

It is a required action that a pre-construction environmental compliance workshop be undertaken before any construction commences on site.

**Impact management outcome:** To ensure that all senior contract staff members have an in-depth knowledge of the environmental requirements for the site in terms of the EA and EMPr.



Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>• It is a required action that a pre-construction environmental compliance workshop be undertaken before any construction commences on site. This workshop can be combined with a site handover meeting but must take place before any activities take place on site and before any plant is moved onto site.</li> <li>• The purpose of this workshop is to ensure that all relevant senior personnel are familiar with the provisions of the EMP, as well as the conditions of the EA.</li> <li>• The following people must be present at this Environmental Compliance Workshop: <ul style="list-style-type: none"> <li>- The holder of the EA;</li> <li>- The ECO;</li> <li>- The EPC Contractor (including contract manager, site agent and foreman);</li> <li>- The sub-EPC contractor if appointed</li> <li>- The Electrical Contractor (including contract manager, site agent and foreman);</li> <li>- The Consulting Engineers (electrical, civil and structural, whichever applicable); and</li> <li>- Project and Asset Management.</li> </ul> </li> <li>• Provision should be made in contract and tender documentation to attend a 6-hour workshop that will be chaired by the ECO.</li> <li>• Due to covid regulations and concerns, this workshop may take place on a virtual platform or on site.</li> </ul>	Holder of the EA	<p>The holder of the EA must arrange the invites to the workshop.</p> <p>ECO to present the workshop</p>	Prior to commencement of construction.	ECO	Once off.	ECO to issue minutes of the workshop, to be included in first monthly environmental control report.

#### 4.4 PRE-CONSTRUCTION ECOLOGICAL REQUIREMENTS

In compliance with condition 52 and 54 of the EA's, it is required that, a pre-construction survey of the final development footprint must be conducted to ascertain the identity and exact numbers of individuals of protected species affected by the proposed development. A copy of this ecological walkthrough report is attached in Appendix E. No clearing of vegetation may take place until such time as all required permits in terms of both the provincial and national legislation are in place.

The ESA should be present for the site preparation and initial clearing activities to ensure the correct demarcation of no-go areas and supervise any flora relocation and faunal rescue activities that may need to take place during the site clearing. The EPC is required to comply with all permit conditions.

#### 4.5 WATER CONSERVATION.

It is important that the proposed water conservation infrastructure for both the construction as well as operational phases is considered at the pre-construction phase prior to any procurement taking place.

**Impact management outcome:** To ensure design criteria promotes sustainable resource use.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<p>All buildings should be fitted with rainwater collection and storage systems to supply water to the taps and toilets in these buildings, as well as any outdoor requirements (landscaping, washing etc).</p> <p>All toilets (excluding temporary toilets) should be fitted with dual flush systems<sup>10</sup>.</p> <p>All taps to be installed in the control / substation / workshop buildings must be fitted with low-flow faucets.<sup>11</sup>.</p> <p>The design of any temporary water reservoirs for construction water should have the smallest practically possible surface area to reduce evaporation. Under no circumstances will the discharge of treated water, wastewater or effluent be allowed.</p>	Holder of the EA	The design engineers must consider all relevant resource conservation measures in the design phase of the development	Prior to commencement of construction.	ECO / ESA	During and on completion of all associated building infrastructure on site.	Monthly ECO Report.

#### 4.6 AVIFAUNAL MANAGEMENT

To reduce impact on the Avifaunal Component of the site, the following management actions take place during the pre-construction phase of the development.

- <sup>10</sup> Conservative estimates have shown that a saving of more than 22 000 litres per household (this could apply to the workshops that are occupied by day and night staff) can be achieved annually with the installation of dual flush toilets (Aquanotion, 2008).
- <sup>11</sup> Low flow faucets use aerators to reduce the flow of the water. These can either be built into the faucet or added as an aftermarket product. The faucets in bathrooms should have a peak flow of less than 10 litres per minute.

Impact	Mitigation/Management Objectives and Outcomes	Mitigation/Management Actions	Monitoring		
			Methodology	Frequency	Responsibility
<b>Avifauna: Entrapment</b>					
Entrapment of medium and large terrestrial birds between the perimeter fences, leading to mortality.	Prevent mortality of avifauna	A single perimeter fence should be used <sup>12</sup> . No electrified wires should be within 300m of the ground. Protect remaining habitat within the farm portion.	Design the facility with a single perimeter fence or with two fences at least 4 metres apart.	Once-off during the planning phase.	Project Developer

## 5. CONSTRUCTION PHASE – IMPACT MANAGEMENT OUTCOMES AND ACTIONS

This section provides details on the construction phase impact management outcomes and actions<sup>13</sup> that are commonly applicable to the development of a PV Energy Facility and its associated infrastructure as well as management actions outlined by participating specialists, EAP and those contained in the EA for the facility.

Each subsection includes an aspect identified for the development of a PV Energy Facility, and for each aspect a set of prescribed impact management outcomes and associated impact management actions have been identified.

The holder of the EA is ultimately responsible to ensure the implementation of these outcomes and actions.

The signed method statements prepared by the EPC contractor to achieve these environmental management outcomes must be appended to this EMP as Appendix N<sup>14</sup> and kept on record in the EMP file.

### 5.1 CONSTRUCTION PHASING

There are a number of important aspects of the construction phasing that must be implemented to ensure that the potential impact on the environment is kept to a minimum. The EPC contractor must implement the following requirements regarding phasing, when developing the construction programme. This construction programme must be approved by the holder of the EA with input from the ECO.

- <sup>12</sup> A fence consisting of an outer diamond mesh fence and inner electric fence with a separation distance of approximately 100mm would not pose any risk of entrapment for large terrestrial species and can be considered a single fence.
- <sup>13</sup> All Environmental Management Actions allocated to the EPC contractor will apply equally to all sub-contractors responsible for any specific task.
- <sup>14</sup> Method statements only to be appended once they are approved by the ECO.

- The main access road, perimeter fence and internal road network to access the panel arrays should be established first and then all vehicular movement must be restricted to within this road network - This will minimise the impact of construction traffic on the undeveloped portion of the property. The only vehicles allowed to move off this road network are those needed to install the PV Mounting structures (i.e., Drills and Piling machines).
- Sites that will be temporarily disturbed by the construction activities (i.e., Temporary access, material loading, temporary storage, turning circles, etc.) must also be included in the road access network.

## 5.2 ENVIRONMENTAL AWARENESS AND TRAINING

It is a required action that the ESA, in consultation with the EPC, shall ensure that all construction workers receive an induction presentation, as well as on-going environmental education and awareness, on the importance and implications of the EMPr, EA and the environmental requirements they prescribe.

The ESA must keep records of all environmental training sessions, including names, dates and the information presented. Details of the environmental induction are also to be included in the weekly environmental checklists and monthly environmental control reports.

**Impact management outcome:** All onsite staff are aware and understand the individual responsibilities in terms of this EMPr.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>• All staff must receive environmental induction training prior to undertaking any activities on site;</li> <li>• The EPC contractor must provide 24h notice to the ESA to arrange a suitable time for the ESA to present the induction training;</li> <li>• Refresher environmental awareness training is available as and when required;</li> <li>• All staff are aware of the conditions and controls linked to the EA and within the EMPr and made aware of their individual roles and responsibilities in achieving compliance with the EA and EMPr;</li> <li>• The EPC contractor must erect and maintain information posters at key locations on site, and the posters must include the following information as a minimum:               <ul style="list-style-type: none"> <li>- Safety notifications;</li> <li>- Faunal Occurrences and risks;</li> </ul> </li> </ul>	EPC Contractor and ESA	<p>ESA to present a pre-prepared environmental induction to all staff prior to them undertaking any activities on site.</p> <p>EPC to ensure that all environmental awareness posters are in place at a minimum of 2 locations on site and</p>	Throughout construction period	ESA	Weekly as part of the weekly environmental checklist.	Signed environmental induction attendance registers to be appended to weekly environmental checklist and monthly environmental control report.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>- Photographic plates of all listed and protected flora;</li> <li>- Hydrocarbon Spill management and correction and</li> <li>- Waste Management.</li>   <li>• Environmental awareness training must include as a minimum the following:               <ul style="list-style-type: none"> <li>- Description of significant environmental impacts, actual or potential, related to their work activities;</li> <li>- Mitigation measures to be implemented when carrying out specific activities;</li> <li>- Environmental emergency preparedness and response procedures;</li> <li>- No Go Areas</li> <li>- Procedures to be followed when working near or within sensitive areas;</li> <li>- Wastewater management procedures;</li> <li>- Water usage and conservation;</li> <li>- Solid waste management procedures;</li> <li>- Sanitation procedures;</li> <li>- Fire prevention;</li> <li>- Faunal conflicts and</li> <li>- Vegetation management and protected &amp; listed flora.</li> </ul> </li> <li>• The EPC contractor must provide translation services to Ensure that the environmental induction be translated into the relevant languages.</li> </ul>		<p>that these posters are maintained.</p> <p>ESA to attend toolbox talks at least once a week, where an environmental topic is presented (this topic should be linked to current environmental concerns on the site at that stage)</p>				

### 5.3 DEMARCATION OF NO-GO AREAS

In compliance with condition 40 of the EA's It is required that all areas outside of the physical development footprint are to be demarcated as no-no go areas and access to these areas restricted. All construction activities must be restricted to demarcated areas to restrict the impact on sensitive environmental features. The impact management actions detailed below will help in achieving this end.

**Impact management outcome:** To ensure the protection of all the natural areas, sensitive features and buffer areas outside of the physical development footprint

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>In compliance with condition 45 of the EA's, the near in tact Vaal – Vet Sandy Grassland must be treated as a no go area and appropriately demarcated as such.</li> <li>The exact footprint of the construction area, including panel foundations and all roads (including access, haul and internal roads which must make use of the final road layout) and infrastructure are to be surveyed and pegged before any physical construction commences on site.</li> <li>To ensure effective demarcation of no-go areas, the construction of the perimeter fence should be the first activity that takes place on site.</li> <li>All sensitive features as identified by specialists or ECO within the footprint must be demarcated for exclusion.</li> <li>Appropriate signage is to be placed at all No-Go Areas</li> <li>The contractor, in conjunction with the ECO and ESA, must walk the areas determined and mark the full extent of the area to be disturbed (allowing sufficient space for the construction activity);</li> <li>All areas beyond these demarcated areas are considered as “no-go” areas;</li> <li>Construction staff must be briefed as part of the environmental induction on the requirements regarding the no-go areas; and</li> <li>Any protected trees or plants that are to remain within the development footprint are to be physically demarcated.</li> </ul>	<p>EPC Contractor</p>	<p>The EPC contractor to ensure that all no-go demarcations are in place and maintained for the duration of the contract.</p> <p>The ESA to ensure that compliance with the no-go policy forms part of the environmental induction.</p> <p>ESA to monitor compliance with no-go areas.</p>	<p>Survey and pegging to commencement of construction.</p> <p>Formal perimeter fence to be constructed in parallel to site establishment</p>	<p>ESA / ECO</p>	<p>ESA to monitor Daily.</p> <p>ECO to monitor Monthly.</p>	<p>Weekly environmental checklists.</p> <p>Monthly environmental control reports.</p>

**5.4 ESTABLISHMENT OF CONTRACTORS SITE CAMP AND TEMPORARY LAYDOWN AREA.**

No temporary site camps are allowed outside of the development footprint.

The position of the contractors site camp and temporary laydown area must as be shown in the approved site layout plan. It must be noted that the contractors site camp and laydown area are temporary areas for use during the duration of construction. These areas must be rehabilitated on completion of construction as detailed in section 5.20 below. A permanent laydown area not exceeding 1 Hectare may remain for the duration of the operational phase of the project.

**Impact management outcome:** To ensure that the high impact activities that typically take place in a contractor’s site camp / laydown area are restricted to a predefined area that does not contain any sensitive features and is rehabilitated on completion of construction.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>• The Contractors Site Camp and Temporary Laydown must be situated within the development area in the position identified in the approved Site Layout Plan</li> <li>• No temporary site camps will be allowed outside of the development footprint;</li> <li>• Any necessary plant rescue within the site camp and temporary laydown must be undertaken prior to the stripping of topsoil.</li> <li>• Topsoil from the site camp and temporary area must be stripped and stockpiled for re-use during rehabilitation. This must be done prior to levelling and placement of gravel;</li> <li>• The site camp must be suitably fenced off;</li> <li>• All construction material must be stored in the site camp, unless otherwise approved by the ECO. This may exclude PV panel mounting structures and panel components which will be stored at each installation point, as per the manufacturer plans;</li> <li>• No personnel may overnight in the site camp, except in the case of security personnel;</li> <li>• Fires for cooking and/or heating are only allowed within the site camp after consultation with the Health and Safety Representative;</li> <li>• Fuel and other chemicals may only be stored in the camp site;</li> <li>• Storage of waste and waste management must take place within the site camp and must be removed on a regular basis.</li> <li>• Temporary waste pick up points in the field must be moved to the site camp on a daily basis;</li> <li>• The site camp must be provided with sufficient ablution facilities (chemical toilets and potable water) of which the content must be disposed of regularly and at the suitable facilities.;</li> <li>• Any security lighting must be restricted to the Site Camp and Laydown area and no security lighting may be placed in the field;</li> <li>• Lighting during both the construction as well as operational phase of the development must be a low-pressure sodium or Led type, preferably yellow or warm white;</li> </ul>	EPC Contractor	<p>The EPC contractor to provide method statement for site camp and temporary laydown establishment.</p> <p>The ESA and ECO to monitor compliance with site camp and laydown requirements.</p> <p>ECO to sign off on final rehabilitation of the site camp and temporary laydown area.</p>	Site camp to be established prior to delivery of materials and plant (with the exception of plant and material required for the establishment of the perimeter fence)	ESA / ECO	ESA to monitor Daily. ECO to monitor Monthly.	Weekly environmental checklists. Monthly environmental control reports.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>All security lighting should be attached to motion sensors and be dark sky friendly<sup>15</sup>; and</li> <li>On completion of construction, the site camp and temporary laydown area must be rehabilitated as directed.</li> </ul>						

## 5.5 MANAGEMENT OF TOPSOIL

Topsoil from all excavations and construction activities must be salvaged and reapplied during reclamation.

In terms of best practice and for rehabilitation purposes, it is essential that at least 300mm layer of topsoil from the building and road footprints (i.e., the on-site substation, auxiliary buildings, contractor's site camp and temporary laydown area) be stripped and stockpiled prior to the commencement of construction activities in each area. Topsoil should not be stripped from the development footprint below the solar arrays except where trenching for cabling is required (in which case topsoil should be placed on the opposite side of the trench from the subsoils and placed back in the same trench when cables are covered up).

**Impact management outcome:** To ensure that the handling of topsoil does not result in the pollution or loss of the resource.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>The EPC must ensure sufficient topsoil is reclaimed to provide for rehabilitation of temporary disturbed areas as well as for long term storage for rehabilitation post operations.</li> </ul>	EPC Contractor	The EPC contractor to provide method statement for topsoil management.	Prior to construction activities in	ESA/ ECO	ESA to monitor Daily.	Weekly environmental checklists.

- <sup>15</sup> In order to achieve this, all lighting should only be on when needed, only light the area that needs it, be no brighter than necessary, minimize blue light emissions and be fully shielded (pointing downward).



Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>• A minimum 300mm layer of topsoil must be stripped from the access, internal and perimeter roads, on-site substation, auxiliary buildings, contractors site camp and temporary laydown area;</li> <li>• The topsoil stockpile sites must be approved by the ECO and may not be within any sensitive areas as defined by the ECO;</li> <li>• Topsoil stockpiles may not obstruct natural water pathways and drainage channels.</li> <li>• The topsoil may not be stockpiled within any of the remaining natural areas (i.e., any open spaces between modules). An existing disturbed area within or adjacent to the laydown areas should rather be chosen for this purpose;</li> <li>• The topsoil stockpiles must be protected from erosion and dust as indicated by the ECO and this EMPr;</li> <li>• The topsoil stockpiles must be clearly demarcated to avoid contamination;</li> <li>• No topsoil may be mixed with subsoil;</li> <li>• No topsoil may be used as bedding material for cable trenches;</li> <li>• Topsoil stockpiles must not exceed 2m in height and stockpiles older than 6 months must be enriched before they are re-used.</li> <li>• The topsoil must be replaced into disturbed areas (road verges, cable trenches and contractors site camp) on completion of construction;</li> </ul>		<p>The ESA and ECO to advise on the placement of topsoil stockpiles.</p> <p>The ESA and ECO to monitor compliance.</p> <p>ECO to sign off on final rehabilitation of the site camp and temporary laydown area.</p>	each specific area.		ECO to monitor Monthly.	Monthly environmental control reports.

## 5.6 WATER SUPPLY

This section is specific to water supply during the construction phase. Water supply for the washing of panels is discussed under the operational phase requirements.

**Impact management outcome:** To ensure water used during construction is lawfully and sustainably utilised.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>The EPC contractor must ensure that all water sources utilised are lawful.</li> <li>The EPC Contractor must ensure a supply of water is available on site for sanitation, drinking, dust suppression and all construction activities.</li> <li>The EPC Contractor must ensure that water supplied for drinking water is of potable standards.</li> <li>Water used for dust suppression on gravel roads must be of a quality compliant with the General Special Effluent Standards (31/03/2009): Temperature: max.25°C, pH: between 5.5 &amp; 7.5 and conductivity: not be increased more than 15% above the intake water &amp; not exceed 250 milli-Siemens per metre (determined at 25°C).</li> <li>No chemically treated or wastewater may be used for dust suppression.</li> <li>Should any temporary water storage reservoirs need to be constructed for the purposes of construction, these must be positioned within the footprint of the development in a position agreed to with the ECO. Sufficient mechanisms to prevent fauna entrapment must be implemented to the satisfaction of the ECO.</li> <li>Carry out Environmental Awareness Training with a discussion on water usage and conservation – This should form part of the Environmental Induction of all construction staff.</li> <li>The EPC contractor must maintain records of all water usage (via metering and / or water tuck logs) for the duration of the construction phase.</li> </ul>	EPC Contractor	<p>The EPC contractor to provide method statement for Water Supply.</p> <p>The EPC Contractor must supply records of tests undertaken on drinking water to show that it is within potable standards (these tests should be done on a three-monthly basis or anytime the water source changes)</p> <p>The EPC to measure (internally) PH, TDS and Conductivity of all water sources on a weekly basis.</p>	<p>Lawfulness and quality testing need to take place prior to construction.</p> <p>Remaining actions applicable for the duration of the construction phase.</p>	<p>EPC Contractor to provide initial and 3 monthly quality test results to ESA.</p> <p>EPC Contractor to supply weekly tests to ESA.</p> <p>Water usage records to be provided by EPC contractor on a weekly basis.</p> <p>ESA / ECO to review results and provide recommendations.</p>	<p>3 Monthly for Potability tests.</p> <p>Weekly for internal testing</p>	<p>Weekly environmental checklists.</p> <p>Monthly environmental control reports.</p>

## 5.7 VEGETATION CLEARING

The objective of mitigation for any development is to firstly avoid and minimise impacts on vegetation where possible and where these cannot be completely avoided, to compensate for the negative impacts of the development on vegetation and faunal habitats, and to maximise re-vegetation and rehabilitation of

disturbed areas. This section deals with the management of impacts associated with the clearing of vegetation. Please refer to the section below for details regarding the rehabilitation and restoration of affected areas after completion of the construction activities.

Some loss of vegetation is an inevitable consequence of the construction of PV facilities, and vegetation clearing required for the laydown area, roads, buildings etc. could impact listed plant species, as well as high-biodiversity plant communities. Vegetation clearing will also lead to habitat loss for fauna and potentially the loss of sensitive faunal species, habitats and ecosystems.

The environmental impact management actions detailed in this section as well as those in the previous section on demarcation of no-go areas will help achieve this end.

It must be noted that no vegetation clearing may occur until such time as permits for the removal of provincially protected species as well as species protected in terms of the National Forest Act are in place.

**Impact management outcome:** To ensure that vegetation is lawful, minimised and restricted to the development footprint.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>• Vegetation clearing can only commence once:                             <ul style="list-style-type: none"> <li>- All necessary permits are in place,</li> <li>- Plant Rescue has been undertaken,</li> <li>- Development footprint has been Demarcated</li> </ul> </li> <li>• Vegetation clearing must be kept to a minimum and restricted to the following areas:                             <ul style="list-style-type: none"> <li>- Internal Road Network,</li> <li>- Perimeter Road,</li> <li>- Inverter / Transformer Stations,</li> <li>- Laydown Area,</li> <li>- Site Camp and</li> <li>- Building Footprints</li> </ul> </li> <li>• For the PV Array, the underlying grass/ sedge layer should be left intact (albeit trampled by construction activities) and only the larger woody plants cleared or trimmed.</li> <li>• All areas to be cleared should be clearly demarcated, prior to the commencement of clearing activities;</li> </ul>	EPC Contractor	The EPC contractor to provide method statement for vegetation clearing activities.	Throughout the duration of construction.	ESA / ECO	Daily	Weekly environmental checklists.  Monthly environmental control reports.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>Vegetation cleared / removed as part of the site clearing activities must be stockpiled for use during the re-vegetation and rehabilitation stage for brush-packing. The location of the vegetation stockpile can be in the same area as the topsoil stockpile, as designated in consultation with the ECO;</li> <li>Only those individuals of protected plant species directly within the development footprint should be cleared. Those which can be safely left intact (e.g., below or between the solar panel arrays) must not be disturbed;</li> <li>Any vegetation clearing that needs to take place as part of maintenance activities (during construction and operation phases) should be done in an environmentally friendly manner, using the most effective methodology suited to the target species (herbicides and/or manual clearing).</li> </ul>						

### 5.8 TRENCHING AND CABLING

Electric cables required to connect the inverters to the on-site switching station (i.e., AC cables) within the boundaries of the development must be installed underground, within or parallel to the internal road network and/or paths between the panel rows, as far as possible. Preference should be given to mounting the DC cabling to the panel arrays, although it is understood that there will also be limited trenching associated with the DC cabling.

Cable trench excavation, cable laying and backfill must be carried out in a systematic and continuous operation, minimising the length of trench open at any one time in order to reduce the risk of runoff or faunal entrapment. Cable trenches must be backfilled in such a manner as to prevent the trench from acting as a ditch or a conduit for water flow.

**Impact management outcome:** To ensure that trenching activities are spatially restricted and do not result in loss or contamination of topsoil resources.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>Trenching shall be kept to a minimum through the use of single trenches for multiple service provision (including communication cabling and AC cabling in the same trenches);</li> </ul>	EPC Contractor	The EPC contractor to provide method	Throughout the	ESA and ECO	Daily	Weekly environmental checklists.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>• Open trenches to be closed as quickly as possible to prevent faunal entrapment and erosion;</li> <li>• The planning and selection should be done in approximation to the SDP and cognisance shall be given to minimising the potential for soil erosion;</li> <li>• Trench routes with permitted working areas shall be clearly defined and marked with prior to excavation;</li> <li>• The stripping and separation of topsoil and subsoil shall occur on separate sides of the excavated trench and replaced in the same order (i.e., topsoil on top);</li> <li>• Trench lengths shall be kept as short as practically possible before backfilling and compacting;</li> <li>• The ECO may require the planting of additional indigenous vegetation along trench routes in order to speed up rehabilitation (particularly in areas that may be prone to erosion);</li> <li>• Open trenches must be inspected daily for faunal entrapment (small mammals and reptiles), which are to be removed before backfilling of the trenches;</li> <li>• Trenches shall be backfilled to the same level as (or slightly higher to allow for settlement) the surrounding land surface to minimise erosion. Excess soil shall be stockpiled in an area designated by the ECO.</li> <li>• Topsoil may not be used for bedding or blanket material in trenches.</li> </ul>		statement trenching activities.	construction phase			Monthly environmental control reports.

**5.9 DRILLING AND RAMMING OPERATIONS**

It is envisioned that drilling and ramming will be the preferred method of installing the panel support structures / sub-structures. The following actions must be implemented in this regard.

**Impact management outcome:** To ensure that installation of the sub-structures do not cause pollution or undue mechanical damage to the environment.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>The plant required for the installation of the sub-structures (i.e., the trackers and module mounting structures) is the only plant that is allowed to leave the internal road network.</li> </ul> <p>The contractor shall submit a method statement detailing his proposals to prevent pollution (from hydraulic fluids, fuel or oil leaks) during ramming operations. This shall be approved by the Employers Representative and the ECO prior to the onset of any ramming operations;</p> <ul style="list-style-type: none"> <li>The contractor shall take all reasonable measures to limit dust generation as a result of drilling and ramming operations (also see section below addressing management of dust);</li> <li>Noise and dust nuisances shall comply with the applicable standards according to the Occupational Health and Safety (Act No. 85 of 1993) as well as the dust control regulations;</li> <li>Other than the known acceptable impact from trampling, any areas damaged by the ramming and associated activities shall be rehabilitated by the contractor to the satisfaction of the ECO.</li> </ul>	EPC Contractor	The EPC contractor to provide method statement drilling and ramming operations.	Throughout the construction phase	ESA and ECO	Daily	Weekly environmental checklists.  Monthly environmental control reports.

### 5.10 FENCING

During construction it will be necessary to fence in the Contractor's Site Camp (to avoid theft of construction equipment and materials) and the PV Laydown Area/s (to avoid theft of the solar panels and associated infrastructure). This temporary fencing will be restricted to these areas and be removed at the end of the construction phase. The total footprint of the facility will be fenced with a permanent perimeter electrified fence to protect the operational assets.

Electric fencing should not have any strands within 30cm of the ground (to allow for the movement of small mammals and reptiles).

**Impact management outcome:** To ensure that fencing protects project assets and the environment while limiting impact on faunal passages.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>The establishment of the perimeter fence should be the first activity that takes place on site, as this serves to demarcate the total disturbance footprint.</li> <li>Any sensitive features within the project footprint should be temporarily fenced prior to commencement of construction (refer to above section on the demarcation of no-go areas). This temporary fencing must be replaced with permanent fencing prior to the completion of the construction phase.</li> <li>Temporary storage ponds and topsoil stockpile should be temporarily fenced.</li> <li>The perimeter security fencing should be constructed in a manner which allows for the passage of small and medium sized mammals, at strategic places, such as areas of dense vegetation</li> <li>In accordance with the EA, electrified strands should not be within 30cm of the ground.</li> <li>Only the facility itself should be fenced-off.</li> <li>Other than the fencing around the site camp / laydown area and operational buildings. No lighting may be placed on the perimeter security fencing.</li> <li>The final fencing plan should be submitted to the ECO for comments and approval.</li> </ul>	EPC Contractor	<p>Implementation of the actions herein.</p> <p>EPC contractor to submit final fencing plan to the ECO for approval.</p>	Throughout the construction phase	ESA and ECO	Daily	<p>Weekly environmental checklists.</p> <p>Monthly environmental control reports.</p>

### 5.11 CONSTRUCTION VEHICLES AND TRAFFIC MANAGEMENT PLAN

Construction vehicles carrying materials to the site, should avoid using roads through densely populated areas as to not disturb existing retail and commercial operations. It is important that a permit for all abnormal loads be obtained from provincial government.

During the EIA for this project, JG Afrika prepared a traffic impact assessment (Attached to this EMPr). This document with the general management of traffic access in terms of the access to the site and management of abnormal loads etc. The EPC contractor must comply with the management requirements detailed in these documents as well as those below:

**Impact management outcome:** To minimise the impact on the road network from dust and noise pollution as well as the transport of materials and staff to site.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>• Stagger component delivery to site</li> <li>• The use of mobile batch plants and quarries near the site would decrease the impact on the surrounding road network</li> <li>• Dust suppression must take place on main access road</li> <li>• Reduce the construction period as far as possible</li> <li>• Maintenance of gravel Roads</li> <li>• Apply for abnormal load permits prior to commencement of delivery via abnormal loads</li> <li>• Assess the preferred route (from port of entry to site) and undertake a 'dry run' to test</li> <li>• Staff and general trips should occur outside of peak traffic periods as far as possible.</li> <li>• Any temporary accesses needed for delivery of large plant and equipment (i.e., plant that cannot pass underneath the MV powerlines entering Manganore Substation must:                         <ol style="list-style-type: none"> <li>1. Be utilised in such a manner as not to trigger any listed activities in terms of the 2014 EIA regulations.</li> <li>2. Must be done with the permission of the affected landowner.</li> <li>3. Be fully rehabilitated as outlined in section 5.20 after use.</li> </ol> </li> </ul>	<p>Holder of the EA and EPC Contractor</p>	<p>Implementation in compliance with the actions defined. Implementation of the measures. Implementation of the measured identified in the TIA's.</p> <p>Regular monitoring of road surface quality.</p> <p>Apply for prior to commencement of construction</p>	<p>Throughout the construction phase</p>	<p>ESA and ECO</p>	<p>At commencement of construction</p> <p>Daily</p>	<p>Weekly environmental checklists.</p> <p>Monthly environmental control reports.</p>

This following section provides additional management actions specifically with regards to management of construction vehicles in respect of bio-physical impacts.

Signs must be placed along construction roads to identify speed limit, travel restriction and other standard traffic control information. Furthermore, all construction vehicles should adhere to a low-speed limit to avoid collisions with susceptible faunal species. The following environmental management actions are required.

**Impact management outcome:** To ensure that construction traffic does not cause faunal fatalities, nor undue damage to vegetation or pollution of the environment.



Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>• The designated access to the site must be established and clearly signposted prior to physical construction commencing on site.</li> <li>• Speed limits for main access road should be set at 50km per hour.</li> <li>• Speed limits for internal roads must be set at 25km per hour.</li> <li>• Speed control signage to be placed at intervals along the access road, at the entrance to the site and at intervals along the internal road network.</li> <li>• Temporary signage to be in place for the construction phase. This signage to be replaced with permanent signage for the operational phase.</li> <li>• Other than vehicles and plant required for the drilling and ramming operations, no vehicles or plant may leave the access, or internal road network (except when within the site camp and laydown area)</li> <li>• Dust control (as described below) must be implemented the full length of the access road and on all main internal haul roads.</li> <li>• Any faunal fatalities because of vehicles and plant must be reported to the ESA within 1 hour of the incident.</li> </ul>	EPC Contractor	Implementation in compliance with the actions defined.	Throughout the construction phase	ESA and ECO	Daily	<p>Weekly environmental checklists.</p> <p>Monthly environmental control reports.</p>

## 5.12 CONSTRUCTION WASTE

In compliance with condition 59 of the EA's, an integrated waste management approach must be implemented that is based on waste minimisation and must incorporate reduction, recycling and re-use options where appropriate. Where solid waste is disposed of, such disposal shall only occur at a landfill licenced in terms of section 20(b) of the National Environmental Management Waste Act, 2008 (Act 59 of 2008).

It is proposed that the local municipality will provide services in terms of waste removal and sewage for the construction phase of the proposed project. However, should the municipality not have adequate capacity available for the handling of waste and sewage, then the EPC Contractor must make use of private contractors to ensure that the services are provided. The EPC Contractor must also ensure that adequate waste disposal measures are implemented by obtaining waste disposal dockets / slips of all waste and sewage that is removed from site.

**Impact management outcome:** To promote an integrated waste<sup>16</sup> management approach and ensure the management of waste during the construction phase is both lawful and sustainable.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>• All recyclable material (such as module packaging, packaging strips, pallets etc) must be recycled and may not be disposed of as part of the normal waste stream.</li> <li>• A dedicated waste management area should be set up in the contractors site camp / laydown area. This waste management area must as a minimum:                             <ul style="list-style-type: none"> <li>- Be clearly demarcated and sign posted</li> <li>- Be wind and scavenger proof;</li> <li>- Include separation of waste streams (Recyclable waste, General Waste, Construction Rubble and Hazardous Waste);</li> <li>- Be maintained in a neat and tidy state with waste regularly removed.</li> </ul> </li> <li>• The EPC Contractor must provide the ESA with a Waste Management register / report on a weekly Basis. This register / report must include as a minimum:                             <ul style="list-style-type: none"> <li>- Records of all waste volumes for waste stream,</li> <li>- Proof of all volumes of recycling,</li> <li>- Disposal slips for all waste transported to a landfill,</li> <li>- Disposal slips for all hazardous waste,</li> </ul> </li> <li>• All hazardous waste (including chemicals, bitumen, fuel, lubricants, oils, contaminated soil from hydrocarbon spills, paints etc.) shall be disposed of at an approved / registered hazardous-waste landfill site. The Contractor shall provide disposal certificates to the ECO.</li> <li>• All Hazardous waste must be temporary stored in sealed waterproof containers and may not be stored on site for longest than 30 days.</li> <li>• Used oil and grease must be removed from site to an approved used oil recycling company.</li> </ul>	<p>EPC Contractor</p>	<p>The EPC contractor to provide method statement for waste management.</p>	<p>Throughout the construction phase</p>	<p>ESA and ECO.  EPC Contractor to provide records of all waste volumes and disposal slips on a weekly basis.</p>	<p>Daily</p>	<p>Weekly environmental checklists.  Monthly environmental control reports.</p>

• <sup>16</sup> Waste in this instance excludes excess overburden from excavations.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>• Under NO circumstances may any waste be spoiled on the site.</li> <li>• Where possible, the routine maintenance of construction plant should take place off-site. Where such maintenance must occur, it must be done in the site camp on an impermeable surface with a sump to collect any oil spills.</li> <li>• Temporary waste receptacles in the field must be removed to the dedicated waste management area before the end of each working day.</li> <li>• Ensure that no waste materials or sediments are left in the surrounding drainage lines (because of the construction).</li> <li>• Wastewater must be collected and disposed of at a suitable licenced disposal facility. Proof of disposal (i.e., waste disposal slips or waybills) should be retained on file for auditing purposes</li> </ul>						

### 5.13 FUEL AND CHEMICAL STORAGE

The above ground storage of fuel is subject to authorisation in terms of the National Environmental Management Act (NEMA EIA regulations) if more than 30m<sup>3</sup> is stored on site at any one time. The environmental authorisation for this development does not include authorisation for the storage of more than 30 cubic metres of fuel.

The temporary storage of hazardous or toxic materials / liquids (chemicals, fuels, lubricants and oils) must comply with legislation and the actions in the table below must be implemented.

**Impact management outcome:** To ensure lawful fuel storage that does not cause soil and water pollution.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>• Temporary fuel storage must take place within the contractors site camp and laydown area in an area approved by the ECO;</li> <li>• No storage of fuel may take place on any other portion of the site;</li> <li>• All hazardous materials should be stored in the appropriate manner to prevent contamination of the site. Any accidental chemical, fuel and oil spills that occur at the site should be cleaned up immediately in the appropriate manner, as related to the nature of the spill.</li> <li>• Mobile fuel units used to refuel plant on site must make use of drip trays when refuelling;</li> <li>• Storage facilities may not be located within 60m of any freshwater resources where there is a potential for any spilled fuel to enter the resource;</li> <li>• Fuel storage facilities should be located on flat ground. No cut and fill should take place immediately on or adjacent to fuel storage areas;</li> <li>• All storage tanks should be double lined and be ISO 9001 certified;</li> <li>• All storage tanks must be enclosed by bund walls;</li> <li>• Bund walls must be constructed to contain at least 110% of the total capacity of the storage tanks;</li> <li>• Bund walls must be constructed of impermeable material or lined to ensure that petroleum products cannot escape;</li> <li>• A suitable material should be placed in the base of the bund walls to soak up any accidental spillages;</li> <li>• The tanks should be locked and secured when not in use;</li> <li>• Automatic shut-off nozzles are required on all dispensing units;</li> <li>• Storage tanks should be drained within one week of completion of activities (only unused fuel can be used by the contractor on other work sites or returned to the supplier). If the construction program extends over the builder's shutdown, the contractor must ensure that storage tanks are emptied prior to this period;</li> <li>• All storage tanks, containers and related equipment should be regularly maintained to ensure safe storage and dispensing of material. The engineer is to sign off on the condition and integrity of the storage tanks;</li> <li>• Defective hoses, valves and containment structures should be promptly repaired;</li> </ul>	EPC Contractor	The EPC contractor to provide method statement for chemical and fuel storage.	Throughout the construction phase	ESA and ECO.  EPC Contractor maintain a fuel and chemical register and provide this to the ECO on a monthly basis.	Daily	Weekly environmental checklists.  Monthly environmental control reports.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>Vehicle and equipment fuelling should be undertaken on a hard impermeable surface, over drip pans or bund walls to ensure spilled fuel or toxic liquids is captured and cleaned up;</li> <li>The area must be totally rehabilitated on completion of the contract and all contaminated material must be carefully removed and disposed of at a licensed dumping site for that purpose; and</li> <li>Spill kits must be made available on-site for the clean-up of spills. A minimum of 2 spill kits must be in the contractors site camp. Spill kits must also be available in the field within 500m of any drilling and ramming operations.</li> </ul>						

#### 5.14 NOISE MANAGEMENT

Although the proposed development is located outside of an urban area, the following noise management actions are applicable to the construction phase of the development due to its proximity to farm homesteads.

The Contractor shall furthermore be responsible for compliance with the relevant legislation with respect to noise inter alia Section 25 of ECA (73 of 1989) and standards applicable to noise nuisances in the Occupational Health and Safety Act (No. 85 of 1993).

**Impact management outcome:** To ensure nuisance from noise and vibration does not occur.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>It is recommended that noise generation be kept to a minimum and that construction activities be confined to normal working hours (07:00 - 17:00 on Monday to Saturday). Should the Contractor wish to deviate from these work hours, approval must be granted by the Holder of the EA,</li> <li>The following noise reduction actions in respect of plant should be implemented: <ul style="list-style-type: none"> <li>- Provide baffle and noise screens on noisy machines as necessary;</li> </ul> </li> </ul>	EPC Contractor	As per the stated actions	Throughout the construction phase	ESA and ECO	Daily	Weekly environmental checklists.  Monthly environmental control reports.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>- Provide absorptive linings to the interior of engine compartments;</li> <li>- Ensure machinery is properly maintained (fasten loose panels, replace defective silencers);</li> <li>- Switch off machinery immediately when not in use; and</li> <li>- Reduce impact noise by careful handling.</li> </ul>						

### 5.15 CONCRETE MANAGEMENT

Proper concrete management is of utmost importance. Concrete works are likely to be limited to the construction of the on-site sub-station and auxiliary buildings and are not likely to be extensive (the preferred alternative for the panel support structures will make use of a technology that does not require concrete footings, due to rammed piles/earth screws/rock anchors). However, in instances where rammed piles/earth screws or rock anchors will not be practically possible and for other concrete work associated with the substation and inverter stations, the following actions in terms of concrete management should take place.

Cement powder has a high alkaline pH that may contaminate and adversely affect both soil pH and water pH negatively. A rapid change in pH can have consequences on the functioning of soil and water organisms, as well as on the botanical component.

The use of ready-mix trucks delivering concrete directly to site is recommended and mass batching of concrete on site should be limited as far as possible.

**Impact management outcome:** To ensure that the handling of concrete does not result in pollution of soil or water resources.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>• Trucks should deliver pre-mixed concrete to the site and pour the concrete directly into the prepared excavations.</li> <li>• When concrete trucks have unloaded, there is a requirement to wash out the inside of the concrete drum. Water can be provided to the trucks for this purpose (at the discretion of the contractor). Concrete suppliers may NOT dispose of this wash water anywhere on site. Trucks should return to their depot for this purpose.</li> </ul>	EPC Contractor	The EPC contractor to provide method statement for all on site concrete batching.	Throughout the construction phase	ESA and ECO	Daily	Weekly environmental checklists.  Monthly environmental control reports.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>• Any spillages of concrete outside of the excavations (including haulage routes) must be cleaned up immediately by the supplier.</li> <li>• Where small batching of concrete or plaster takes place on site, the following actions must be implemented:                             <ul style="list-style-type: none"> <li>- Concrete batching may only take place in areas approved by the ECO (preferably in the Site Camp);</li> <li>- Concrete mixing must take place on batching plates unless it is on an area that is to be hard surfaced as part of the development;</li> <li>- Equipment (wheelbarrows, shovels etc) must be washed into a lined settling pond;</li> <li>- Once the settling ponds dry out, the concrete must be removed and dispatched to a suitable disposal site. Ideally, all concrete batching should take place on an area that is to be hard surfaced as part of the development (building floor, road or paved area);</li> </ul> </li> <li>• To avoid resource contamination, concrete batching should not be located within 60m of any stormwater management structure.</li> <li>• If an area outside of the site camp is identified for batching it must first be approved by the ECO and all topsoil must be stripped and stockpiled for re-use.</li> <li>• Batching at satellite sites must be done on a batching plate to prevent soil contamination.</li> <li>• Empty cement bags must be treated as hazardous waste and must be treated accordingly.</li> <li>• Cement wash water may not be discharged into the environment.</li> </ul>						

**5.16 FIRE MANAGEMENT AND PROTECTION**

As required in the veld and fire management act, it is the landowner’s responsibility to develop and maintain firebreaks as well as be sufficiently prepared to combat veld fires. This requirement will fall on the lawful user of the land in respect of the PV Development.

The PV development site is arid, with sparse vegetation cover and fires are not a natural phenomenon in the area. However, under exceptional circumstances, such as following years of exceedingly high rainfall, sufficient biomass may build up to carry fires. Therefore, management of plant biomass within the site should be part of the management of the facility. Grazing by livestock is the simplest and most ecologically sound way to manage plant biomass and is recommended

the preferred method to manage plant biomass at the site if found to be viable. Alternative management practices can include brush cutting. Utilisation of non-selective herbicides for the management of biomass is prohibited on site. The following environmental impact management actions must be implemented with regards to fire management.

**Impact management outcome:** To reduce the risk of fire to infrastructure and environment.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>• Fires should only be allowed within fire-safe demarcated areas (and only within the site camp);</li> <li>• No fuelwood collection is allowed on-site;</li> <li>• The total removal of all invasive alien vegetation should take place to decrease the fire risk – Although there were few invasive plants identified during the environmental process, these may establish to a degree as a result of site disturbance. This must be done in accordance with the Alien Vegetation Management Plan;</li> <li>• Cigarette butts may not be thrown in the veld but must be disposed of correctly. The contractor, must designate smoking areas (in compliance with the Tobacco Products Control Amendment Act 63 of 2008) with suitable receptacles for disposal;</li> <li>• In case of an emergency, the contact details of the local fire and emergency services must be readily available;</li> <li>• Contractors must ensure that basic firefighting equipment and suitably qualified/experienced personnel are available on site at all times, as per the specifications defined by the health and safety representative / consultant;</li> <li>• The fire risk on site is a point of discussion that must take place as part of the pre-construction compliance workshop and the environmental induction training prior to commencement of construction;</li> <li>• Biomass from the removal of woody vegetation currently present on site should be chipped to reduce its flammability, and</li> </ul>	EPC Contractor	In compliance with the actions defined as well as requirements detailed in the health and safety plan.	Throughout the construction phase	ESA and ECO	Daily	Weekly environmental checklists.  Monthly environmental control reports.



Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>The contractor must also comply with the requirements of the Occupational Health and Safety Act with regards to fire protection.</li> </ul>						

### 5.17 SANITATION

The EPC must provide sanitation facilities within the construction area and along the road so that workers do not pollute the surrounding environment. These facilities must be removed from the site when the construction phase is completed. Associated waste must be disposed of at a registered waste disposal site.

**Impact management outcome:** To ensure safe and healthy sanitation for construction staff without increasing pollution risk.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<p>Portable chemical ablution facilities must be made available for the use by construction staff for the duration of the construction period. The following actions must be implemented in this regard:</p> <ul style="list-style-type: none"> <li>Toilet and washing facilities must be available to the site personnel at all times (at the site camp and in the field);</li> <li>These facilities must be situated away from freshwater resources;</li> <li>One toilet for every 15 personnel is required;</li> <li>The facilities must be serviced on a regular basis to prevent any overflow or spillage;</li> <li>The servicing contractor must dispose of the waste in an approved manner (e.g., via the municipal wastewater treatment system);</li> <li>The ECO must be provided with the service providers' details and the service schedule for the site;</li> <li>The toilets should be secured to ensure that they do not blow over in windy conditions;</li> <li>All toilet facilities must be removed from site on completion of the contract period, and;</li> </ul>	EPC Contractor	As per the stated actions	Throughout the construction phase	ESA and ECO.  The EPC Contractor to supply chemical toilet service records to the ESA on a weekly basis.	Daily	Weekly environmental checklists.  Monthly environmental control reports.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>Should the construction period be interrupted by a builder's break, the toilets should be emptied prior to the break.</li> </ul>						

Sanitation during operation is discussed separately in the sections below.

### 5.18 BLASTING ACTIVITIES

Since the PV panel mountings will be drilled / rammed into the earth and will thus not require extensive excavation for foundations, it is therefore unlikely that blasting will be required. Should blasting be required for whatever reasons, the following actions must be implemented:

**Impact management outcome:** To ensure any blasting activities do not disturb sensitive environmental nor social features.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>No blasting may take place within 50m of a borehole without approval of a suitably qualified engineering geologist. Preventative mitigation actions could include installing PVC casing and screens in potentially affected boreholes before blasting, while damaged boreholes will have to be re-drilled;</li> <li>A current and valid permit shall be obtained from the relevant authorities prior to any blasting activity;</li> <li>A method statement shall be required for any blasting related activities;</li> <li>All laws and regulations applicable to blasting activities shall be adhered to at all times;</li> <li>A qualified and registered blaster shall supervise all blasting and rock splitting operations at all times;</li> <li>The contractor shall ensure that appropriate pre-blast monitoring records are in place (i.e., photographic and inspection records of structures in close proximity to the blast area);</li> </ul>	EPC Contractor	The EPC contractor to provide method statement for blasting activities should they be needed.	Throughout the construction phase	ESA and ECO.	Daily	Weekly environmental checklists.  Monthly environmental control reports.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>• The contractor shall allow for good quality vibration monitoring equipment and record keeping on site at all times during blasting operations;</li> <li>• The contractor shall ensure that emergency services are notified, in writing, a minimum of 24 hours prior to any blasting activities commencing on site;</li> <li>• The contractor shall take necessary precautions to prevent damage to unique features and the general environment, which includes the removal of fly-rock. Environmental damage caused by blasting / drilling shall be repaired at the contractor's expense to the satisfaction of the ECO;</li> <li>• The contractor shall ensure that adequate warning is provided immediately prior to all blasting. All signals shall also be clearly given;</li> <li>• The contractor shall use blast mats for cover material during blasting. Topsoil may not be used as blast cover;</li> <li>• During demolition, the contractor shall ensure, where possible, that trees in the area are not damaged;</li> <li>• Appropriate blast shaping techniques shall be employed to aid in the landscaping of blast areas, and a method statement to be approved by the Engineer, shall be required in this regard; and</li> <li>• At least one week prior to blasting, the relevant occupants/owners of surrounding land shall be notified by the contractor and any concerns addressed. Buildings within the potential damaging zone of the blast shall be surveyed, preferably with the owner present and any cracks or latent defects pointed out and recorded either using photographs or video. Failing to do so shall render the contractor fully liable for any claim of whatsoever nature, which may arise. The contractor shall indemnify the employer in this regard.</li> </ul>						

**5.19 THEFT AND ENVIRONMENTAL CRIME**

An increase in crime during the construction phase is often a concern. In the case of this development, the risk is likely to be low due to the remote nature of the site. Theft and other crime associated with construction sites is not only a concern for surrounding residents, but also the developer and the contractor. Considering this, contractors need to be proactive in order to curtail theft and crime on and resulting from the construction site.

It is recommended that the contractor develop a jobsite security plan prior to commencement of construction. This jobsite security plan should consider protection of the construction site from both internal and external crime elements, as well as the protection of surrounding communities from internal crime elements. All incidents of theft or other crime should be reported to the South African Police Service, no matter how seemingly insignificant. A copy of the jobsite security plan should be included in the first environmental control report to be submitted to the competent authority.

It is likely that the Contractor’s Site Camp and the PV Laydown area/s will be fenced with a temporary fence to avoid theft during construction. Additional security measures during construction may include CCTV camera surveillance and security guards.

**Impact management outcome:** To ensure that activities on site do not increase the criminal activity of the area.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>• The following actions are relevant in this regard (refer to the section above for details of the facility permanent security fencing):</li> <li>• The EPC Contractor must develop a Job Site Security Plan for the project.</li> <li>• All portable construction equipment and material must be locked away within the Contractor’s Site Camp overnight and during holiday periods;</li> <li>• Fuel storages tanks must be locked when not in use;</li> <li>• All unassembled / un-installed PV materials must be locked within the fenced Laydown areas overnight and during holiday periods.</li> <li>• The minimum amount of lighting should be used at night, and this should be of the low-UV emitting kind that attracts less insects.</li> <li>• The collection, hunting or harvesting of any plants or animals at the site is strictly forbidden, and thus any person found undertaking any of these actions will be considered guilty of committing a crime. Any incidents of such crimes on nature must be reported to the ECO immediately, who will report the incident to the SAPS.</li> </ul>	EPC Contractor	Implementation of a Job site security plan to be compiled by the EPC.	Jobsite Security Plan to be prepared prior to site establishment  Throughout the construction phase	ESA and ECO.	Daily	Weekly environmental checklists.  Monthly environmental control reports.

### 5.20 REHABILITATION AND HABITAT RESTORATION

A detailed Rehabilitation and Habitat Restoration Plan must be compiled by a specialist prior to commencement of any construction activities.

One of the primary objectives of all the previously listed impact management outcomes are to avoid and reduce impact on the receiving environment, thus minimising the rehabilitation and restoration requirements on completion of construction. The EPC contractor must be mindful of this primary objective as part of all activities taking place on site.

**Impact management outcome:** To restore habitat disturbed during construction activities

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<p><b>Topsoil management</b></p> <ul style="list-style-type: none"> <li>• Effective topsoil management is a critical element of rehabilitation, particularly in arid and semi-arid areas where soil properties are a fundamental determinant of vegetation composition and abundance. Although some parts of the site consist of exposed bedrock, most parts of the site have at least some topsoil. Where any excavation or topsoil clearing is required, the topsoil should be stockpiled and later used to cover cleared and disturbed areas once construction activity has ceased.</li> <li>• Excess inert material and other disturbed areas should be reshaped to blend in with the natural contours of the area;</li> <li>• The contractor must be mindful that insufficient topsoil be available for rehabilitation purposes, additional topsoil will need to be sourced from a commercial source at a cost to the contractor.</li> <li>• Topsoil is the top-most layer (0-30cm) of the soil in undisturbed areas. This soil layer is important as it contains nutrients, organic matter, seeds, micro-organisms, fungi and soil fauna. All these elements are necessary for soil processes such as nutrient cycling and the growth of new plants. The biologically active upper layer of the soil is fundamental in the maintenance of the entire ecosystem.</li> <li>• Topsoil should be retained on site in order to be used for site rehabilitation. The correct handling of the topsoil (as detailed earlier in the report) is a key</li> </ul>	EPC Contractor	<p>Implementation of the actions detailed here.</p> <p>Provision of a sufficient budget to undertake rehabilitation activities</p>	<p>Throughout the construction phase.</p> <p>Physical rehabilitation activities to be completed prior to contractual operations date.</p>	ESA and ECO and Rehabilitation Specialist	Daily	<p>Weekly environmental checklists.</p> <p>Monthly environmental control reports.</p>

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<p>element to rehabilitation success. Firstly, it is important that the correct depth of topsoil is excavated. If the excavation is too deep, the topsoil will be mixed with sterile deeper soil, leading to reduction in nutrient levels and a decline in plant performance on the soil.</p> <ul style="list-style-type: none"> <li>• Wherever possible, stripped topsoil should be placed directly onto an area being rehabilitated. This avoids stockpiling and double handling of the soil. Topsoil placed directly onto rehabilitation areas contains viable seed, nutrients and microbes that allow it to revegetate more rapidly than topsoil that has been in stockpile for long periods.</li> <li>• If direct transfer is not possible, the topsoil should be stored separately from other soil heaps until construction in an area is complete. The soil should not be stored for a long time and should be used as soon as possible. The longer the topsoil is stored, the more seeds, micro-organisms and soil biota are killed.</li> <li>• Ideally stored topsoil should be used within a month and should not be stored for longer than three months. In addition, topsoil stores should not be too deep, a maximum depth of 1m is recommended to avoid compaction and the development of anaerobic conditions within the soil.</li> </ul> <p><b>Ripping &amp; Substrate preparation</b></p> <ul style="list-style-type: none"> <li>• Before commencement with restoration activities detailed below, all identified rehabilitation areas that are compacted as a result of construction activities must be mechanically ripped.</li> <li>• Imported gravel layers (such as in the laydown area and site camp) must be removed prior to ripping and commencing with rehabilitation.</li> </ul> <p><b>Mulching</b></p> <ul style="list-style-type: none"> <li>• Mulching is the covering of the soil with a layer of organic matter of leaves, twigs bark or wood chips, usually chopped quite finely. The main purpose of mulching is to protect and cover the soil surface as well as serve as a source of seed for revegetation purposes.</li> </ul>						

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>• During site clearing the standing woody vegetation should not be cleared and burned, removed or mixed with the soil, but should be cleared separately<sup>17</sup>. The cleared vegetation should be stockpiled and used whole or shredded by hand or machine to protect the soil in disturbed areas and promote the return of indigenous species. Where there is a low shrub or grass layer, this material can be cleared and mixed as part of the topsoil (or applied as a top mulch) as this will aid revegetation and recovery when it is reapplied.</li> <li>• All mulch should 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;</li> <li>• No harvesting of vegetation may be done outside the area to be disturbed by construction activities;</li> <li>• Brush-cut mulch should be stored for as short a period as possible, and seed released from stockpiles can also be collected for use in the rehabilitation process.</li> </ul> <p><b>Seeding</b></p> <ul style="list-style-type: none"> <li>• In some areas the natural regeneration of the vegetation may be poor and the application of seed to enhance vegetation recovery may be required as directed by the ECO.</li> <li>• Seed should be collected from plants present at the site and should be used immediately or stored appropriately and used at the start of the following wet season. Seed can be broadcast onto the soil but should preferably be applied in conjunction with measures to improve seedling survival such as scarification of the soil surface or simultaneous application of mulch.</li> <li>• Indigenous seeds may be harvested<sup>18</sup> for purposes of re-vegetation in areas that are free of alien or invasive vegetation, either at the site prior to clearance or from suitable neighbouring sites;</li> <li>• Seed may be harvested by hand and if necessary dried or treated appropriately;</li> </ul>						

• <sup>17</sup> Woody vegetation within the PV array should not be mechanically cleared, but rather slashed with a brush-cutter or by hand.  
 • <sup>18</sup> Any seed harvesting required must be done with the appropriate permits in place.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>• No seed of alien or foreign species should be used or brought onto the site.</li> </ul> <p><b>Transplants</b></p> <ul style="list-style-type: none"> <li>• Where succulent plants are available or other species which may survive translocation are present, individual plants can be dug out from areas about to be cleared and planted into areas which require revegetation. This can be an effective means of establishing indigenous species quickly, this is however unlikely to be a viable option at the current site as there are few suitable species present, but if the conditions are wet then most species have some probability of surviving.</li> <li>• Plants for transplant should only be removed from areas that are going to be cleared.</li> <li>• Perennial grasses, shrubs, succulents and geophytes are all potentially suitable candidates for transplant.</li> <li>• Transplants should be placed within a similar environment from where they came in terms of aspect, slope and soil depth.</li> <li>• Transplants must remain within the site and may not be transported off the site.</li> <li>• Some species can also grow from cuttings and branches of many succulent species can be rooted in the field.</li> </ul> <p><b>Use of soil savers</b></p> <ul style="list-style-type: none"> <li>• On steep slopes (unlikely on the development site) 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 synthetic 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.</li> <li>• 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.</li> <li>• Soil saver may be seeded directly once applied as the holes in the material catch seeds and provide suitable microsites for germination. Alternatively, fresh mulch containing seed can be applied to the soil saver.</li> </ul> <p><b>General recommendations</b></p>						



Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<p>Progressive rehabilitation is a crucial element of the rehabilitation strategy and should be implemented where feasible.</p> <ul style="list-style-type: none"> <li>• Once re-vegetated, areas should be protected to prevent trampling and erosion.</li> <li>• No construction equipment, vehicles or unauthorised personnel should be allowed onto areas that have been vegetated.</li> <li>• Where rehabilitation sites are located within actively grazed areas, they should be fenced.</li> <li>• Fencing should be removed once a sound vegetative cover has been achieved.</li> <li>• Any runnels, erosion channels or washways developing after revegetation should be backfilled and consolidated and the areas restored to a proper stable condition.</li> </ul>						

As highlighted in the introduction to this section, the most cost-effective way to reduce the cost and effort for rehabilitation is to reduce and minimise the disturbance footprint. The installation of the panel arrays without total clearing site (i.e., only the physical removal of the woody species), is the biggest benefit that can be applied in this regard.

The PV panels and roads within the development represent hard surfaces that will generate a lot of runoff. As a result, effective runoff management is essential as is an effective vegetation cover to prevent widespread erosion across the site.

### 5.21 FAUNAL MANAGEMENT

**Impact management outcome:** To reduce the direct impact on animals affected by the construction activities.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>Any animals (including snakes, tortoises and lizards) directly threatened by the clearing or construction activities should be removed to a safe location outside of the construction area by the ECO or other suitably qualified/experienced person.</li> <li>All trenches, open excavations and fence lines should be inspected daily (first thing in the morning) for any trapped fauna (particularly small mammals and reptiles). These should be removed to a safe location outside of the construction area by the ECO or other suitably qualified / experienced person.</li> <li>Faunal ladders to be installed in all temporary water storage areas.</li> <li>The development footprint may need to be flushed prior to completion of the perimeter fence to ensure that no large mammals become trapped within the development site.</li> <li>All faunal mortalities are to be reported to the ESA, who must maintain a register of faunal mortalities.</li> <li>The ESA must maintain a register of all faunal observations within the development site.</li> </ul>	EPC Contractor	Implementation of the actions detailed here.	Throughout the construction phase.	ESA and ECO.	Daily	<p>Weekly environmental checklists.</p> <p>Monthly environmental control reports.</p>

## 5.22 HERITAGE AND VISUAL MANAGEMENT

Should any archaeological sites, artefacts, palaeontological fossils or graves be exposed during construction work, work in the immediate vicinity of the find must be stopped, Heritage Western Cape must be informed, and the services of an accredited heritage professional obtained.

In compliance with condition 47 of the EA's, a row of trees around the stone house complex must be planted as a windbreak (every 5m) to retain the local landscape character of the old farm complex. Furthermore, the existing thornveld trees surrounding the PV development must be retained for visual screening and plants rescued in compliance with the plant rescue plan must be planted into this area.

**Impact management outcome:** Impact to heritage resources is minimised.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>Identify, demarcate and prevent impact to all known sensitive heritage features on site in accordance with the No-Go procedure detailed above;</li> <li>Carry out general monitoring of excavations for potential fossils, artefacts and material of heritage importance;</li> <li>All work in a specific area must cease immediately, if any human remains and/or other archaeological, palaeontological and historical material are uncovered. Such material, if exposed, must be reported to the nearest museum, archaeologist/ palaeontologist (or the South African Police Services), so that a systematic and professional investigation can be undertaken. Sufficient time must be allowed to remove/collect such material before development recommences in that area.</li> </ul>	EPC Contractor	<p>Implementation of the actions detailed here.</p> <p>Implementation of chance find procedure.</p>	Throughout the construction phase.	ESA and ECO.	Daily	<p>Weekly environmental checklists.</p> <p>Monthly environmental control reports.</p>

### 5.23 AVIFAUNAL MANAGEMENT REQUIREMENTS

In compliance with condition 17, 19.4 and 39 of the EA's, an additional pre-construction 2-3 day avifaunal survey conducted during the peak wet season and form part of the EMP. A copy of this additional survey is attached in Appendix E.

Furthermore, in compliance with condition 44.1, the EPC must undertake quarterly monitoring of the PV array area for evidence of PV collisions. This role can be delegated to the ESA for implementation.

The avifaunal specialist has recommended the following mitigation measures that must be implemented.

Avifaunal mitigation measures.	Comment / Actions
Concentrate all surface infrastructure on habitat of medium to low avifaunal sensitivity. The development footprint of the various individual facilities must be kept as small as possible and sensitive habitats must be avoided.	This has already taken place as part of the Final Site Layout Plan attached in appendix A
Where possible, existing access roads should be used and the construction of new roads should be kept to a minimum	The existing access road has been utilised for the purposes of accessing the project. See Appendix A.
Prevent an overspill of construction activities into areas that are not part of the proposed construction site - development should not interfere with the proposed Secretarybird buffer area	The Secretary Bird Buffer area has been excluded from the development footprint (see Appendix A). Refer to section 5.3 for actions associated with the demarcation of no-go areas.
Use indigenous plant species native to the study site during landscaping and rehabilitation.	Please refer to section 5.20 for associated Environmental Impact Management Actions.
All internal electrical reticulation should be placed underground, while the alignment of the power line and substation should be placed parallel to existing lines.	Already incorporated into the design – See Appendix A.

Avifaunal mitigation measures.	Comment / Actions
Apply bird deterrent devices at selective areas (for example at the corners and middle part of the facility) to the PV panels to discourage birds from colonising the infrastructure or to discourage birds from constructing nests. These could include visual or bio-acoustic deterrents such as highly reflective rotating devices, anti-perching devices such as bird guards, scaring or chasing activities involving the use of trained dogs or raptors and/or netting. Nests should be removed when nest-building attempts are noticed under the guidance of the ECO	The exact configuration of these must be determined with input from the Original Equipment Manufacturer, once the supplier is determined.
Apply bird deterrent devices to the panels at selective areas (for example at the corners and middle part of the facility) to discourage birds from colonising/colliding with the infrastructure. These could include visual or bio-acoustic deterrents such as highly reflective rotating devices, anti-perching devices such as bird guards, scaring or chasing activities involving the use of trained dogs or raptors and/or netting. An option is to employ video cameras at selected areas to document bird mortalities.	The exact configuration of these must be determined with input from the Original Equipment Manufacturer, once the supplier is determined.
Apply systematic reflective/dynamic markers to the boundary fence to increase the visibility of the fence for approaching birds (e.g. korhaan taxa) and to avoid potential bird collisions with the fence structure.	The EPC to ensure final fence design includes reflective / dynamic markers.
A management programme must be compiled to assess the efficacy of applied mitigation measures and consult or change measures to reduce on-going mortalities when detected. Additional mitigation measures should be tested or applied, especially if mortalities include birds of prey and species of conservation concern.	Please refer to the operational monitoring requirements outlined in section 6.5
The post-construction monitoring (during operation) should also quantify mortalities caused by the power line network (including the existing network). The information could then be used to inform the electrical infrastructure mortality incident register. Monitoring should run parallel with the post-construction monitoring sessions. Additional mitigation measures should be tested or applied, especially if mortalities include birds of prey and species of conservation concern.	Please refer to the operational monitoring requirements outlined in section 6.5

## 5.24 SPECIALIST MANAGEMENT REQUIREMENTS

The following section details the mitigation and management measures outlined by the participating specialist and must also be adopted and implemented during the construction phase of the development. Please note that many of these mitigations are already incorporated into the remaining sections of this EMP, but are included here for quick reference.

Mitigation
Implementation of the Stormwater Management Plan attached in appendix E12
Construction vehicles and machinery must not encroach into identified 'no-go' areas or areas outside the project footprint.

Mitigation
Topsoil (20 cm, where possible) must be collected and stored in an area of low (preferable) and medium sensitivity and used to rehabilitate impacted areas that are no longer required during the operational phase (e.g. laydown areas).
Only indigenous species must be used for rehabilitation.
Where possible, lay down areas must be located within previously disturbed sites
Employees must be prohibited from making open fires during the construction phase
Employees must be prohibited from collecting plants. It is recommended that spot checks of pockets and bags are done on a regular basis to ensure that no unlawful harvesting of plant species is occurring.
An in-situ search and rescue plan must be developed and implemented for succulents and geophytes that will be impacted by the construction of the project site.
Plant translocation to adjacent suitable habitat may only be done for species that are not range restricted and for populations that have not been quantified as regionally significant.
In such cases that this is not feasible, any requirement for translocation must be discussed with the relevant authorities prior to translocation taking place
Rehabilitation efforts must provide habitat for faunal species by placing logs and rocks at strategic sites to provide shelter for small mammals and reptiles
Construction vehicles and machinery must not encroach into identified 'no-go' areas or areas outside the project footprint.
Employees must be prohibited from making open fires during the construction phase to prevent uncontrolled run-away fires
Rehabilitate laydown areas
Use existing access roads and upgrade these where necessary
The property to the south of the project infrastructure should remain intact to ensure the continued functioning of the ecological corridor that facilitates the movement of plant and animal species
All night lighting must be minimised and if required, only down lighting must be used and placed as low as practical and low light emitting bulbs (LED's).
Vehicles and machinery must meet best practice standards this will minimise noise and vibrations.
Staff and contractors' vehicles must comply with speed limits of maximum of 40km/hr
Project must start and be completed within the minimum timeframe. i.e. may not be started and left incomplete.
ECO (or relevant person) to walk ahead of clearing construction machinery and move slow moving species, e.g. tortoises, out of harms way and into suitable neighbouring habitat.
Any faunal species that may die as a result of construction must be recorded (photographed, gps co-ord) and if somewhat intact preserved and donated to SANBI or nearest university or museum.
Any faunal species observed onsite must be recorded (photographed, gps co-ord) and loaded onto iNaturalist.
Staff and contractors are not permitted to capture, collect or eat any faunal species onsite.
No animals may be killed by any staff and/or contractors related to the project, including snakes. An individual/s must be trained in snake handling to relocate snakes.
The site must be checked regularly for the presence of alien invasive species. When alien invasive species are found, immediate action must be taken to remove them.
The prickly pears currently noted on site must be removed and disposed of.
The ECO must create a list with accompanying photographs of possible alien invasive species that could occur on site prior to construction. This photo guide must be used to determine if any alien invasive species are present
The 150m buffer around the hill due to ridgeline prominence should be retained as a No-go area. The PV layout should be amended to exclude this area. This area should be set aside for conservation with thornveld tree growth encouraged
The external 50m buffer (with respect to the PV area) should be retained as a skyline intrusion mitigation from existing trees, and planting of further screening trees.
The gum-tree windbreaks adjacent to the skyline area are key screening elements and are important in retaining the rural agricultural landscape associated with the stone house heritage. These trees also reduce skyline intrusion and massing of PV on the skyline buffer area. As such, this buffer area needs to be managed as a component of the PV project. To reduce the effects of the gum tree windbreaks creating shade/ tree fall onto the PV area, the row of trees closer to the PV area can be felled prior to development of the PV site. The row away from the PV area need to be retained for the duration of the project.

Mitigation
To reduce the visual intrusion created by the white paint required for the BESS containers, early planting of screening trees directly adjacent to the BESS area needs to be undertaken
A row of trees around the Stone House complex needs to be planted as a windbreak (every 5m) to retain the local landscape character of the old farm complex. This area can be incorporated into the administration area working within heritage building specifications.
Limit the height of the PV panels to 2.5m above ground level.
Thornveld trees surrounding the proposed PV sites should be retained for visual screening. Young thornveld trees that will be removed from the PV development area need to be relocated to the buffer area such that there are trees spaced every 20 m.
Following the removal of the vegetation, wind blown dust during construction should be monitored by the ECO to ensure that it does not become a nuisance factor to the local receptors. Should excessive dust be generated from the movement of vehicles on the roads such that the dust becomes visible to the immediate surrounds, dust-retardant measures should be implemented under authorisation of the ECO
Topsoil from the footprints of the road and structures should be dealt with in accordance with EMP.
The buildings should be painted a grey-brown colour
Fencing around the offices and laydown area should be simple, diamond shaped (to catch wind-blown litter) and appear transparent from a distance. The fences should be checked on a monthly basis for the collection of litter caught on the fence.
Fencing should be placed around the PV panels and not extend up to the boundary. Electric fencing can be used. There should be no security lighting along the fence line
Signage on the adjacent road should be moderated.
It is proposed that the access roads in close proximity to the site be investigated for rehabilitation prior to construction and be maintained during construction in order to mitigate against the possibility of damaged goods due to poor road infrastructure.
The formalisation of the site access point, will likely be a requirement as part of the wayleave approval of the local and provincial roads authorities
Adequate traffic accommodation signage must be erected and maintained on either side of the access throughout the construction period of the project.
While no construction of the PV facility occurs within the servitude, the construction and provision of internal roads that cross the servitude need to be according to Eskom wayleave requirements.
Prevent an overspill of construction activities into areas that are not part of the proposed construction site - development should not interfere with the proposed Secretarybird buffer area
Use indigenous plant species native to the study site during landscaping and rehabilitation
All internal electrical reticulation should be placed underground, while the alignment of the power line and substation should be placed parallel to existing lines.
Apply bird deterrent devices at selective areas (for example at the corners and middle part of the facility) to the PV panels to discourage birds from colonising the infrastructure or to discourage birds from constructing nests. These could include visual or bio-acoustic deterrents such as highly reflective rotating devices, anti-perching devices such as bird guards, scaring or chasing activities involving the use of trained dogs or raptors and/or netting. Nests should be removed when nest-building attempts are noticed under the guidance of the ECO.
Reduce or minimise the use of outdoor lighting to avoid attracting birds to the lights or to reduce potential disorientation to migrating birds.
Use indigenous plant species native to the study area during landscaping and rehabilitation.
Implement an additional bird survey (pre-construction surveys - see section dealing with monitoring and EMP) during the peak wet season to obtain quantified data on the occurrence or flyways of waterbird taxa. The data will enable informed decisions regarding the use of deterrent devices.
Apply bird deterrent devices to the panels at selective areas (for example at the corners and middle part of the facility) to discourage birds from colonising/colliding with the infrastructure. These could include visual or bio-acoustic deterrents such as highly reflective rotating devices, anti-perching devices such as bird guards, scaring or chasing activities involving the use of trained dogs or raptors and/or netting. An option is to employ video cameras at selected areas to document bird mortalities.
Apply systematic reflective/dynamic markers to the boundary fence to increase the visibility of the fence for approaching birds (e.g. korhaan taxa) and to avoid potential bird collisions with the fence structure.
Reduce or minimise the use of outdoor lighting to avoid attracting birds to the lights or to reduce potential disorientation to migrating birds.
All internal electrical infrastructure and cabling should be placed underground.

Mitigation
It is advised that all infrastructure be fenced to prevent cattle from accessing into the facility. Avoid the placement of cattle feedlots, kraals and watering points in close proximity to overhead electrical infrastructure. A safe distance of at least 100 m from any overhead powerline is recommended. It is advised that grazing cattle at or in close proximity to distribution lines (c. 100 m) be monitored (to avoid the risk of livestock carcasses near distribution lines, which may attract vultures and other scavenging birds and the increased the risk of collision or electrocution by overhead lines). In the event that a carcass is located, it should immediately be removed from the area.
EWT should be consulted on an appropriate pylon design to be used for the project (if pylons are to be used). In general, the proposed pylon design must incorporate the following design parameters:
The clearances between the live components should be as wide as possible within the design limitations/capabilities of the power line.
The height of the tower should allow for unrestricted movement of terrestrial birds between successive pylons.
The live components should be “bundled” to increase the visibility for approaching birds.
Bird streamers” should be eliminated by discouraging birds from perching above the conductors. In addition, conductors should be strung below the pole to avoid bridging the air gap by perching birds of prey.
Implementation of a chance find procedure for the Project;
Heritage walkdown of the final impact areas prior to construction;
Visual recommendations for the structures at DH002 as per the Visual Impact Assessment by Stead (2022) should be adhered to;
Known heritage sites (apart from DH001) in the area should be indicated on development plans and avoided during all phases of the Project.

## 6. OPERATIONAL PHASE – IMPACT MANAGEMENT OUTCOMES AND ACTIONS

This section provides details on the operational phase impact management outcomes and actions<sup>19</sup> that are commonly applicable to the operation of a PV Energy Facility and its associated infrastructure, as well as management actions outlined by participating specialists and those contained in the EA for the facility.

Each subsection includes an aspect identified for the development of a PV Energy Facility, and for each aspect a set of prescribed impact management outcomes and associated impact management actions have been identified.

The holder of the EA is ultimately responsible to ensure the implementation of these outcomes and actions.

Written notice of intent to commence operations must be submitted to the DFFE at least 14 days prior to the commencement of operations.

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- <sup>19</sup> All Environmental Management Actions allocated to the O&M contractor will apply equally to all sub-contractors responsible for any specific task.

### 6.1 CLEANING OF PV MODULES

Any rainfall on the solar panels would be welcomed due to its cleaning effect, but as mentioned before, the annual predicted rainfall is extremely low. Water for cleaning panels should take place using water from lawful sources and can be supplemented from the rainwater collection / storage systems on site. To further reduce the use of water at the solar facility, the use of alternative panel cleaning methods could be investigated.

**Impact management outcome:** To ensure that cleaning of PV modules is lawful, resource efficient and does not cause erosion or pollution of the surrounding environment.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>• Water for the cleaning of PV modules must be lawful.</li> <li>• Only clean water or biodegradable cleaning materials may be used for washing purposes.</li> <li>• Care should be taken that the wash-water does not cause any erosion (the use of labour intensive, or high pressure/low volume techniques is recommended in this regard).</li> <li>• Water used in the cleaning process is likely to encourage the growth of natural vegetation around the panel arrays and rows, which will require routine brush-cutting / trimming to avoid vegetation shading the panels, interfering with tracking mechanisms or the risk of fires. Under no circumstances should vegetation beneath or around the panel arrays and rows be cleared / removed entirely, as this will result in significant erosion and associated sandblasting of infrastructure. Due to stunted nature of the xerophytic vegetation, it is unlikely that this will need to be done often. Biomass produced from these trimming activities could be chipped and used as mulch under the PV panels (to increase stormwater infiltration and reduce erosion).</li> <li>• The management of a vegetated cover on as much of the site as possible must take place. This will reduce fugitive dust emissions and thus cleaning frequencies.</li> <li>• Where practical, adopt “dry” cleaning methods, such as dusting and sweeping the site before washing down.</li> </ul>	O&M Contractor	Implementation of the actions detailed in this section.	Throughout the Operational Phase	O&M Contractor  Audit consultant.	Daily by O&M Contractor.  Annually as part of operational environmental audits	Operational Environmental Audit Report.



Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>Low level and ongoing cleaning of PV panels over time to reduce demand on aquifers.</li> </ul>						

## 6.2 OPERATIONAL WASTE

During the operational phase of the development, the amount of waste generated is likely to be very minimal and limited to normal domestic waste generated in the office, workshop waste from maintenance activities and damaged PV modules.

It is proposed that the local municipality will provide services in terms of waste removal and sewage for the operational phase (excluding Hazardous Waste and damaged PV Modules) of the proposed project. However, should the municipality not have adequate capacity available for the handling of waste and sewage; then the O&M Contractor must make use of private contractors to ensure that the services are provided. The O&M Contractor must also ensure that adequate waste disposal measures are implemented by obtaining waste disposal docket / slips of all waste and sewage that is removed from site.

**Impact management outcome:** To promote an integrated waste<sup>20</sup> management approach and ensure the management of waste during the construction phase is both lawful and sustainable

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>Wind and scavenger proof bins must be installed at the maintenance / control buildings and on-site substation and must be emptied on a weekly basis</li> <li>All hazardous waste (including bitumen, fuel, oils, paints etc.) used during the operation and maintenance of the solar facility shall be disposed of at an</li> </ul>	O&M Contractor	Implementation of the actions detailed in this section.	Throughout the Operational Phase	O&M Contractor to implement and maintain records.	Daily by O&M Contractor. Annually / three yearly as part of	Operational Environmental Audit Report.

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- <sup>20</sup> Waste in this instance excludes excess oils that may be spilled because of transformer failure. Such an incident is discussed separately under the Hazardous Substances, Leakage and Spillage Plan below.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<p>approved/registered hazardous-waste landfill site. The contractor responsible for the disposal shall provide disposal certificates to the site manager.</p> <ul style="list-style-type: none"> <li>• Used oil and grease must be removed from site to an approved used oil recycling company.</li> <li>• Under NO circumstances may any hazardous waste be spoiled on the site.</li> <li>• The servicing of operation/maintenance vehicles may not take place on site.</li> <li>• Damaged PV modules should be stored in a designated area within the O&amp;M complex before being returned to supplier<sup>21</sup> for recycling.</li> <li>• Biomass from vegetation management activities must not be disposed of off-site but must be utilised as mulch as part of the ongoing rehabilitation<sup>22</sup>.</li> <li>• Wastewater must be collected and disposed of at a suitable licenced disposal facility. Proof of disposal (i.e., waste disposal slips or waybills) should be retained on file for auditing purposes</li> </ul>				Audit consultant.	operational environmental audits	

### 6.3 OPERATIONAL GENERAL ECOLOGY CONSIDERATIONS

This section provides general management actions to ensure that operational activities do not degrade the ecological functioning of the site.

**Impact management outcome:** Ensure that operational activities do not degrade the ecological functioning of the site.

- <sup>21</sup> Or third-party recycler.
- <sup>22</sup> This Biomass can be chipped should the volumes be high enough as to pose a fire risk.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>Dust control should be continued into operation.</li> <li>Any trimming of protected species that may establish under the modules must be done in accordance with a permit.</li> <li>Other than the maintenance of the vegetated layer under the PV modules, NO further clearing of vegetation should take place.</li> <li>Speed limits within the facility must be maintained and enforced.</li> <li>Specialist advice to be sought for the management of any fauna that establishes within the site during operations.</li> <li>The O&amp;M contractor must monitor and report any Avifaunal Mortalities as a result of collision, entrapment or electrocution by project Infrastructure.</li> </ul>	O&M Contractor	Implementation of the actions detailed in this section.	Throughout the Operational Phase	O&M Contractor to implement and maintain records.  Audit consultant.	Daily by O&M Contractor.  Annually / three yearly as part of operational environmental audits	Operational Environmental Audit Report.

#### 6.4 GENERAL OPERATIONAL MAINTENANCE

The section in the table below details general operational maintenance environmental impact management actions that are not covered in the sections above.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>Lubricants used to grease bearing of panel tracking systems should be conservatively used to avoid leakage or spills. Any leaks or spills that occur during maintenance operations must be cleaned up immediately and the contaminated soil / material disposed on at a registered disposal site for hazardous materials.</li> <li>The tracks / pathways between the PV panel rows used for cleaning and maintenance of the panels, should be maintained as single tracks and regularly brush-cut and/or mowed to allow reasonable access.</li> <li>Access roads and the internal road network must be maintained in a condition that allows for reasonable access and minimised erosion potential. All drainage, stormwater management and erosion control structures must be maintained to ensure their proper functioning.</li> </ul>	O&M Contractor	Implementation of the actions detailed in this section.	Throughout the Operational Phase	O&M Contractor to implement and maintain records.  Audit consultant.	Daily by O&M Contractor.  Annually / three yearly as part of operational environmental audits	Operational Environmental Audit Report.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>• Regular monitoring for erosion to ensure that no erosion problems are occurring at the site because of the roads and other infrastructure. All erosion problems observed should be rectified as soon as possible.</li> <li>• All maintenance vehicles to remain on the demarcated roads.</li> <li>• The conservancy tank, associated with the ablution facilities at the on-site sub-station / maintenance buildings, must be maintained in full working condition.</li> <li>• The perimeter security fence should be routinely patrolled to ensure that it still allows for the passage of small and medium sized mammals, at least at strategic places, and that the electrified strands are not causing animal electrocution.</li> <li>• No unauthorized persons should be allowed onto the site.</li> <li>• The maintenance of the transmission line infrastructure must retain the bird-friendly design features (bird-flappers and insulation). Any bird electrocution and collision events that occur should be recorded, including the species affected and the date. If repeated collisions occur within the same area, then further mitigation and avoidance measures may need to be implemented.</li> <li>• Staff present during the operational phase should receive environmental education to ensure that that no hunting, killing or harvesting of plants and animals occurs.</li> <li>• All alien plants present at the site should be controlled at least twice a year using the best practice methods for the species present.</li> <li>• Bare soil should be kept to a minimum, and at least some grass or low shrub cover should be encouraged under the panels.</li> <li>• No pets should be allowed within the solar facility.</li> </ul>						

## 6.5 AVIFAUNAL MANAGEMENT

The following avifaunal impact management actions must be implemented during the operational phase.

Impact	Mitigation/Management Objectives and Outcomes	Mitigation/Management Actions	Monitoring		
			Methodology	Frequency	Responsibility
<b>Avifauna: Displacement due to habitat transformation</b>					
Total or partial displacement of avifauna due to habitat transformation associated with the vegetation clearance and the presence of the solar PV plant and associated infrastructure.	Prevent unnecessary displacement of avifauna by ensuring that the rehabilitation of transformed areas is implemented, according to the recommendations of Avifaunal specialist study.	Implementation of the Habitat Restoration Plan	EPC or appointed contractor to provide report	Once-off Once a year As and when required	Project developer Facility Environmental Manager Project developer and facility operational manager
<b>Avifauna: Mortality due to electrocution</b>					
Electrocution of priority avifauna in the onsite substation or inverter station.	Prevention of ongoing electrocution of avifauna through reactive mitigation if necessary, depending on the gravity of the problem.	Implementation of mitigation measures such as insulation of live parts to prevent further electrocutions.	Site investigation to determine causes of the mortality. Implementation of appropriate measures e.g., insulation of live parts with appropriate products.	As and when required	Facility Environmental Manager Facility operational manager

## 7. ALIEN INVASIVE VEGETATION MANAGEMENT PLAN

In compliance with condition 16 and 19.1 of the EA's, the following alien invasive vegetation management plan must be adopted and implemented by the EPC contractor during the construction phase and by the O&M Contractor during the operational phase.

Mitigation/Management Objectives	Mitigation/Management Actions			
		Methodology	Frequency	Responsibility
<b>CONSTRUCTION PHASE</b>				
Avoid establishment and reduce the spread of alien invasive plants due to the project activities.	<ul style="list-style-type: none"> <li>Appoint a specialist or contractor to undertake a sweep and survey of the final development footprint site, with an alien invasive eradication team to remove exotic vegetation prior to the commencement of construction.</li> <li>Establish an ongoing monitoring programme for the construction phase to detect and quantify any alien</li> </ul>	<ul style="list-style-type: none"> <li>Appoint a suitable vegetation contractor to inspect the site and remove any exotic weeds prior to the commencement of construction. ECO to ensure that this is taken into consideration and implemented.</li> <li>Prepare monitoring programme which will monitor the presence of alien invasive species on the site. If any</li> </ul>	Prior to the commencement of construction Once-off	EPC Contractor / ESA and ECO

Mitigation/ Management Objectives	Mitigation/Management Actions	Methodology	Frequency	Responsibility
	species that may become established and identify the problem species (as per Conservation of Agricultural Resources Act (Act 43 of 1983) (CARA) and National Environmental Management: Biodiversity Act (Act 10 of 2004) (NEM: BA)).	alien invasive species are detected, then the distribution of these should be mapped (GPS co-ordinates of concentrations of plants). The results should be interpreted in terms of the risk posed to sensitive habitats within and surrounding the project area.		
	Ensure proper management of soil stockpiles. Do not import soil stockpiles from areas with alien plants to ensure proper management of stockpiles.	Monitor the presence of alien invasive plants during the construction phase via visual inspections and take action to remove and control these species.	On-going	ECO and EPC
	Undertake rehabilitation of disturbed areas as soon as possible after construction. Stockpile the shallow topsoil layer separately from the subsoil layers. Reinststate the topsoil layers (containing seed and vegetative material) when construction is complete to allow the plants to rapidly re-colonise the bare soil areas.	Rehabilitate disturbed areas and monitor the presence of alien invasive species on site.	On-going	ECO and EPC Contractor
	Keep clearance and disturbance of indigenous vegetation to a minimum.	Monitor and manage vegetation clearing by undertaking visual inspections to ensure minimal disturbance and to restrict activities to within demarcated areas.	On-going	ECO and EPC Contractor
	Ensure that the footprint required for the proposed project activities (such as temporary stockpiling, earthworks, storage areas, site establishment etc.) is kept at a minimum.	Verify that the proposed project area is determined and outlined prior to the commencement of the construction phase by undertaking visual inspections.	Once-off prior to construction and as required during the construction process.	ECO and EPC Contractor
	Ensure that alien invasive vegetation found on site, within the proposed project footprint, is immediately controlled and removed promptly, in a scheduled manner throughout the construction phase. The removal of alien vegetation on site during the construction phase should use registered control methods and take into consideration the Alien and Invasive Species Regulations published in terms of Section 97(1) of the NEM: BA, if applicable.	Monitor the presence of alien invasive plants during the construction phase via visual inspections and take action to remove and control these species. If any alien invasive species are detected, then the distribution of these should be mapped (GPS co-ordinates of concentrations of plants). The results should be interpreted in terms of the risk posed to sensitive habitats within and surrounding the project area. Any alien invasive should be cleared from site.	On-going	ECO and EPC Contractor
	The removed alien invasive vegetation should be immediately disposed at a suitable waste disposal facility and should not be kept on site for prolonged periods of time, as this will enhance the spread of these species.	Monitor the removal of the alien vegetation found on site via visual inspections.	As necessary during the construction phase.	ECO

Mitigation/ Management Objectives	Mitigation/Management Actions			
		Methodology	Frequency	Responsibility
	All construction machinery and plant equipment delivered to site for use during the construction phase should be cleaned in order to limit the introduction of alien species.	Clean machinery and equipment prior to the construction phase. ECO to conduct visual inspections to verify that machinery and equipment are cleaned and report any non-compliance.	Prior to the commencement of construction. As necessary during the construction phase.	ECO and EPC Contractor
<b>OPERATIONAL PHASE</b>				
Reduce the establishment and spread of alien invasive plants.  To remove exotic weeds as and when they may arise and thereby prevent alteration of local and adjacent habitat forms.	Continue with on-going monitoring programme to detect and quantify any alien species that may become established and identify the highly invasive species during the operation phase.  Immediately control any alien plants that become established using registered control methods. Use of herbicides and undertake manual removal of alien vegetation on site where this may arise. Regular address and redress of weeds identified on site by a suitable contractor. The clearance of exotic weed to be undertaken bi-annually at a minimum and on a need's basis at an intermittent level.	Annual audit of project area and immediate surroundings. If any alien invasive species are detected, then the distribution of these should be mapped (GPS co-ordinates of concentrations of plants). The results should be interpreted in terms of the risk posed to sensitive habitats within and surrounding the project area.  Monitor the use of herbicide sprays and manual removal of alien vegetation by undertaking visual inspections and reporting any non-compliance. Maintain register of weed spraying activities and ensure that herbicide use is recorded.	Annual  Bi-annually	O&M Contractor  Holder of the EA
To prevent the excessive growth and propagation of exotic weeds on disturbed lands that formed a portion of the PV facility.	All-natural areas must be rehabilitated with species indigenous to the area. Re-seed with locally sourced seed of indigenous grass species that were recorded on site pre-construction.  Exotic weed control measures to be instituted through weed control programme. Regular redress of exotic weed through the use of herbicide and manual removal.	Final external audit of area to confirm that area is rehabilitated to an acceptable level.  Compile weed eradication programme for a period of 12 months after the decommissioning exercise. Appoint contractor to undertake the weed eradication programme. Monitor newly disturbed areas where infrastructure has been removed to detect and quantify any aliens that may become established after decommissioning and rehabilitation.	Once off  Weed eradication exercise to be undertaken every 6 months for a period of 12 months following decommissioning. Prior to the commencement of the	Main Contractor with advice from specialist  Holder of the EA with input from the specialist where necessary.

Mitigation/ Management Objectives	Mitigation/Management Actions			
		Methodology	Frequency	Responsibility
		Final external audit of area to confirm that area is free of alien invasive plants after 5 years.	decommissioning phase. Once-off	

## 8. PLANT RESCUE AND PROTECTION PLAN / RE-VEGETATION AND HABITAT REHABILITATION PLAN

In compliance with condition 19.5 of the EA's, the following plant rescue and protection plan / re – vegetation and habitat rehabilitation plan must be adopted and implemented. This plant rescue plan must be read in conjunction with the special conditions contained in the Biodiversity consent.

Impact	Mitigation/Management Objectives	Mitigation/Management Actions	Monitoring		
			Methodology	Frequency	Responsibility
<b>CONSTRUCTION PHASE</b>					
Excessive loss of natural vegetation in and outside the development footprint area and veld degradation	Minimise loss of natural vegetation.  Prevent impacts on natural vegetation in sensitive habitats and SSC.	Sensitive habitats and areas outside of the project development area should be clearly demarcated as no go areas during the construction phase to avoid accidental impacts. No development or activities should take place in the high sensitivity ecosystems.	Strict control over the behaviour of construction workers, restricting activities to within demarcated areas for construction. ECO must monitor activities and record and report non-compliance ESA to induct all staff prior to them undertaking any activities on the site.	Daily	ECO and Contractor
		Ensure that the footprint required for the proposed project activities is kept at a minimum.	Verify that the proposed project area is determined and outlined prior to the commencement of the construction phase by undertaking visual inspections.	Once-off prior to construction and as required during the construction process.	ECO
		The proposed project footprint must be demarcated to reduce unnecessary disturbance beyond the proposed project area.	Carry out visual inspections to ensure strict control over the behaviour of staff in order to restrict activities to within demarcated areas.	Weekly	ECO
		The Contractors and construction personnel must be made aware that indigenous vegetation must not be removed or damaged (this includes succulents (e.g., Hoodia gordonii, Euphorbia	Carry out Environmental Awareness Training. Conduct audits of the signed attendance registers.	Once-off training and ensure that all new staff are inducted. Monthly	Contractor/ ECO ECO



Impact	Mitigation/Management Objectives	Mitigation/Management Actions	Monitoring		
			Methodology	Frequency	Responsibility
		spp.) and the protected quiver tree, <i>Aloe dichotoma</i> and <i>Boscia</i> sp			
		Ensure that the temporary site camp is established at least 32 m away from the banks of the major drainage lines.	Monitor the placement of the site camp via visual inspections, and record and report any non-compliance.	Once-off prior to construction and as required during the construction phase.	ECO
		Unnecessary impacts on surrounding natural vegetation must be avoided during construction. All construction vehicles should remain on properly and clearly demarcated roads.	Strict control over the behaviour of construction workers, restricting activities to within demarcated areas for construction. Include periodical site inspection in environmental performance reporting that specifically records occurrence of off-road vehicle tracks in specific areas.	Daily	ECO and Contractor
		Undertake rehabilitation of disturbed areas as soon as possible after construction. Stockpile the shallow topsoil layer separately from the subsoil layers. Reinstatate the topsoil layers (containing seed and vegetative material) when construction is complete to allow the plants to rapidly re-colonise the bare soil areas. Re-seed with locally sourced seed of indigenous grass species that were recorded on site during the pre-construction phase.	Undertake following the construction phase and report any non-compliance.	Daily	ECO and Contractor
		The collection, hunting or harvesting of any plants, fuel wood or animals at the site during construction should be strictly forbidden and the staff educated to prevent this from happening.	Strict control over the behaviour of construction workers, restricting activities to within demarcated areas for construction. Carry out Environmental Awareness Training. Conduct audits of the signed attendance registers.	Daily Once-off training and ensure that all new staff are inducted. Monthly	ESA and Contractor/ ESA ESA
		Fires should only be allowed within fire-safe demarcated areas. Open fires must be prohibited. Appropriate fire safety training should also be provided to staff that are to be on site for the duration of the construction phase.	Strict control over the behaviour of construction workers, restricting activities to within demarcated areas. Ensure fire safety requirements are well understood and respected by workers (by providing basic fire safety training).	Daily	ESA and Contractor

Impact	Mitigation/Management Objectives	Mitigation/Management Actions	Monitoring		
			Methodology	Frequency	Responsibility
		Existing access roads/servitudes must be used and should be located along the boundaries of existing disturbed areas, if possible.	Compile plan pre-construction.	Prior to construction commencing	Holder of the EA
Impact on indigenous vegetation, and on SSC and their habitats	To reduce negative impacts on and loss of indigenous vegetation and protected trees.  Minimise impacts on SSC and protected trees.	Appoint a specialist to undertake a second review and site visit of the final layout of the development footprint, possibly during the late summer period, in order to identify any plant species on site that may require "rescue" as well as any exotic weeds/vegetation that require removal.	Appoint an Ecologist to oversee the final development footprint area through a reconnaissance survey (already completed).	Prior to the commencement of construction	Holder of the EA
		Identification of roadways and areas where extensive vegetation loss will result is required. Upon consideration, the avoidance of unnecessary clearance of vegetation on site should be undertaken through minor deviations to the design. Ensure that the footprint required for the proposed project activities is kept at a minimum.	Review how larger vegetation will be dealt with by contractors. Vegetation should be subject to redress when given a height that aligns with the lower limit of the PV array or when adjudged to affect construction.	Ongoing	Holder of the EA
		A plant rescue operation must be initiated.	Specialist must undertake a final walkthrough of the site prior to commencement of construction to ensure no SCC will be impacted on without permit (completed)	Once-off	Specialist and Contractor
		Clearing of vegetation should be kept to a minimum, keeping the width and length of the earthworks to a minimum.	Monitor activities and record and report non-compliance.	Daily	ESA and Contractor
		Avoid the removal of listed SSC or protected species as far as possible. Should any of the listed/protected species need to be removed, the requisite permits must be obtained prior to the removal of the species.	Monitor activities and record and report non-compliance.	Daily	ECO and Contractor
Disturbance of terrestrial fauna and flora on site due to construction workers and activities.	To advise construction staff of the requirements in respect of management of flora and fauna on site during the construction phase.	Conduct an Environmental Awareness Training and induction for all construction staff and personnel.	Carry out Environmental Awareness Training with a discussion on the management of terrestrial fauna and flora on site. Conduct audits of the signed attendance registers.	Prior to construction and as required by the ECO. Ensure that all new staff are inducted. Monthly	ECO and Contractor ECO

Impact	Mitigation/Management Objectives	Mitigation/Management Actions	Monitoring		
			Methodology	Frequency	Responsibility
Impact on fauna as a result of construction activities.	To identify any faunal mortalities and record the details (such as the reason, spatial extent etc.) in order to avoid repetition of fatality.	Establish a recording method in order to monitor the construction activities, including species presence within site, mortalities and siting's.	Establish database of species, siting's etc. Construction personnel should advise on the findings and presence of fauna on site.	Daily to monthly	ECO
	To remove species that may be found present in the construction footprint and laydown area.	Appoint a specialist to conduct an inspection of the final project area and sweep or inspect the site for any fauna, once the fencing is complete (i.e., the established site should be flushed to ensure any large wildlife is not contained within the fenced area). Appoint a small team to flush game during the early evening. Game should be flushed by driving a team through the gated facility towards the exit.	Team to flush game as required. ECO to monitor flushing process and record any incidents or non-compliance.	Once off prior to commencement and thereafter if required.	ECO and Holder of the EA
		The Contractor or Contractors Environmental Officer should monitor trenches at the start and end of each working day to check if any small animals are trapped.	Monitor activities and record and report non-compliance.	As required during construction	ECO and Contractor
		No animals (including snakes) shall be killed on site. An expert or a suitable specialist should be appointed to remove and relocate any poisonous snakes during the construction phase.	Monitor activities and record and report non-compliance.	As required during construction	ECO and Contractor
Faunal and avifaunal road mortality as a result of increased vehicles travelling to and within the site.	Minimise loss of fauna as a result of road mortalities.	The construction personnel and staff should be made aware of the presence of fauna within the proposed project area. The construction personnel and staff must also be made aware of the general speed limits on site and must be alert at all times for potential crossings.	Carry out Environmental Awareness Training. Conduct audits of the signed attendance registers.	Once-off training and ensure that all new staff are inducted. Monthly	ECO and Contractor ECO
		To ensure that animals are not attracted to the site (and potentially resulting in increased road mortality), the waste collection bins and skips should be covered with suitable material, where appropriate, and the site camp must be kept clean on a daily basis.	Monitor the activities via visual inspections, and record and report any non-compliance.	Daily	ECO and Contractor

Impact	Mitigation/Management Objectives	Mitigation/Management Actions	Monitoring		
			Methodology	Frequency	Responsibility
Impact and loss of fauna as a result of the fence line and exclusion of fauna from site resulting in ecological change within the site.	To reduce incidental mortality and injury of fauna within the construction area.	<ul style="list-style-type: none"> <li>Ensure that the live electrical fence wire is not placed at ground level.</li> <li>Conduct inspections of the fence line to address any animals that may be affected by the fence.</li> </ul>	Conduct regular (daily) inspections of the fence line to address any animals that may be affected by the fence.	Daily to monthly record keeping. A register of all faunal siting's indicating date of siting; species affected; position of species (specific or indicative) and other observations should be established.	Holder of the EA
Increased ELP, leading to changes in nocturnal behavioural patterns amongst fauna	The avoidance of electrical light pollution through prudent positioning of external lighting.	Placement of lighting, particularly security lighting, to avoid excessive influence on surrounding areas. Placement of lighting to be judiciously considered at time of implementation.	Review lighting plans and identify important habitat zones to be avoided.	Prior to the installation of lighting.	Holder of the EA, Contractor and ECO
<b>OPERATIONAL PHASE</b>					
Vegetation management on site	Manage vegetation throughout the site to avoid conflict with operations of the proposed PV facility. Excessive growth of vegetation on site may affect operations of the PV facility, while excessive clearance of vegetation on site has concomitant impacts on the land in question. Management of vegetation at an optimum level of growth and height is required.	<ul style="list-style-type: none"> <li>Identify protocol for pruning of vegetation and clearance where required.</li> <li>Identify level of pruning and vegetation management required.</li> </ul>	Identify means of pruning and clearance of vegetation. For example, brush cutter, grazing etc.	Ongoing and as required	Environmental Manager

Impact	Mitigation/Management Objectives	Mitigation/Management Actions	Monitoring		
			Methodology	Frequency	Responsibility
	Vegetation should be managed by brush cutters after the rainy season once the vegetation has flowered and disbursed seeds (June – August)				
Loss of SSC and their habitats	Control loss of natural vegetation during the operational phase.	Unnecessary impacts on surrounding natural vegetation must be avoided. All operational and maintenance vehicles to remain on the roads and no driving off road allowed. No unauthorized persons should be allowed onto the site.	Strict control over the behaviour of operation workers, restricting activities to within demarcated areas for operation. Strict control and proper education of staff to prevent misconduct.	Monthly	Environmental Manager
	Prevent impacts on natural vegetation in sensitive habitats and SSC.	The collection, hunting or harvesting of any plants, any protected trees, fuel wood or animals at the site should be strictly forbidden and the staff educated to prevent this from happening.	Strict control over the behaviour of construction workers, restricting activities to within demarcated areas for construction. Carry out Environmental Awareness Training. Conduct audits of the signed attendance registers.	Daily Once-off training and ensure all new staff are inducted. As required	Facility Manager and Environmental Manager
		All hazardous materials should be stored in the appropriate manner to prevent impacts on vegetation. Any accidental chemical, fuel and oil spills that occur at the site should be cleaned up in the appropriate manner as related to the nature of the spill.	Monitor the activities via visual inspections, and record and report any non-compliance.	Daily	Environmental Manager
		Fires should only be allowed within fire-safe demarcated areas. Open fires must be prohibited. Appropriate fire safety training should also be provided to staff that are to be on site for the duration of the operational phase.	Strict control over the behaviour of construction workers, restricting activities to within demarcated areas. Ensure fire safety requirements are well understood and respected by workers (by providing basic fire safety training).	Daily	Facility Manager and Environmental Manager
		A storm-water management plan must be implemented during the operational phase. Regular inspections of stormwater infrastructure	Verify that the stormwater management plan is being implemented and signed off prior the commencement of operations.	Prior to commencement of operations. Weekly/Monthly	Environmental Manager Facility Manager

Impact	Mitigation/Management Objectives	Mitigation/Management Actions	Monitoring		
			Methodology	Frequency	Responsibility
		should be undertaken to ensure that it is kept clear of all debris and weeds.	Undertake regular inspections of the stormwater infrastructure (i.e., by implementing walk through inspections).		
		Undertake maintenance of rehabilitated areas in accordance with the rehabilitation and landscaping plan.	Monitor topsoil removal and rehabilitation activities, and record and report non-compliance.	Weekly or Monthly	Facility Manager and Environmental Manager
		Continue with on-going monitoring programme to detect and quantify any alien species that may become established and identify the highly invasive species during the operation phase.	Monitor the presence of alien invasive species on the development site.	Reporting frequency depends on legal compliance framework	Facility Manager and Environmental Manager
Impact and loss of fauna as a result of operational activities.	To reduce the loss of and impact on fauna.	<ul style="list-style-type: none"> <li>• Prior to the commencement of the operational phase, the plant manager and the landowner need to reach a decision in terms of the allowance of faunal activities or redress of faunal activities within site.</li> <li>• Identify points of excessive faunal activity and impact on operations. Undertake monitoring of faunal activities within the fenced area of the site and the immediate proximity of the site.</li> <li>• Reduction in speed limits in and around site.</li> </ul>	<p>Establish reporting procedure.</p> <p>Monitor the presence of fauna during the operational phase via visual inspections and site visits.</p> <p>Carry out Environmental Awareness Training.</p> <p>Conduct audits of the signed attendance registers.</p>	<p>Daily</p> <p>Daily</p> <p>Once-off training and ensure all new staff are inducted.</p> <p>As required</p>	<p>Facility Manager and Environmental Manager</p> <p>Facility Manager</p>
Impact and loss of fauna as a result of the fence line and exclusion of fauna from site resulting in ecological change within the site.	To reduce the impact and loss of fauna from site as a result of their exclusion from the area.	<ul style="list-style-type: none"> <li>• Avoidance of damage to infrastructure by faunal activity as well as impact on fauna as a result of the site infrastructure.</li> <li>• Identify impact of burrowing and other faunal activities on the fence line and operations activities.</li> <li>• Undertake the management of faunal intrusion through the fence, including possible mortalities.</li> <li>• Provide critter paths through the fence line to allow species access to site.</li> <li>• Ensure that the live electrical fence wire is not placed at ground level.</li> </ul>	<p>Identify where fauna may be affecting operations of site (burrows etc.) Consider redress if necessary.</p> <p>Conduct regular (daily) inspections of the fence line to address any animals that may be affected by the fence.</p> <p>Monitor the activities via visual inspections, and record and report any non-compliance.</p>	<p>Daily to monthly record keeping.</p> <p>A register of all faunal siting's indicating date of siting; species affected; position of species (specific or indicative) and other observations should be established.</p> <p>Daily</p>	Holder of the EA

Impact	Mitigation/Management Objectives	Mitigation/Management Actions	Monitoring		
			Methodology	Frequency	Responsibility
		<ul style="list-style-type: none"> <li>Conduct inspections of the fence line to address any animals that may be affected by the fence.</li> <li>Promote and support faunal presence and activities within the proposed PV facility.</li> </ul>			
Impact of ELP around the site.	The avoidance of electrical light pollution through prudent positioning of external lighting.	<ul style="list-style-type: none"> <li>Placement of lighting, particularly security lighting to avoid excessive influence on surrounding areas.</li> </ul>	Review lighting plans and identify important habitat zones to be avoided.	Prior to the installation of lighting.	Holder of the EA and Environmental Manager
Faunal and avifaunal road mortality as a result of increased vehicles travelling to and within the site.	Minimise loss of fauna as a result of road mortalities.	The operational personnel and staff should be made aware of the presence of fauna within the proposed project area. The operational personnel and staff must also be made aware of the general speed limits on site and must be alert at all times for potential crossings.	Carry out Environmental Awareness Training. Conduct audits of the signed attendance registers.	Once-off training and ensure that all new staff are inducted. Monthly	Facility Manager Environmental Manager
		To ensure that animals are not attracted to the site (and potentially resulting in increased road mortality), the waste collection bins and skips should be covered with suitable material, where appropriate, and the offices must be kept clean on a daily basis.	Monitor the activities via visual inspections, and record and report any non-compliance.	Daily	ECO and Contractor
<b>DECOMMISSIONING PHASE</b>					
Rehabilitation of flora on site	Re-vegetation of the disturbed site is aimed at approximating as near as possible the natural vegetative conditions prevailing prior to operation.	<ul style="list-style-type: none"> <li>All damaged areas shall be rehabilitated upon completion of the contract.</li> <li>All natural areas must be rehabilitated with species indigenous to the area. Re-seed with locally sourced seed of indigenous grass species that were recorded on site pre-construction.</li> <li>Rehabilitation must be executed in such a manner that surface run-off will not cause erosion of disturbed areas.</li> </ul>	Conduct a final external audit to confirm that area is rehabilitated to an acceptable level.	Once off	Holder of the EA with feedback and input from an appropriate specialist. with advice from specialist

## 9. OPEN SPACE MANAGEMENT PLAN

An Open Space Management Plan must be compiled by an Ecological Specialist prior to commencement of construction.

## 10. HAZARDOUS SUBSTANCES LEAKAGE OR SPILLAGE MONITORING SYSTEM

The following hazardous substances leakage or spillage monitoring system must be adopted and implemented.

Impact	Environmental Impact Management Action.	Monitoring		
		Methodology	Frequency	Responsibility
Contamination of soil and risk of damage to vegetation and/or fauna through spillage of concrete and cement.	If any concrete mixing takes place on site, this must be carried out in a clearly marked, designated area at the site camp on an impermeable surface (such as on boards or plastic sheeting and/or within a bunded area with an impermeable surface).	Monitor the handling and storage of sand, stone and cement as instructed.	Daily	Holder of the EA, EPC contractor and ECO.
	Bagged cement must be stored in an appropriate facility and at least 10 m away from any water courses, gullies and drains.	Monitor the handling and storage of sand, stone and cement as instructed.	Daily	Holder of the EA, EPC contractor and ECO.
	A washout facility must be provided for washing of concrete associated equipment. Water used for washing must be restricted.	Monitor the handling and storage of sand, stone and cement as instructed.	Daily	Holder of the EA, EPC contractor and ECO.
	Hardened concrete from the washout facility or concrete mixer can either be reused or disposed of at an appropriate licenced disposal facility. Proof of disposal (i.e., waste disposal slips or waybills) should be retained on file for auditing purposes.	Monitor the handling and storage of sand, stone and cement as instructed. Monitor waste disposal slips and waybills via site audits and record non-compliance and incidents.	Daily Monthly	Holder of the EA, EPC contractor and ECO.
	Empty cement bags must be secured with adequate binding material if these will be temporarily stored on site. Empty cement bags must be collected from the construction area at the end of every day. Sand and aggregates containing cement must be kept damp to prevent the generation of dust.	Monitor the handling and storage of sand, stone and cement as instructed.	Daily	Holder of the EA, EPC contractor and ECO.
	Any excess sand, stone and cement must be removed from site at the completion of the construction period and disposed of at a licenced waste disposal facility. Proof of disposal (i.e., waste disposal slips or waybills) should be retained on file for auditing purposes.	Monitor the handling and storage of sand, stone and cement as instructed.	Daily Monthly	Holder of the EA, EPC contractor and ECO.



Impact	Environmental Impact Management Action.	Monitoring		
		Methodology	Frequency	Responsibility
		Monitor waste disposal slips and waybills via site audits and record non-compliance and incidents.		
Contamination of soil and risk of damage to vegetation and/or fauna through spillage of fuels and oils.	Ensure that adequate containment structures are provided for the temporary storage of liquid dangerous goods and hazardous materials on site (such as chemicals, oil, fuel, hydraulic fluids, lubricating oils etc.). Appropriate bund areas must be provided for the storage of these materials at the site camp. Bund areas should contain an impervious surface in order to prevent spillages from entering the ground. Bund areas should have a capacity of 110 % of the volume of the largest tank in the bund (tanks include storage of fuel/diesel).	Monitor the storage and handling of dangerous goods and hazardous materials on site via site audits and record non-compliance and incidents.	Weekly	EPC Contractor and ECO
	Monitor and inspect construction equipment and vehicles to ensure that no fuel spillage takes place. Ensure that drip trays are provided for construction equipment and vehicles as required.	Monitor the construction equipment and vehicles and monitor the occurrence of spills and the management process thereof. Record all spills and lessons learnt.	Daily During spill events	EPC Contractor and ECO
	Contractor to compile a Method Statement for refuelling activities under normal and emergency situations. If on-site servicing and refuelling is required in emergency situations, a designated area must be created at the construction site camp for this purpose. Drip trays <sup>23</sup> or similar impervious materials must be used during these procedures.	Verify if a Method Statement is compiled by reviewing approved and signed off reports. Monitor the refuelling/ servicing process and record the occurrence of any spillages.	Once-off prior to commencement of construction. During emergency refuelling and servicing activities.	ECO
	Spilled fuel, oil or grease must be retrieved, and contaminated soil removed, cleaned and replaced.	Monitor the handling and storage of fuels and oils via site audits and monitor if spillages have taken place and if so, are removed correctly. Monitor waste disposal slips and waybills via site audits and record non-compliance and incidents.	Daily (or during spills)	EPC Contractor and ECO
	Contaminated soil to be collected by the Contractor (under observation of the ECO) and disposed of at a registered waste facility designated	Monitor the correct removal of contaminated soil. Monitor waste disposal slips and waybills via site	Daily (or during spills)	EPC Contractor and ECO

- <sup>23</sup> In addition to the requirement to utilise a drip tray during refuelling, drip trays must be placed under all plant when it is not in use, regardless of whether this plant in the field or at the site camp.

Impact	Environmental Impact Management Action.	Monitoring		
		Methodology	Frequency	Responsibility
	for this purpose. Proof of disposal (i.e., waste disposal slips or waybills) should be retained on file for auditing purposes.	audits and record non-compliance and incidents.		
	A Spill Response Method Statement must be compiled by the Contractor for the construction phase to manage potential spill events.	Compile a Spill Response Method Statement. Audit signed and approved Spill Response Method Statement.	Once-off (and thereafter updated as required during the construction phase). Once-off (and thereafter as required during the construction phase).	Holder of the EA, EPC contractor and ECO.
	The Contractor must ensure that adequate spill containment and clean-up equipment are provided on site for use during spill events.	Monitor via site audits and record incidents and non-compliance.	Daily/Weekly	ECO and EPC Contractor
	Portable bioremediation kit (to remedy chemical spills) is to be held on site and used as required.	Ensure that a well-maintained portable bioremediation kit is available on site and that construction personnel and contractors are aware of its location and instructions	Daily	EPC Contractor and ECO
	In case of a spillage of hazardous chemicals where contamination of soil occurs, depending on the degree and level of contamination, excavation and removal to a hazardous waste disposal facility could be necessary. If the spillage is widespread and the soil is significantly contaminated, a specialist will need to be immediately appointed to address the spillage. This will usually entail the collection of samples of the contaminated soil followed by analysis in terms of the 2014 National Norms and Standards for the Remediation of Contaminated Land and Soil Quality (i.e., GN 331). If the soil is determined to be significantly contaminated, then compliance with Part 8 of the NEMWA should be achieved by the Applicant, including notifying the Minister of Environmental Affairs of the significant contamination.	Ensure that a suitably qualified specialist is appointed to collect and analyse the contaminated soil samples in terms of the 2014 Norms and Standards (i.e., GN 331) to determine if the soil is significantly contaminated or not. If the contaminated soil is significantly contaminated, then compliance with Part 8 of the NEMWA should be achieved by the Applicant.	During spill events	Holder of the EA
	The Contractor must record and document all significant spill events.	Monitor documentation and records of significant spill events via audits and record non-compliance and incidents.	During spill events	ECO
Contamination of soil and risk of damage to vegetation and/or	Monitor and inspect maintenance equipment and vehicles to ensure that no fuel spillage takes place.	Implement specifications for maintenance equipment use as	Monthly	Holder of the EA

Impact	Environmental Impact Management Action.	Monitoring		
		Methodology	Frequency	Responsibility
fauna through spillage of fuels and oils		specified by the maintenance Contractor.		
	Spilled fuel, oil or grease is retrieved during operations where possible and contaminated soil removed, cleaned and replaced.	Monitor the handling and storage of fuels and oils via site audits and monitor if spillages have taken place and if so, are removed correctly. Monitor waste disposal slips and waybills via site audits and record non-compliance and incidents.	During spills	Holder of the EA
	Contaminated soil to be collected by the Contractor and disposed of at a registered waste facility designated for this purpose. Proof of disposal (i.e., waste disposal slips or waybills) should be retained on file for auditing purposes.	Monitor the correct removal of contaminated soil. Monitor waste disposal slips and waybills via site audits and record non-compliance and incidents.	During spills	Holder of the EA
	A Spill Response Plan must be compiled for the operational phase to manage potential spill events.	Compile a Spill Response Plan. Audit signed and approved Spill Response Method Statement.	Once-off (and thereafter updated as required). Once-off (and thereafter as required).	Holder of the EA and Facility Manager
	Ensure that adequate spill containment and clean-up equipment are provided on site for use during spill events. Portable bioremediation kit (to remedy chemical spills) is to be held on site and used as required.	Ensure that a well-maintained portable bioremediation kit is available on site and that operational personnel are aware of its location and instructions.	Weekly	Facility Manager
	In case of a spillage of hazardous chemicals where contamination of soil occurs, depending on the degree and level of contamination, excavation and removal to a hazardous waste disposal facility could be necessary. If the spillage is widespread and the soil is significantly contaminated, a specialist will need to be immediately appointed to address the spillage. This will usually entail the collection of samples of the contaminated soil followed by analysis in terms of the 2014 National Norms and Standards for the Remediation of Contaminated Land and Soil Quality (i.e., GN 331). If the soil is determined to be significantly contaminated, then compliance with Part 8 of the NEMWA should be achieved by the Applicant, including notifying the Minister of Environmental Affairs of the significant contamination.	Ensure that a suitably qualified specialist is appointed to collect and analyse the contaminated soil samples in terms of the 2014 Norms and Standards (i.e., GN 331) to determine if the soil is significantly contaminated or not. If the contaminated soil is significantly contaminated, then compliance with Part 8 of the NEMWA should be achieved by the Applicant.	During spill events	Holder of the EA

Impact	Environmental Impact Management Action.	Monitoring		
		Methodology	Frequency	Responsibility
	Ensure that adequate containment structures are provided for the temporary storage of liquid dangerous goods and hazardous materials on site (such as chemicals, oil, fuel, hydraulic fluids, lubricating oils etc.). Appropriate bund areas must be provided for the storage of these materials at the PV facility. Bund areas should contain an impervious surface in order to prevent spillages from entering the ground. Bund areas should have a capacity of 110 % of the volume of the largest tank in the bund (tanks include storage of fuel/diesel).	Monitor the storage and handling of dangerous goods and hazardous materials on site via site audits and record non-compliance and incidents.	Weekly	Facility Manager
Impacts due to management solid and liquid wastes disposed of on the site during operational phase.	All operation waste to be removed from the site by an appointed service provider.	Waste removal and disposal to be monitored throughout operation.	Monthly	Facility Manager
	All liquid waste or spills (used oil, paints, lubricating compounds and grease from vehicles passing through the entrance facility) to be packaged and disposed appropriately at a registered landfill site.	Monitor the correct removal of liquid waste or spills. Monitor waste disposal slips and waybills via site audits and record non-compliance and incidents.	During spills	Holder of the EA
	Adequate containers for the cleaning of equipment and materials (paint, solvent) must be provided to avoid spillages.	Monitor the storage and handling of dangerous goods and hazardous materials on site via site audits and record non-compliance and incidents.	Weekly	Facility Manager

## 11. STORMWATER MANAGEMENT AND EROSION MANAGEMENT PLAN

In compliance with condition 19.6 and 19.7 of the EA's, the Stormwater Management Plan attached in this EMP must be adopted and Implemented.

General principle	Specific outcomes	When	Ref No.	Focus area	Action	Responsible party
Separate clean - and dirty water to ensure clean water remains uncontaminated	Temporary containments and diversion (designed for a 1 in 5-year event)	During contractors site establishment	1	<ul style="list-style-type: none"> <li>Stockpiles;</li> <li>Laydown areas;</li> <li>Workshops; and</li> <li>Any other area likely to generate sediment during a storm event or contain contaminants that can be disbursed.</li> </ul>	Clean water diversions or bunds: Construct stormwater drains or bunds to divert clean runoff around dirty areas. The diversion should be sized for 1 in 5-year event. Typical design will be an excavated earth channel or berms. For the permanent topsoil stockpile, berms and channels to remain in place until stockpile revegetates.	Construction contractor's onsite environmental officer/representative
	Permanent containments and diversions (designed for a 1 in 50-year event)	Constructed prior to operation	2	<ul style="list-style-type: none"> <li>The workshop and chemical stores;</li> <li>Transformers, inverters and substations (if not banded); and</li> <li>Wastewater conservancy tank.</li> </ul>	Clean water diversions or bunds: Construct stormwater drains or bunds to divert clean runoff around the workshop, chemical stores, transformers, inverters, substations and wastewater conservancy tank. The diversion should be designed for a 1 in 50-year event.	Included in detailed designs of design engineer and carried out by contractor appointed for construction
Collect and, where required, treat dirty water or runoff from any dirty areas.	Dirty water should not have the potential to spill into clean water systems more than once every fifty years (where influenced by stormwater)	Before stockpiles are deposited	3	Stockpiles	Construct silt fences or berms: to prevent the sediment transport into rivers, All stockpiles to be removed after construction phase ends except permanent topsoil stockpile for decommissioning, Berms to remain around topsoil stockpile until it revegetates.	Included in detailed designs of design engineer and carried out by contractor appointed for construction
		Throughout construction	4	Waste	Dispose of landfill, oils and other contaminants offsite	
		During site establishment	5	Sewage	Supply chemical toilets	
		Constructed prior to operation	6	Workshop	Workshop collection drain with oil and grease trap: Construct a small concrete drain collecting all water, potentially containing oils and lubricants, from workshop floor and directing it through an oil and grease trap before discharge (or removing to offsite facility). Floor to be sloped such that all water will collect in drains.	Workshop manager and assurance by environmental manager
		Inspect every 3 months for first 2 years and then revise	7	Workshop	The oil and grease traps are to be inspected and, when necessary, cleaned and waste taken to a registered offsite facility	
		As required when the tank is full	8	Transformers	Dispose of any spent oil, removed from transformers during maintenance, to a registered offsite facility	
	As required when the tank is full	9	The sewage conservancy tank	Regularly collect sewage in the conservancy tank and disposed of at a licensed municipal sewage treatment plant.		
	Bund any hazardous substance or pollutant storage areas (including any oils), as per regulations	Throughout construction	10	General	Construct temporary bunds for any chemicals such as oils or fuel stored on sited during construction. Bunds must contain at least 100% of the volume of the container. If all containers are stored together the bund must store at least 110% of the largest container or 25% of the total storage capacity, whichever is greater. Suitability of the material of bund must be investigated whenever a new substance is added to the bund	Included in detailed designs of design engineer and carried out by contractor appointed for construction
		Constructed prior to operation	11	Transformers	All transformers will be banded with bund capacity of at least 110% of the maximum volume of oil in the transformer. Transformers and bund will be protected from rainfall by small covers or roof or housed in containers, as applicable.	
		During operation: as and when containers are purchased	12	The sewage conservancy tank	The sewage conservancy tank will be a closed tank with an automatic alert system.	Workshop manager and assurance by environmental manager
During operation: as and when containers are purchased	13	Workshop	Small trays for workshop chemicals: Bund any containers with oils and lubricants by placing them in plastic trays that is at least 100% of the volume of the container. If all containers are stored together the bund needs to store at least 110% of the largest container or 25% of the total storage capacity, whichever is greater. Suitability of the bund must be investigated whenever a new substance is added to the bund.			
Do not impede surface and	Minimise dirty areas such that surface and subsurface	Constructed prior to operation	14	The workshop, transformers, wastewater conservancy tank	Place diversion channels directly upstream of dirty areas such that dirty area catchments are minimised in footprint	Included in detailed designs of design engineer and carried out by

General principle	Specific outcomes	When	Ref No.	Focus area	Action	Responsible party	
subsurface flow along drainage lines	movement of water along the drainage lines is not impeded	Throughout construction	15	<ul style="list-style-type: none"> <li>Laydown areas; and</li> <li>Stockpiles</li> </ul>	Minimise laydown areas and stockpiles. The permanent topsoil stockpile is excluded from this as it will be the natural topsoil from the area and gentler slopes are recommended which will necessitate a larger area.	contractor appointed for construction	
	Ensure any engineered clean stormwater drainage directs water to the closest naturally receiving drainage line		16	All drains	Ensure that any temporary stormwater drains or diversion berms direct water towards the drainage line to which it would naturally flow		
		Constructed prior to operation	17	The workshop, transformers, wastewater conservancy tank	Drains to follow natural topography. Ensure outlets drain towards the natural drainage line that would originally have received flow from that area		
Control, monitor and manage erosion	Prevent erosion in general	Constructed prior to operation	18	All areas	Only remove vegetation where required for the installation of solar panels as to not disturb the natural topography	Included in detailed designs of design engineer and carried out by contractor appointed for construction	
		During operation	19		No stockpiles if possible except for the permanent topsoil stockpile.		Environmental manager
	Minimize erosion in large storm event of 1 in 50- years or greater	Constructed prior to operation	20	All drains	Drains sloped and sized such that velocities do not exceed 1 m/s	Included in detailed designs of design engineer and carried out by contractor appointed for construction	
			21	Road crossings	Line all major drifts on road crossings with material sufficient to prevent erosion during high flow (e.g. gravel or concrete). If concrete is used, place a section of riprap (larger rocks) underlain by gravel and with gravel on either side to facilitate a smooth flow transition. Detailed modelling and design of road crossings such that erosion is controlled to be a feature of the detailed design.		
			22	All drains	Dissipaters: At drain outlets widen the channel and use riprap (can be sourced from spoil during construction) or reno mattresses to dissipate stormwater flows		
	Dissipate stormwater at all drainage outlets to velocities unlikely to cause erosion in natural soils for a 1 in 50-year storm event	Throughout construction	23	Road crossings	Dissipation at road crossings: Detailed modelling and design of road crossings including riprap (can potentially be sourced from spoil during construction) or reno-mattresses.	Construction contractors onsite environmental officer/representative	
	Prevent erosion in general		24	All	Maintain natural topography and vegetation: Do not disturb the natural topography or vegetation where possible		
	Minimize erosion in large storm event of 1 in 5-years or greater	Early in construction	25	All drains	Engineer low velocity temporary drains: Drains sloped and sized such that velocities do not exceed 1 m/s in a 1 in 5-year event	Environmental manager or hydrologist/engineer/environmental scientist appointed by the environmental manager	
		26	Road crossings	Engineered temporary drifts: Build roads and road crossings before other infrastructure,			
	Ensure that any chronic erosion is detected and rehabilitated within 6 months	Every 3 months for the first 2 years and annually thereafter	27	<ul style="list-style-type: none"> <li>PV cell blocks;</li> <li>Drains;</li> <li>Outlet of all Drains; and</li> <li>All-natural drainage lines that cross the access road.</li> </ul>	Inspect all focus areas for erosion. If erosion is found, remediate and redesign the drainage in the area. If erosion is found in a natural drainage line, conduct an assessment and determine the cause. Develop a plan to prevent future erosion.	Included in detailed designs of design engineer and carried out by contractor appointed for construction	
	Ensure that any acute erosion due to large storm events is detected within 2 weeks.	Install prior to operation	28	Main office	Install a rain gauge that can measure greater than 150 mm.		
		After a rain event of greater than 150 mm in one day (a 10 year - 24-hour rain event) or when staff notice flood damage.	29	All-natural drainage lines that run through the site	Inspect and remediate acute erosion: Inspect all focus areas for erosion. If erosion is found remediate and redesign the drainage in the area. If erosion is found in a natural drainage line conduct and assessment and determine the cause and develop a plan to prevent future erosion.		Environmental manager or hydrologist/engineer/environmental scientist appointed by the environmental manager
		Design and development prior to operation	30	All	Set up rain data system: Build or buy a basic rain program, preferably electronic, that allows site staff to enter rain data from the rain gauge. Ideally the system should let the environmental manager and site manager when a rainfall event in excess of 150 mm.		
Daily	31	Main office	Record rain data: Read and record rain gauge daily;	Onsite staff member tasked by the Environmental manager			

General principle	Specific outcomes	When	Ref No.	Focus area	Action	Responsible party
		Update annually in case of staff change	32		Signs at main office to aid problem reporting: Ensure that a sign providing the following is posted in the reception area, the control room, on each transformer and in the workshop: The name, telephone number and email address of the environmental manager. The sign should state: "If you notice any leaks or spills or erosion anywhere on the property please contact the Environmental Manager by one of these methods..."	Environmental manager
	Training	Annually	33	All	Training: Provide a short briefing to all construction staff on the dynamics of erosion and leaks that covers at least: <ul style="list-style-type: none"> <li>How to identify erosion;</li> <li>How to identify a leak, including car leaks;</li> <li>Where to find contact details of the environmental officer/representative in case of leaks or erosion.</li> </ul>	Environmental manager or hydrologist/engineer/environmental scientist appointed by the environmental manager
	Ensure that any erosion is detected and rehabilitated	After rain events	34	All	Inspect the site for erosion after rain events. If erosion is found, remediate and redesign the drainage in the area. If erosion is found in a natural drainage line, conduct an assessment to determine the cause and develop a plan to prevent future erosion.	Contractors environmental officer/representative
		During site establishment	35		Install a rain gauge that can measure greater than 150 mm. This rain gauge will also be used during operation.	
Monitor and manage stormwater system	Include a monitoring system for spills and leaks such that they are detected as soon as possible.	Once every 2 weeks during Construction	36	All	Leak inspection: regularly check for leaks and for any breaches or evidence of spills or any other problems not in adherence to this SWMP. All cars should also be checked for oil leaks and any leaks found should be stopped immediately, the cause of the leak identified, the problem remediated such that no further leaks occur, and any contaminated soil or water assessed and remediated.	Contractors environmental officer/representative
	Include a monitoring system for spills and leaks such that they are detected as soon as possible.	Every 3 months for the first 2 years and annually thereafter (Operation)	37		Leak inspection: regularly check for leaks and for any breaches or evidence of spills or any other problems that would indicate that it is not in adherence to this plan. All cars should also be checked for oil leaks during the inspection. Any leaks found should be stopped immediately, the cause of the leak sought, the problem remediated such that no further leaks occur, and any contaminated soil or water assessed and remediated.	Environmental manager or hydrologist/engineer/environmental scientist appointed by the environmental manager
		Continuous	38		Data capture, training and signs: see 32, 33, 34, 35, 36, & 37	Environmental manager and staff in general
		Construct prior to operation	39	The sewage conservancy tank	Sewage conservancy tank alert system: Install a float switch-controlled alarm that will alert the control room when the conservancy tank has less than 2 weeks of capacity remaining.	Included in detailed designs of design engineer and carried out by contractor appointed for construction
			40	Transformers	Signs at transformers: Post a sign on transformers stating "If you notice any leaks or spills or erosion anywhere on the property please contact reception via one of the following methods .....and report it"	
General	Do not build infrastructure within near to watercourses	Detailed design	41	All	Ensure no infrastructure except roads, solar panels and solar panel supports are built within 300 m of a water course. In particular, ensure no dirty areas, that may contain pollutants, are within 300 m of the water course	Design engineer or engineer appointed by the design engineer
	Do not build infrastructure containing potential pollutants in any of the natural drainage lines.		42		Ensure that final infrastructure plans do not propose any potentially polluting infrastructure, such as transformers, workshops or conservancy tanks in the natural drainage lines (currently none are proposed)	
	Review and improve stormwater management plan regularly.	Once every 5 years	43		Review and improve the stormwater plan	Environmental manager or engineer appointed by the environmental manager
	Review and inspect	Once every 2 months during construction depending schedule	44		Inspect the site to ensure adherence to the stormwater management plan	Applicant's environmental representative or engineer
	Do not place stockpiles or other potentially polluting construction items within 300 m of the watercourse	Detailed design and throughout construction	45		Do not place laydown areas, stockpiles within 300 m of the watercourse	Design engineer or engineer appointed by the design engineer
	General	Detailed design	46		Develop a specific environmental specification for any construction including, but not limited to, the actions in this stormwater management plan and its principles	Applicant's environmental representative or specialist
	Prepare for spills	Construction and Operation	47		Procure spill kits and place in areas where fuel or oils are transferred (e.g. workshops)	Environmental manager

## 12. FIRE MANAGEMENT PLAN

The following Fire Management Plan must be adopted and implemented.

The PV development site is arid, with sparse vegetation cover and fires are not a natural phenomenon in the area. However, under exceptional circumstances, such as following years of exceedingly high rainfall, sufficient biomass may build up to carry fires. Therefore, management of plant biomass within the site should be part of the management of the facility. Grazing by livestock is the simplest and most ecologically sound way to manage plant biomass and is recommended the preferred method to manage plant biomass at the site if found to be practical. Alternative management practices can include brush cutting. Utilisation of non-selective herbicides for the management of biomass is prohibited on site. The following environmental impact management actions must be implemented with regards to fire management.

**Impact management outcome:** To reduce the risk of fire to infrastructure and environment.

Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>Fires should only be allowed within fire-safe demarcated areas (and only within the site camp);</li> <li>No fuelwood collection is allowed on-site;</li> <li>The total removal of all invasive alien vegetation should take place to decrease the fire risk – Although there were few invasive plants found during the environmental process, these may establish to a degree as a result of site disturbance. This must be done in accordance with the Alien Vegetation Management Plan;</li> <li>Cigarette butts may not be thrown in the veld but must be disposed of correctly. The contractor, must designate smoking areas (in compliance with the Tobacco Products Control Amendment Act 63 of 2008) with suitable receptacles for disposal;</li> <li>In case of an emergency, the contact details of the local fire and emergency services must be readily available;</li> </ul>	EPC Contractor	In compliance with the actions defined as well as requirements detailed in the health and safety plan.	Throughout the construction phase	ESA and ECO	Daily	Weekly environmental checklists.  Monthly environmental control reports.



Impact Management Actions	Responsible person	Method of implementation	Timeframe for implementation	Responsible party for monitoring	Frequency of monitoring	Evidence of compliance
<ul style="list-style-type: none"> <li>• Contractors must ensure that basic firefighting equipment and suitably qualified/experienced personnel are available on site at all times, as per the specifications defined by the health and safety representative / consultant;</li> <li>• The fire risk on site is a point of discussion that must take place as part of the pre-construction compliance workshop and the environmental induction training prior to commencement of construction;</li> <li>• Biomass from the removal of woody vegetation currently present on site should be chipped to reduce its flammability, and</li> <li>• The contractor must also comply with the requirements of the Occupational Health and Safety Act with regards to fire protection.</li> </ul>						

### 13. DECOMMISSIONING PHASE – IMPACT MANAGEMENT OUTCOMES AND ACTIONS

Should the activity ever cease or become redundant, the holder of the authorisation must undertake the required actions as prescribed by legislation at the time and comply with all relevant legal requirements.

After the lifespan of the facility<sup>24</sup> (20-25 years), there is a possibility that the entire facility will be decommissioned and closed (although other options for continuation may be investigated)

Appendix 5 of Regulation 982 of the 2014 EIA Regulations contains the required contents of a Closure Plan. The table below shows the minimum requirements for a closure plan. The operating entity for this facility must ensure that the closure plan complies with these requirements as well as any other legislative requirements that may come into effect during the lifecycle of the project.

Requirement
(1) A closure plan must include -
(a) Details of - (i) The EAP who prepared the closure plan; and (ii) The expertise of that EAP.
(b) Closure objectives.
(c) Proposed mechanisms for monitoring compliance with and performance assessment against the closure plan and reporting thereon.
(d) Measures to rehabilitate the environment affected by the undertaking of any listed activity or specified activity and associated closure to its natural or predetermined state or to a land use which conforms to the generally accepted principle of sustainable development including a handover report, where applicable.
(e) Information on any proposed avoidance, management and mitigation measures that will be taken to address the environmental impacts resulting from the undertaking of the closure activity.
(f) A description of the manner in which it intends to – (i) Modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation during closure; (ii) Remedy the cause of pollution or degradation and migration of pollutants during closure. (iii) Comply with any prescribed environmental management standards or practises; or (iv) Comply with any applicable provisions of the Act regarding closure.
(g) Time periods within which the measure contemplated in the closure plan must be implemented.
(h) The process for managing any environmental damage, pollution, pumping and treatment of extraneous water or ecological degradation as a result of closure.
(i) Details of all public participation processes conducted in terms of regulation 41 of the Regulation, including – (i) Copies of any representations and comments received from registered interested and affected parties; (ii) A summary of comments received from, and a summary of issues raised by registered interested and affected parties, the date of receipt of these comments and the response of the EAP to those comments;

• <sup>24</sup> For the purposes of this section, the lifespan of the facility is deemed to be the period of the power purchase agreement.

Requirement
<ul style="list-style-type: none"> <li>(iii) The minutes of any meetings held by the EAP with interested and affected parties and other role players which record the views of the participants;</li> <li>(iv) Where applicable, an indication of the amendments made to the plan as a result of public participation processes conducted in terms of regulation 41 of these Regulations.</li> </ul>
<ul style="list-style-type: none"> <li>(j) Where applicable, details of any financial provisions for the rehabilitation, closure and ongoing post decommissioning management of negative environmental impacts.</li> </ul>

Within a period of at least 12 months prior to the planned closure and decommissioning of the site, a Closure Plan must be prepared and submitted to the Local Planning Authority, as well as the Provincial and National Environmental Authorities and the Department of Forestry, Fisheries and the Environment (DFFE) for input and approval. This plan must provide detail pertaining to site restoration, soil replacement, landscaping, pro-active conservation, and a timeframe for implementation. Furthermore, the Closure Plan must comply with any additional legislation and guidelines that may be applicable at the time.

Two possible scenarios are considered for this decommissioning phase, as follows:

### **13.1 SCENARIO 1: TOTAL CLOSURE & DECOMMISSIONING OF SOLAR FACILITY**

If the decision is taken at the end of the project lifespan (20 - 25 years) to totally decommission the solar facility i.e., make the land available for an alternative land use, a closure plan as detailed above should be developed and should include provision for the following:

- All concrete and solar infrastructure etc. must be removed from the solar site i.e., panels, support structures etc.;
- The holes where the panel support structures are removed must be levelled and covered with subsoil and topsoil;
- Tracks that are to be utilised for the future land use operations should be left in-situ. The remainder of the tracks to be removed (ripped), topsoil replaced and brush-packed to encourage re-vegetation and minimise erosion;
- All auxiliary buildings and access points should be demolished, and rubble removed, unless they can be used for/by the future land use. The competent authority may prescribe that the landscaping and underground infrastructure i.e., foundations be left *in situ*;
- The underground electric cables must be removed, if they cannot be used in the future land use;
- All material (cables, PV Panels etc.) must be re-used or recycled wherever possible. Functional panels that still produce sufficient output could be repurposed upon decommissioning;
- The disturbed portions of the site must be brush-packed, replanted and/or seeded with locally sourced indigenous vegetation (as prescribed by the competent authorities) to allow re-vegetation and rehabilitation of the site (see plant species list attached);
- Discontinuation of Lease and Easement Agreements for main land and access roads;
- Consider whatever is economically or socially beneficial and risky for the project's Owners and other Stakeholders at this last stage
  - This could include selling equipment on secondary market, recycling of metals and modules as scrap, using some or all the proceeds to pay the local labour for uninstallation work, etc?
  - PV leaves no pollution and the equipment other than the modules which should be reused or recycled (There is an existing market for this).

### **13.2 SCENARIO 2: PARTIAL DECOMMISSIONING / UPGRADE OF SOLAR FACILITY**

Due to low variable costs and loans repaid long ago, any owner of the facility may be interested in prolonging technical, functional, legal and economic lives of the plants for as long as possible, even beyond Power Purchase Agreement.

- This will require disposal of assets with shorter technical lives are critical (inverters, etc). PV modules, substructures, cables have a lifespan that should be longer than 25 years;
- Under this option, the O&M contractor will have to ensure that the validity period of all licences / permits and agreements is extended where necessary and that any legislation that has subsequently been promulgated is considered.

Should more advanced technology become available it may be decided to continue to use the site as a renewable energy / photovoltaic / solar facility. Should this be the case, it is likely that much of the existing infrastructure will be re-used in the upgraded facility.

All infrastructure that will no longer be required for the upgraded facility must be removed as described in Scenario 1 above. The remainder of the infrastructure should remain in place or upgraded depending on the requirements of the new facility. As described for Scenario 1 above, the function PV panels that are still capable of producing sufficient output, could be donated to local schools and clinics. Any upgrades to the facility at this stage must comply with relevant legislation and guidelines of the time.

## **14. MONITORING AND AUDITING**

This section provided additional information of the monitoring and auditing requirements for the facility. It should be read in conjunction with the monitoring requirements outlined in the environmental impact management action tables as well the section on document control and reporting (which mainly deals with the internal monitoring requirements).

Environmental monitoring and audits are fundamental in ensuring the implementation of the management actions contained within this EMP are environmentally sustainable during development and operation of this PV Facility.

### **14.1 ENVIRONMENTAL MONITORING**

#### **14.1.1 Construction ECO and ESA Monitoring**

The ECO, assisted by the ESA, is responsible for environmental monitoring during of the construction phase impact management actions as outlined in of this EMP. The monthly environmental control reports compiled by the ECO (which include the weekly environmental checklists compiled by the ESA), as well as the photographic record of works, must be submitted to the Holder of the EA, the EPC contractor, the local authority, the provincial environmental authority, the national environmental authority and Eskom.

The following overarching recording and reporting requirements are required<sup>25</sup>:

- The holder of the authorisation must keep all records relating to monitoring and auditing on site and make it available for inspection to any relevant and competent authority in respect of this development.
- These compliance records must be submitted to the Director: Compliance monitoring at the DFFE.

#### **14.1.2 Construction Phase Alien Vegetation Monitoring**

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• <sup>25</sup> This must be read in conjunction with section 2 of the EMP

This section must be read in conjunction with the Alien Invasive Vegetation Management Plan once completed.

The following monitoring actions should be implemented during the construction phase of the development.

**Table 4:** Alien vegetation monitoring requirements during the construction phase.

Monitoring Action	Indicator	Timeframe
Document alien species present at the site	List of alien species	Preconstruction
Document alien plant distribution	Alien plant distribution map within priority areas	3 Monthly
Document & record alien control measures implemented	Record of clearing activities	3 Monthly
Review & evaluation of control success rate	Decline in documented alien abundance over time	Biannually

### 14.1.3 Operational Phase Alien Vegetation Monitoring

This section must be read in conjunction with the Alien Invasive Vegetation Management Plan once completed.

The following monitoring actions should be implemented during the operational phase of the development.

**Table 5:** Alien vegetation monitoring requirements during the operational phase

Monitoring Action	Indicator	Timeframe
Document alien 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

### 14.1.4 Rehabilitation and Habitat Restoration Monitoring requirements

As rehabilitation success, particularly in arid areas is unpredictable, monitoring and follow-up actions are important to achieve the desired cover and soil protection.

- Re-vegetated areas should be monitored every 4 months for the first 12 months following construction.
- Re-vegetated areas showing inadequate surface coverage (less than 20% within 12 months after re-vegetation) should be prepared and re-vegetated;
- Any areas showing erosion, should be re-contoured and seeded with indigenous grasses or other locally occurring species which grow quickly.

### 14.1.5 Plant Rescue Monitoring Requirements

It is important to monitor the success of the plant rescue operations, in order to the licencing authority on such conditional rescue.

Post construction monitoring of plants translocated during search and rescue must be undertaken to evaluate the success of the intervention. Biannual monitoring for 2 years post-transplant should be sufficient to gauge success.

The condition and numbers of all the rescued plants should be recorded and provided to the Audit consultant for inclusion in the environmental audit report.

## 14.2 ENVIRONMENTAL AUDITING<sup>26</sup>

The holder of the environmental authorisation must, for the period during which the environmental authorisation is valid, ensure that project compliance with the conditions of the environmental authorisation and the EMPr are audited, and that the audit reports are submitted to the Director: Compliance Monitoring at DFFE as required by condition 30.

In compliance with condition 31 of the EA's, this EMPr recommends that audits be submitted to the following auditing schedule:

- Within 1 year of commencement of construction activities;
- Within 30 days of completion of construction and rehabilitation activities (as required by condition 32 of the EA's);
- Every 3 years after the initial operational audit.

To promote transparency and cooperative governance, the results of relevant audits should be submitted to:

- The operators of the facility;
- The local authority;
- The provincial environmental authority;
- The national environmental authority: (DFFE); and
- Eskom.

The results of the audit must be recorded in an environmental audit report and any non-compliance must be formally recorded, along with the response-action required or undertaken. Each non-compliance incident report must be issued to the relevant person(s), so that the appropriate corrective and preventative action is taken within an agreed upon timeframe.

The table below shows the legislated requirements of an audit reports, and all relevant environmental audits undertaken as part of this development (during construction and operation) should comply with these requirements.

**Table 6:** Contents of an audit report

<b>(1) An Environmental audit report prepared in terms of these Regulations must contain:</b>
(a) Details of – (i) The independent person who prepared the environmental audit report; and (ii) The expertise of independent person that compiled the environmental audit report.
(b) Details of – (i) The independent person who prepared the environmental audit report; and (ii) The expertise of independent person that compiled the environmental audit report.
(c) A declaration that the independent auditor is independent in a form as may be specified by the competent authority.
(d) An indication of the scope of, and the purpose for which, the environmental audit report was prepared.
(e) A description of the methodology adopted in preparing the environmental audit report.
(f) An indication of the ability of the EMPr, and where applicable the closure plan 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 environmental authorisation, EMPr, and where applicable, the closure plan.
(g) A description of any assumptions made, and any uncertainties or gaps in knowledge.

- <sup>26</sup> To ensure independence, the auditing defined in this section cannot be undertaken, by the Holder of the EA, the EPC contractor, nor the Environmental Control Officer. These should be undertaken by an external audit consultant.

(h) A description of a consultation process that was undertaken during the course of carrying out the environmental audit report.
(i) A summary and copies of any comments that were received during any consultation process
(j) Any other information requested by the competent authority.

## 15. METHOD STATEMENTS

Method statements are written submissions by the Contractor to the Employers Representative and ECO in response to the requirements of this EMPr or in response to a request by the Employers Representative or ECO. The Contractor shall be required to prepare method statements for several specific construction activities and/or environmental management aspects.

The Contractor shall not commence the activity for which a method statement is required until the Employers Representative and ECO have approved the relevant method statement.

Method statements must be submitted at least five (5) working days prior to the proposed date of commencement of the specific activity. Failure to submit a method statement may result in suspension of the activity concerned until such time as a method statement has been submitted and approved.

An approved method statement shall not absolve the Contractor from any of his obligations or responsibilities in terms of the contract. However, any damage caused to the environment through activities undertaken without an approved method statement shall be rehabilitated at the contractor's cost.

Additional method statements can be requested at the ECO's discretion at any time during the construction phase.

The method statements should include relevant details, such as:

- Construction procedures and location on the construction site;
- Start date and duration of the specific construction procedure;
- Materials, equipment and labour to be used;
- How materials, equipment and labour would be moved to and from the development site, as well as on site during construction;
- Storage, removal and subsequent handling of all materials, excess materials and waste materials;
- Emergency procedures in case of any potential accident / incident which could occur during the procedure;
- Compliance / non-compliance with an EMPr specification and motivation for proposed non-compliance.

### 15.1 METHOD STATEMENTS REQUIRED

Based on the specifications in this EMPr, the following method statements are likely to be required as a minimum (more method statements may be requested at any time as required under the direction of the ECO):

- Vegetation clearing & topsoil stripping, and associated stockpiling;
- Hazardous substances declaration of use, handling and storage – e.g., for fuels, chemicals, oils and any other harmful / toxic / hazardous materials;
- Cement and concrete batching;
- Traffic, transport & delivery accommodation e.g., need for traffic diversion/turning circles etc.;
- Solid waste management / control procedures;
- Stormwater and wastewater management / control systems;
- Erosion remediation and stabilisation;
- Fire control and emergency procedures;
- Job site security plan;

- Blasting activities (if necessary);
- Drilling and Ramming activities;
- Re-vegetation, rehabilitation and re-seeding.

## 16. HEALTH & SAFETY

The holder of the Authorisation must train safety representatives, managers and workers in workplace safety. The construction process must be compliant with all safety and health measures by the relevant act.

This section aims to provide a high-level overview to occupational Health and Safety Act but does not in any manner replace the project specific Health and Safety plan which would need to be compiled and approved in terms of this act and associated regulations.

The Occupational Health and Safety Act (No. 85 of 1993) aims to provide for / ensure the health and safety of persons at work or in connection with the activities of persons at work and to establish an advisory council for occupational health and safety.

The main Contractor must ensure compliance with the Occupational Health and Safety Act, as well as that all subcontractors comply with the Occupational Health and Safety Act.

The following is of key importance (Section 8 of the previously mentioned Act):

General duties of employers to their employees

**(1)** Every employer shall provide and maintain, as far as is reasonably practicable, a working environment that is safe and without risk to the health of his employees.

**(2)** Without derogating from the generality of an employer's duties under subsection (1), the matters to which those duties refer include in particular-

(a) the provision and maintenance of systems of work, plant and machinery that, as far as is reasonably practicable, are safe and without risks to health;

(b) taking such steps as may be reasonably practicable to eliminate or mitigate any hazard or potential hazard to the safety or health of employees, before resorting to personal protective equipment;

(c) making arrangements for ensuring, as far as is reasonably practicable, the safety and absence of risks to health in connection with the production, processing, use, handling, storage or transport of articles or substances;

(d) establishing, as far as is reasonably practicable, what hazards to the health or safety of persons are attached to any work which is performed, any article or substance which is produced, processed, used, handled, stored or transported and any plant or machinery which is used in his business, and he shall, as far as is reasonably practicable, further establish what precautionary measures should be taken with respect to such work, article, substance, plant or machinery in order to protect the health and safety of persons, and he shall provide the necessary means to apply such precautionary measures;

(e) providing such information, instructions, training and supervision as may be necessary to ensure, as far as is reasonably practicable, the health and safety at work of his employees;

(f) as far as is reasonably practicable, not permitting any employee to do any work or to produce, process, use, handle, store or transport any article or substance or to operate any plant or machinery, unless the precautionary measures contemplated in paragraphs (b) and (d), or any other precautionary measures which may be prescribed, have been taken;



- (g) taking all necessary measures to ensure that tire requirements of this Act are complied with by every person in his employment or on premises under his control where plant or machinery is used;
- (h) enforcing such measures as may be necessary in the interest of health and safety;
- (i) ensuring that work is performed, and that plant or machinery is used under the general supervision of a person trained to understand the hazards associated with it and who have the authority to ensure that precautionary measures taken by the employer are implemented; and
- (j) causing all employees to be informed regarding the scope of their authority as contemplated in section 37 (1) (b).

## 17. CONTRACTORS CODE OF CONDUCT

The Contractor's Code of Conduct is a document to be drawn up by the holder of the EA<sup>27</sup> and provided to all contractors or subcontractors that undertake any service on site. This code of conduct should include generic conduct rules for construction and operation activities on this Solar Energy Facility and must be signed by all contractors. **This code of conduct does not exonerate contractors from complying with this EMPr and must not be viewed as a stand-alone document.**

The following general template is suggested for this Code of Conduct document and must be adapted and updated to include the provisions of this EMPr, recommendations of participating specialists, conditions of approval of the Environmental Authorisation, conditions imposed by the Local Authority (as part of the rezoning and consent use), as well as all service agreements.

### 17.1 OBJECTIVES

To ensure compliance with the Conditions of the Environmental Authorisation, the Environmental Management Programme (EMPr), recommendations of participating specialists, conditions imposed by the Local Authority as part of the rezoning and subdivision, as well as the service agreements.

- To ensure the least possible damage to:
  - Existing infrastructure on and adjacent to the site;
  - Indigenous flora and fauna (biophysical environment); and
  - Water quality of surface and groundwater on and surrounding the site;
- Construction and development are undertaken with due consideration to all environmental factors;
- Where such damage occurs, provision is made for re-instatement and rehabilitation;

### 17.2 ACCEPTANCE OF REQUIREMENTS

To achieve these objectives, the Developer and EPC Contractor bind themselves jointly and severally to fulfil and comply with all the obligations contained herein, as well as prescriptions and obligations contained in other documents controlling the development of this Solar Energy Facility.

### 17.3 CONTRACTOR'S PRE-CONSTRUCTION OBLIGATIONS

Contractors may not commence any construction of this Solar Energy Facility until:

- The Contractor and the ECO have carried out a joint site inspection (this is to be done as part of the pre-construction compliance workshop as detailed in the EMPr above);
- A qualified ecologist has undertaken an inspection of the final development footprint and determined the number, species and extent of protected / listed plant species within this area;

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• <sup>27</sup> or delegated to the EPC contractor.

- A permit for the removal or relocation-and-transplant of any protected / listed plant species must be obtained, where necessary;
- Search and rescue of sensitive plants, within the development footprint has been carried out in compliance with the plant rescue and protection plan and signed off by the ECO (where this is necessary);
- The construction and no-go areas are suitably demarcated to the satisfaction of the ECO;
- Where necessary, approval of Building / Construction Plans has been obtained from the local authority; and
- All contract staff have attended the required environmental induction training and on-going environmental education sessions, as necessary.

#### **17.4 CONTRACTOR'S OBLIGATIONS DURING CONSTRUCTION**

- The Contractor is required to comply with the necessary Health and Safety requirements as required by the Occupational Health and Safety Act of 1993;
- The Contractor must comply with the construction requirements as detailed in the EMPr, including the following plans once they are completed prior to commencement of construction:
  - Transport & Traffic Management Plan,
  - Stormwater and Erosion-Control Management Plan,
  - Vegetation Clearing & Plant Rescue Plan (to be developed),
  - Re-vegetation & Rehabilitation Plan (to be developed),
  - Alien Management Plan (to be developed),
  - Open Space Management Plan (to be developed);
- The contractor must comply with all the requirements detailed in the Environmental Authorisation;
- All conditions, processes and fees as prescribed by the Local Authority must be complied with.

## **18. PENALTIES**

Should any person commit an action of non-compliance he/she may be convicted of an offence, in terms of Sub-regulation (1) of the National Environmental Management Act, to imprisonment for a period not exceeding ten years or to a fine not exceeding R10 Million as prescribed in terms of the Adjustment of Fines Act, 1991 (Act No. 101 of 1991).

Apart from a fine resulting from any legal mechanism, the ECO may advise the Employers Representative to impose a penalty for non-compliance in terms of this Environmental Management Programme (EMPr). The procedure detailed below is for a spot fine in terms of this EMPr and does not detail the procedure for fining in terms of any other legal mechanism.

### **18.1 PROCEDURES**

The contractor shall comply with the environmental specifications and requirements of this EMPr, the EA and Section 28 of NEMA, on an on-going basis and any failure on his part to do so will entitle the ER to impose a penalty.

In the event of non-compliance, the following recommended process shall be followed:

- The ECO shall issue a notice of non-compliance to the employer's representative, stating the nature and magnitude of the contravention. A copy shall be provided to the Project Developer / Proponent.
- The Employers Representative will issue this notice to the Contractor.
- The Contractor shall act to correct the transgression within the period specified by the Employers Representative.

- The Contractor shall provide the Employers Representative with a written statement describing the actions to be taken to discontinue the non-compliance, the actions taken to mitigate its effects and the expected results of the actions. A copy shall be provided to the Project Developer / Proponent.
- In the case of the Contractor failing to remedy the situation within the predetermined period, the Employers Representative shall impose a monetary penalty (spot fine) based on the conditions of contract.
- Should the transgression be a blatant disregard of conditions of the EMPr or EA, the Employers Representative (on advice from the ECO) can at their discretion immediately issue a fine and require the remediation (without first giving the contractor a chance to remediate).
- In the case of non-compliance giving rise to physical environmental damage or destruction, the Employers Representative shall be entitled to undertake or to cause to be undertaken such remedial works as may be required to make good such damage and to recover from the Contractor the full costs incurred in doing so.
- In the event of a dispute, difference of opinion, etc. between any parties in regard to or arising out of interpretation of the conditions of the EMPr, disagreement regarding the implementation or method of implementation of conditions of the EMPr or EA etc. any party shall be entitled to require that the issue be referred to specialists for determination.
- The Employers Representative on advice from the ECO shall always have the right to stop work and/or certain activities on site in the case of non-compliance or failure to implement remediation measures.

## 18.2 OFFENCES AND PENALTIES

Any avoidable non-compliance with the conditions of the EMPR shall be considered sufficient ground for the imposition of a monetary penalty by the Employers Representative.

Possible offences, which should result in the issuing of a contractual penalty, include, but are not limited to:

- Unauthorised entrance into no-go areas;
- Catching and killing of wild animals, and removal or damage to conservation-worthy plant species;
- Open fires outside of the contractor camp site and insufficient fire control;
- Unauthorised damage to natural vegetation;
- Unauthorised camp establishment (including stockpiling, storage, etc.);
- Hydrocarbons / hazardous material: negligent spills / leaks and insufficient storage;
- Ablution facilities: non-use, insufficient facilities, insufficient maintenance;
- Insufficient solid waste management (including clean-up of litter, unauthorised dumping etc.);
- Erosion due to negligence / non-performance;
- Excessive cement / concrete spillage / contamination;
- Non-induction of staff.

## 19. ABBREVIATIONS

AIA	Archaeological Impact Assessment
BGIS LUDS	Biodiversity Geographic Information System Land Use Decision Support
CBA	Critical Biodiversity Area
CDSM	Chief Directorate Surveys and Mapping
CEMPr	Construction Environmental Management Programme

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DEFF	Department of Environment, Forestry and Fisheries
DEA&NC	Department of Environmental Affairs and Nature Conservation
DME	Department of Minerals and Energy
DSR	Draft Scoping Report
EAP	Environmental Impact Practitioner
EHS	Environmental, Health & Safety
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
ESA	Ecological Support Area
GPS	Global Positioning System
GWh	Giga Watt hour
HIA	Heritage Impact Assessment
I&APs	Interested and Affected Parties
IDP	Integrated Development Plan
IFC	International Finance Corporation
IPP	Independent Power Producer
kV	Kilo Volt
LUDS	Land Use Decision Support
LUPO	Land Use Planning Ordinance
MW	Mega Watt
NEMA	National Environmental Management Act
NEMBA	National Environmental Management: Biodiversity Act
NERSA	National Energy Regulator of South Africa
NHRA	National Heritage Resources Act
NPAES	National Protected Area Expansion Strategy
NSBA	National Spatial Biodiversity Assessment
NWA	National Water Act

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PM	Post Meridien; "Afternoon"
PSDF	Provincial Spatial Development Framework
S.A.	South Africa
SACAA / CAA	South African Civil Aviation Authority
SAHRA	South African National Heritage Resources Agency
SANBI	South Africa National Biodiversity Institute
SANS	South Africa National Standards
SDF	Spatial Development Framework
TOPS	Threatened and Protected Species

# **Appendix A : Site Layout Plan – Doornhoek PV**

# **Appendix B : DFFE Generic EMPr for sub-station and powerline infrastructure (DFFE, 2019)**

# **Appendix C : Stormwater Management Plan**



# **Appendix D : Transportation and Traffic Management Plan**

**Appendix E : Construction Method  
Statements (to be appended once  
approved by the ECO)**

# Appendix F : EAP CV