



ENVIRONMENTAL MANAGEMENT PROGRAMME ADDENDUM

for

HOTAZEL SOLAR BATTERY ENERGY STORAGE SYSTEM

on

Remainder Farm York A 279 and Grid connection on
Remainder of Farm 280 and

Portion 11 of Farm York A 279

In terms of the

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

Prepared for Applicant: ABO Wind Hotazel PV (Pty) Ltd

By: Cape EAPrac

Report Reference: JMO543/16

Department Reference: 14/12/16/3/3/2/1086/AM2 (2022-09-
0036)

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PURPOSE OF THIS REPORT:

For implementation by EPC & O&M / BESS contractor

APPLICANT:

ABO Wind Hotazel PV (Pty) Ltd

CAPE EAPRAC REFERENCE NO:

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ADDENDUM TO ENVIRONMENTAL MANAGEMENT PROGRAMME

in terms of the

National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended & Environmental Impact Regulations 2010

HOTAZEL SOLAR– Battery Energy Storage System

Remainder Farm York A 279.

Submitted for:

Stakeholder Review & Comment

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ORDER OF REPORT

Environmental Management Programme - Legislated Requirements Checklist

Environmental Management Programme for Battery Energy Storage– Main Report

- Appendix A:** Site Development Plan .
- Appendix B:** Environmental Management Programme for main facility
- Appendix C:** Environmental Authorisation for main facility
- Appendix D:** Battery Energy Storage Risk Assessment

ENVIRONMENTAL MANAGEMENT PROGRAMME 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.

Compliance checklists in terms of these requirements are included in table 1 below.

Table 1: EMPr compliance with Appendix 4 of Regulation 982

| 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 Louise Mari van Zyl Assisted by Dale Holder of Cape EAPrac Ms van Zyl and Mr Holder have more than 17 years experience in environmental assessment. |
| A detailed description of the aspects of the activity that are covered by the EMPr as identified by the project description. | <p>This EMP covers all aspects of the project as currently under assessment, namely the addition of a battery energy storage system for the Authorised Hotazel Solar.</p> <p>This EMPr for the Battery Energy Storage System must be read in conjunction with the EMPr for the overall facility attached in Appendix B of this report. The main facility EMPr attached in Appendix B deals with the other components of the authorised development such as:</p> <ul style="list-style-type: none"> • PV Arrays and Mounting Structures; • inverter stations; • on-site substation; • grid connection • auxiliary buildings, • laydown area; • internal electrical reticulation network (underground cabling); • internal road / track network; • access road; • electrified perimeter fencing. |
| 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>The Site Development Plan 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 SDP as well as all areas outside of the perimeter fencing of the BESS are considered as no go areas for construction activities. Please refer to the main facility EMPr attached in appendix B for details relating to the environmental sensitivities applicable to the remainder of the development.</p> |
| A description of the impact management objectives, including management statements, identifying the impacts | <u>Section 3 of this EMPr.</u> |

| Requirement | Description |
|--|--|
| <p>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> <ul style="list-style-type: none"> (i) Planning and design; (ii) Pre-construction activities; (iii) Construction activities; (iv) Rehabilitation of the environment after construction and where applicable post closure; and (v) Where relevant, operation activities. | |
| <p>A description and identification of impact management outcomes required for the aspects contemplated above.</p> | <p><u>Table 5 in section 2 of the EMPR</u></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"> (i) Avoid, modify, remedy control or stop any action, activity or process which causes pollution or environmental degradation; (ii) Comply with any prescribed environmental management standards or practises; (iii) Comply with any applicable provisions of the Act regarding closure, where applicable; and (iv) Comply with any provisions of the Act regarding financial provisions for rehabilitation, where applicable. | <p><u>Throughout the report. Summarised in Section 13 of the EMPr.</u></p> |
| <p>The method of monitoring the implantation of the impact management actions contemplated above.</p> | <p><u>Section 8.</u></p> |
| <p>The frequency of monitoring the implementation of the impact management actions contemplated above.</p> | <p><u>Section 8.</u></p> |
| <p>An indication of the persons who will be responsible for the implementation of the impact management actions.</p> | <p><u>Figures 1 & 2 and Section 8</u></p> |
| <p>The time periods within which the impact management actions must be implemented.</p> | <p>Throughout the EMPr</p> |
| <p>The mechanism for monitoring compliance with the impact management actions.</p> | <p><u>Section 8</u></p> |
| <p>A program for reporting on compliance, considering the requirements as prescribed in the Regulations.</p> | <p><u>Section 8</u></p> |
| <p>An environmental awareness plan describing the way –</p> | <p><u>Section 4.2 and 4.3</u></p> |

| Requirement | Description |
|--|---|
| (i) The applicant intends to inform his or her employees of any environmental risk which may result from their work; and (ii) Risks must be dealt with in order to avoid pollution or the degradation of the environment. | |
| Any specific information that may be required by the competent authority. | A high-level risk assessment form part of the Addendum to the EMPr for the facility. This high-level risk assessment is attached in Appendix D. |

DEA COMMENT ON EMPR

This section will be updated on receipt of comment from the competent authority.

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ABBREVIATIONS

| | |
|----------------------|---|
| AC | Alternating Current |
| Alt. | Alternative |
| BESS | Battery Energy Storage System |
| CARA | Conservation of Agricultural Resources Act (43 of 1983) |
| CBA | Critical Biodiversity Area |
| CDSM | Chief Directorate Surveys and Mapping |
| DEFF | Department of Environment Forestry and Fisheries |
| DEANC | Department of Environmental Affairs & Nature Conservation (Northern Cape) |
| DEIR | Draft Environmental Impact Report |
| DoE | Department of Energy |
| DWS | Department of Water and Sanitation |
| EA | Environmental Authorisation |
| EAP | Environmental Impact Practitioner |
| ECO | Environmental Control Officer |
| EIA | Environmental Impact Assessment |
| EIR | Environmental Impact Report |
| ESA | Environmental Site Agent / Ecological Support Area |
| EMPr | Environmental Management Programme |
| ER | Engineers Representative |
| ha | Hectare |
| I&APs | Interested and Affected Parties |
| IPP | Independent Power Producer |
| KI / Klt | Kilo Litre |
| Km | Kilometre |
| Km/h | Kilometres per hour |
| kV | Kilo Volt |
| LLRC | Low Level River Crossing |
| lt | Litre |
| m | Metre |
| m² | Metres squared |
| m³ | Metres cubed |
| MW | Mega Watt |
| No. | Number |
| PM | Post Meridiem; "Afternoon" |
| PV | Photovoltaic |
| REDs | Road Environmental Dust Suppressant |
| SAHRA | South African National Heritage Resources Agency |
| SANBI | South Africa National Biodiversity Institute |
| SANS | South Africa National Standards |
| SKA SA | Square Kilometre Array South Africa |
| WULA | Water Use Licence Application |

1. INTRODUCTION

Cape EAPrac has been appointed by the Applicant, ABO Wind Hotazel PV (Pty) Ltd, as the independent **Environmental Assessment Practitioner** (EAP) responsible for preparation of the Addendum to the **Environmental Management Programme** (EMPr) for Hotazel Solar. The purpose of this revision is to include the relevant environmental management actions and outcomes associated with the proposed addition of a Battery Energy Storage System (BESS) within the authorised footprint of the facility.

This EMPr addendum deals specifically with the proposed BESS, and must be read in conjunction with the EMPr for the main facility as appended in Appendix B. The provisions within the original EMPr (Appendix B) and the existing Environmental Authorisation (EA) remain in force and are applicable to the remainder of the Facility. Furthermore, this EMPr must be read in conjunction with the BESS Risk Assessment attached in Appendix D as well as the amendment to the original EA (once it is issued).

This EMPr is a management tool used to minimise and mitigate the potential environmental impacts associated with the BESS, while at the same time, maximising the benefits.

A detailed description of the proposed project and a description of the affected environment are provided in the Amendment Assessment Report compiled by Cape EAPrac (JMO543/14) which should be referred to where necessary.

This EMPr is submitted in compliance with the National Environmental Management Act (NEMA, Act 107 of 1998, as amended) for the proposed amendment to the EA for this facility.

It must be noted that the EA for this facility includes a condition that requires that the final EMPr be submitted to the competent authority for approval, prior to the commencement of construction activities. This condition remains in force regardless of the submission of this Revised EMPr.

1.1. EMPr Approval & Revisions

This EMPr must be read in conjunction with the original EMPr (Appendix B) and once authorised, becomes a legally binding document. Contravention with this document constitutes a contravention with the Environmental Authorisation as amended.

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

- Incorporation of conditions of approval contained in the Environmental Authorisation or any amendment thereto;
- Outcome of a technology specific BESS risk assessment;
- 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.

Should an amendment of any of the EMPr objectives be required, an application for this must be submitted to the competent authority and approved before such changes are implemented. Changes to the EMPr actions may be affected without the need for an amendment process,

subject to approval by the ECO. In such an instance, a formal amendment will have to be affected as part of the first environmental audit report.

1.2. Contractual Obligation

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 on the activities associated with the construction and operation of the BESS. The overall EMPr in Appendix B is relevant and binding on the remainder of the activities associated with the development as a whole.

For the Construction phase, the EPC Contractor (including any sub-contractors) must ensure that sufficient budget is allocated to the implementation of this EMPr until such time as final rehabilitation is completed.

For the operational phase, the O&M Contractor (including any sub-contractors) must ensure that sufficient budget is allocated to the Operational requirements in this EMPr.

1.3. Organisational Requirements

In order 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:

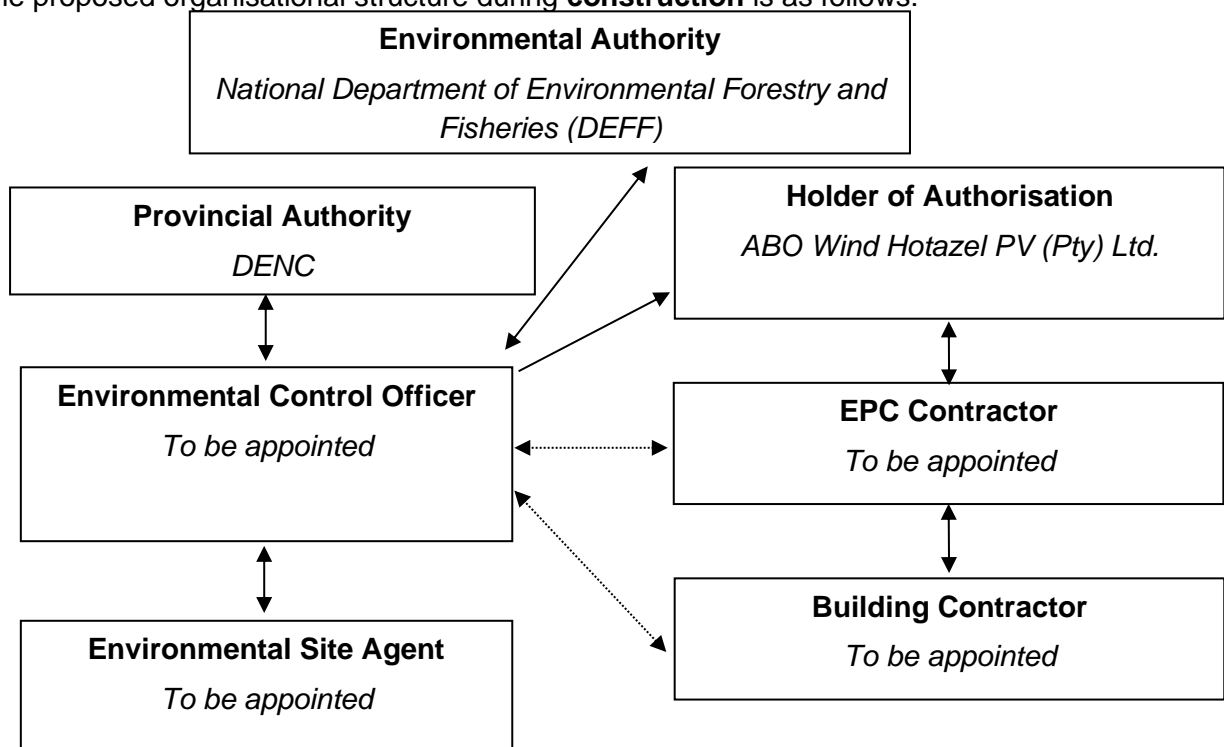


Figure 1: EMPr organisational structure during the construction phase

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

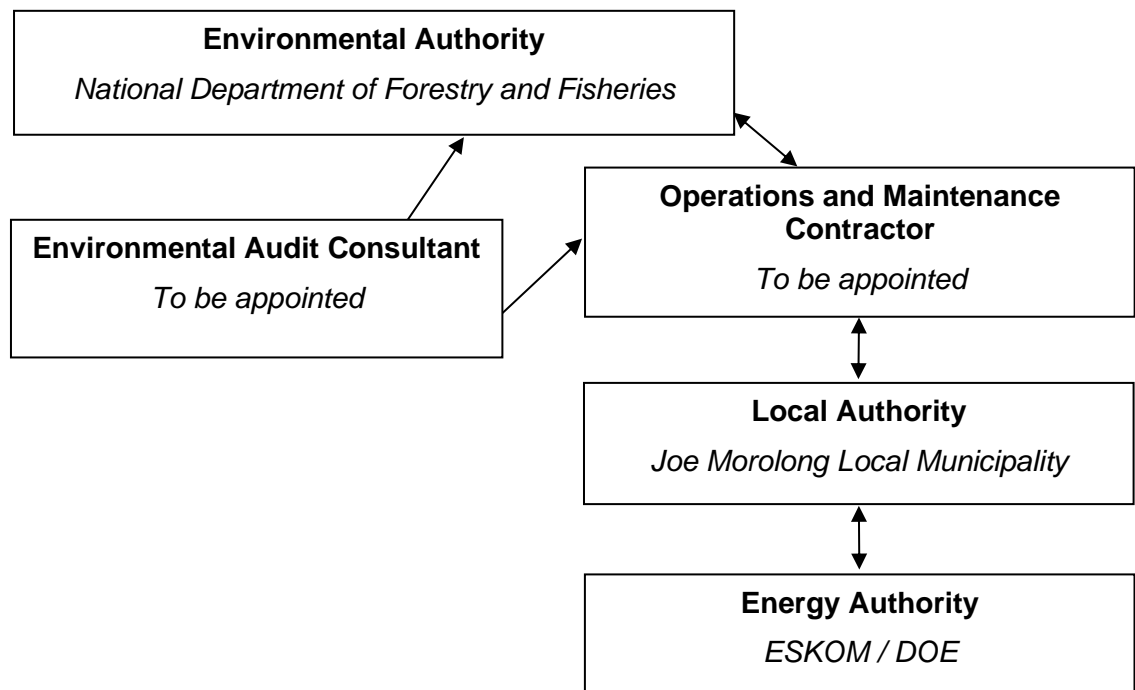


Figure 2: EMPr organisational structure during the operation phase.

This Organisational chart should be updated once the relevant parties are appointed in terms of this EMPr.

Details regarding the roles and responsibilities of the various parties in these organisational structures are included in Section 2 below.

1.4. Project Proposal

The proposal associated with this amendment includes the construction and operation of a BESS of up to 5ha within the authorised footprint of the facility.

The positioning of the BESS followed a risk adverse approach whereby the sensitive features identified by participating specialists were avoided when determining its position within the authorised project footprint.

1.5. 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.

These four phases can generally be categorised as follows.

1.5.1 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).

1.5.2 Construction Phase

The construction phase of the development refers to the vegetation and earthworks as well as the actual construction of the BESS.

1.5.3 Operation Phase

The operational phase commences once the facility starts providing power into the national grid (Contract Operational 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 includes the monitoring and maintenance activities required for the efficient functioning of the facility.

1.5.4 Closure and Decommissioning Phase

Closure and decommissioning refer to the decommissioning and recycling of the BESS at the end of their operational lifespan (after the period defined in the Power Purchase Agreement, or before).

2 ROLES AND RESPONSIBILITIES

Throughout the lifespan of this project, several individuals and entities will fulfil various roles and responsibilities to ensure the effective implementation of this EMPr. The key roles and responsibilities are detailed in the table below.

Table 2: Roles and responsibilities regarding the implementation of this EMPr.

| Responsible Parties | Role and responsibilities |
|--|--|
| Environmental Authority – National Department of Forestry, Fisheries and the Environment. | <p><u>Role</u></p> <p>The National Department of Environment, Forestry and Fisheries is the competent / delegated authority responsible for compliance with the relevant environmental legislation, namely the National Environmental Management Act and other Specific Environmental Management Acts (SEMA's)</p> <p><u>Responsibilities</u></p> <ul style="list-style-type: none"> • Ensure overall compliance with the Environmental Authorisation (EA) & EMPr. • Review this document and any revisions thereof. • Undertake site audits at their discretion. • Review ECO Reports. • Review Audit Reports • Review Incident Reports. • Enforce legal mechanisms for contraventions of this EMPr and EA. |
| Holder of the Authorisation – ABO Wind Hotazel PV (Pty) Ltd. | <p><u>Role</u></p> <p>The holder of the Authorisation is ultimately responsible and legally liable for ensuring compliance with all statutory requirements relating to the solar facility.</p> <p><u>Responsibilities</u></p> <ul style="list-style-type: none"> • Ensuring compliance with the conditions set out in the Environmental Authorisation and the amendment thereto (BESS amendment) issued in terms of the NEMA, as well as those prescribed by other relevant legislation and guidelines. • Compliance with the requirements set out in this EMPr. • Ensuring all other permits, permissions and licences from all other statutory departments are in place. E.g.: Permit from provincial Department of Environmental Affairs & Nature Conservation (DEANC) to translocate or remove <i>protected</i> plants. |
| Environmental Control Officer (ECO) – To be appointed | <p><u>Role</u></p> <p>The ECO fulfils an advisory role to monitor, guide and report compliance with the EMPr.</p> <p><u>Responsibilities</u></p> <ul style="list-style-type: none"> • Revise, update and amend the EMPr if necessary and submit the amendments to the competent authority for consideration. • Ensure all relevant persons have a copy of the EMPr and any amendments thereof. • Advise the employer's representative on any additional environmental authorisations and permits that may be required. • Facilitate the Environmental Education / Induction Training with the contract staff. • Review and comment on Method Statements relevant to environmental management and make recommendations to the employer's representative. • Report any non-compliance with the EMPr or EA to the employer's representative and competent authority if necessary. • Undertake regular site inspections in compliance with this EMPr. • Monitor, audit and verify that all works comply with the EA and the EMPr. • Keep record of EMPr implementation, monitoring and audits, including a full photographic record of works. |

| | |
|---|---|
| | <ul style="list-style-type: none"> • Comply and submit regular Environmental Control Reports to the competent authority, as well as employer's representative and/ holder of the authorisation. • Report any environmental incidents or environmental impacts immediately to the employer's representative and the competent authority if necessary. • Report any environmental incidents or environmental impacts immediately to the employer's representative and the competent authority if necessary. • Assist the contractor and employer's representative planning for and implementing environmentally sensitive problem solving. • Advise the employer's representative on suggested "stop work" orders. |
| Environmental Site Agent (ESA) – To be appointed | <p><u>Role</u></p> <p>To assist the ECO with the day to day implementation and monitoring of the environmental management actions that are taking place on site. The EAS should also be independent of the EPC contractor</p> <p><u>Responsibilities</u></p> <ul style="list-style-type: none"> • Day to day environmental control of contractors on site during the construction phase. • Monitoring of construction management activities during the construction phase. • Weekly reporting to the ECO. |
| Employers Representative – To be appointed | <p><u>Role</u></p> <p>The Employer's representative role is likely to be fulfilled by the project engineer /project engineer and assumes overall delegated responsibility for compliance with this EMPr, the EA, the conditions of the Planning Approval, Conditions of the WULA and all applicable legislation for the duration of the construction phase.</p> <p><u>Responsibilities</u></p> <ul style="list-style-type: none"> • Issue site instructions to the contractor based on the advice of the ECO. • Ensure that all detailed design incorporates the requirements of the EMPr and EA. • Ensure that the EMPr is included in all tender documents issued to prospective contractors and sub-contractors. • Ensure the EMPr is included in final contract documents. • Ensure that the Tenderers/Contractors adequately provide for compliance with the EMPr in their submissions. • Ensure that the EMPr is fully implemented by the relevant persons. • Ensure the contractor provides the necessary method statements. • Be accountable, to the competent authority for any contravention or non-compliance by the Contractor. • Assist the contractor with input from the ECO in finding environmentally responsible solutions to problems. • Undertake regular site audits, site visits and inspections to ensure that the requirements of the EMPr are implemented • Give instructions on any procedures and corrective actions on advice from the ECO. • Report environmental incidents or non-compliance with the EA or EMPr to the environmental authority. • Issue spot fines, penalties or 'stop-work' orders for contravention of the EMPr and give instructions regarding corrective action. |
| Landowner – P A C Jansen | <p><u>Role</u></p> <p>The landowner is responsible for compliance with legislation applicable to the management of the remainder of the property.</p> <p><u>Responsibilities</u></p> <p>E.g.: In terms of the National Veld & Forest Fires Act (101 of 1998) - an owner on whose land is subject to a risk of veldfire or whose land or part of it coincides with the border of the Republic, must prepare and maintain a firebreak on his or her land as close as possible to the border.</p> |

3 LEGISLATIVE FRAMEWORK

The applicable legislation remains the same as what was considered in the Final Environmental Impact Assessment Report and EMPr for Hotazel Solar and as such it is not re-described in this Revised EMPr.

The table below lists the applicable legislation and describes whether any additional considerations are applicable to the amendment (i.e. that were not considered in the final EIR).

Table 3: Legislation applicable Hotazel Solar including any additional considerations applicable to the amendment of the EA to include the BESS.

| Legislation | Additional considerations for Hotazel Solar |
|---|---|
| NATIONAL LEGISLATION | |
| The Constitution of the Republic of South Africa | No additional considerations applicable to the amendment |
| National Environmental Management Act (NEMA) | This application is being undertaken in terms of this legislation. No additional activities listed in terms of this legislation are applicable to the Amendment. |
| National Environmental Management: Biodiversity (Act 10 of 2004) | The proposed positioning of the BESS within the authorised footprint remains on vegetation type classified as least concern in terms of this legislation (Kathu Bushveld). No additional impact or permitting requirements (TOPS permits) are applicable to this amendment. |
| Conservation of Agricultural Resources Act – CARA (Act 43 of 1983): | No additional considerations applicable to the amendment. |
| The Subdivision of Agricultural Land, Act 70 Of 1970 | No additional considerations applicable to the amendment |
| National Water Act, No 36 of 1998 | No additional considerations applicable to the amendment |
| National Forests Act (No. 84 of 1998): | No additional considerations applicable to the amendment |
| National Heritage Resources Act, 25 of 1998 | SAHRA have approved the development footprint in terms of Section 38 of the National Heritage Resources Act. This authorised footprint remains unchanged and it is thus unlikely that further approval in terms of the NHRA will be applicable. SAHRA will however be given an opportunity to comment on this revised EMPr. |
| National Energy Act (No. 34 of 2008) | No additional considerations applicable to the amendment. |
| PROVINCIAL LEGISLATION | |
| Northern Cape Nature Conservation Act, No. 9 of 2009 | No additional considerations applicable to the amendment |
| Nature and Environmental Conservation Ordinance, No 19 of 1974 | No additional considerations applicable to the amendment |
| Astronomy Geographic Advantage Act, 2007 (Act No 21 Of 2007) | SARAO provided comment on the main facility. SARAO and SKAsa will be given an opportunity to provide additional comment on this proposed amendment. |
| Northern Cape Provincial Spatial Development Framework (PSDF) 2012 | No additional considerations applicable to the amendment. |
| GUIDELINES, POLICIES AND AUTHORITATIVE REPORTS | |
| National Protected Area Expansion Strategy (NPAES) for S.A. 2008 (2010) | No additional considerations applicable to the amendment. The project footprint remains unchanged and thus outside of any protected area expansion focus areas. |
| Critical Biodiversity Areas | No additional considerations applicable to this amendment. The project footprint remains unchanged and thus still outside of any critical biodiversity areas. |
| White Paper on the Renewable Energy Policy of the Republic of South Africa (2003) | No additional considerations applicable to the amendment |
| White Paper on the Energy Policy of the Republic of South Africa (1998) | No additional considerations applicable to the amendment |
| Integrated Energy Plan (IEP), 2015 | No additional considerations applicable to the amendment. |

| Legislation | Additional considerations for Hotazel Solar |
|---|---|
| Integrated Resource Plan for Electricity (2010-2030) | No additional considerations applicable to the amendment |
| National Development Plan 2030 (2012) | No additional considerations applicable to the amendment. |
| Strategic Infrastructure Projects (SIPs) | No additional considerations applicable to the amendment. |
| The Convention on the Conservation of Migratory Species of Wild Animals | No additional considerations applicable to the amendment. |
| Guidelines to minimise the impacts on birds of Solar Facilities and Associated Infrastructure in South Africa | No additional considerations applicable to the amendment. The monitoring regime remains the same as was assessed. |
| Environmental Impact Assessment Guideline for Renewable Energy Projects | No additional considerations applicable to the amendment. |
| Sustainability Imperative | No additional considerations applicable to the amendment. |

Section 24N of NEMA deals with the Principles of Environmental Management, which are summarised in the Table below.

Table 4: Compliance with Section 24N of NEMA

| EMPr Provision | Report Reference |
|--|--|
| 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 in respect of planning & design . | This is addressed in Sections 4 , |
| 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 in respect of pre-construction and construction activities . | This is addressed in Sections 4 . |
| 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 in respect of the operation or undertaking the activity in question. | This is addressed in Sections 6 |
| 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 in respect of the rehabilitation of the environment. | This is addressed in Section 6 & 7 of this EMPr – It has also been dealt with under construction requirements for the specific reason that these works must take place during the construction phase. |
| 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 in respect of closure , if applicable | This is dealt with in Section 7 of the EMPr. |
| Details and expertise of the person who prepared the EMPr. | These details are included at the beginning of the report (after cover page and report conditions). |
| A detailed description of the aspects of the activity that are covered by the EMPr. | This is dealt with under the introduction in Section 1 , this EMPr. |
| Information identifying the persons who will be responsible for the implementation of the measures addressed in the EMPr. | This is dealt with in Section 2 , of this EMPr. |

| EMPr Provision | Report Reference |
|---|--|
| Information in respect of mechanisms proposed for monitoring compliance with the EMPr and for reporting on the compliance. | This is dealt with in Section 8 of this EMPr. |
| Measures to rehabilitate the affected environment. | This is dealt with in Sections 5 & 6 of this EMPr as well as in appendix D-G. |
| Description of the manner in which pollution will be prevented and remedied. | This is dealt with throughout the EMPr, but specifically in Sections 5 & 7 |
| The EMPr must furthermore, where appropriate; | |
| Set out time periods within which measures must be implemented. | This is dealt with throughout the EMPr and summarised in section 13 . |
| Contain measures regulating responsibilities for any environmental damage. | This is dealt with is 14 of this EMPr. |
| Develop an environmental awareness plan describing the way the applicant intends to inform his or her Employees of any environmental risks and how to deal with these risks in order to avoid pollution or degradation of the environment. | This is dealt with in Sections 4.3 & 4.4 of the EMPr. |

In addition to the above, the Holder of the Authorisation (in this case the holder of the amendment of the EA to incorporate BESS) is bound by “Duty of Care”, as described in Section 28 of NEMA (107 of 1998, as amended), which “...*obliges every person who causes, has caused or may cause significant environmental degradation to take reasonable measures to prevent such degradation from occurring, continuing or recurring*”. Thus, all mitigation measures recommended by the relevant authorities and specialists must be implemented to avoid occurrence, continuation or repeat of environmental degradation.

4 DESIGN & PRE-CONSTRUCTION PHASE

The following management considerations are to be adopted and implemented during the design and pre-construction phase of the BESS.

- A detailed technology specific risk assessment (for the selected equipment) must be developed to replace the generic risk assessment in Appendix D of this EMPr.
- All personnel who will be handling the BESS Units must receive appropriate training.
- All hardware needs to be sourced from reputable manufacturers.
- A standard operating procedure for delivery and handling of the BESS units must be developed and implemented.
- All BESS Units to be inspected prior to delivery to site.
- Development and implementation of Thermal Management Plan.
- Appropriate warnings and Standard Operating Procedure for emergency events must be developed and must be provided to the local emergency services and the applicable staff on site.
- Prior to commencement of the activity, a dedicated Battery Recycling Programme must be compiled and adopted.

All other pre-construction provisions as detailed in the main EMPr (Appendix B) must be adopted and implemented, these must include all the outcomes and actions summarised in section 12 of the main facility’s EMPr.

5 CONSTRUCTION PHASE ENVIRONMENTAL MANAGEMENT

The items contained in this section of the EMPr must be implemented during the construction phase of the development of the Hotazel PV BESS.

5.1 Water Supply

OUTCOME: To ensure water used during construction of the BESS is lawfully and sustainably utilised.

The contractor must ensure a supply of water is available on site for sanitation, drinking, and dust suppression during the construction of the BESS.

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.25⁰C, pH: between 5.5 and 7.5 and conductivity: not be increased more than 15% above the intake water and not exceed 250 milli-Siemens per metre (determined at 25⁰C). The water used for dust suppression is likely to be borehole water / municipal water, and not treated effluent. This item is specific to water supply during the construction phase.

5.2 Topsoil Handling

OUTCOME: To ensure that the handling of topsoil does not result in the pollution or loss of the resource.

In terms of best practice and for rehabilitation purposes, it is essential that a 150mm layer of topsoil from the affected BESS footprint be stripped and stockpiled prior to the commencement of construction activities in each area.

Topsoil is of utmost importance for use in rehabilitation of disturbed areas and should therefore under no circumstances be mixed with sub-soils. Since the panels are to be installed using low impact pile installation, topsoil from underneath the panel arrays must be left in situ.

The following actions regarding topsoil handling must be considered:

- A minimum 300mm layer of topsoil or in shallow surface areas, up to bedrock level must be stripped from BESS Footprint (i.e. within the BESS perimeter fence);
- The topsoil stockpile site must be approved by the ECO and may not be within the sensitive areas as defined by the participating specialists;
- The topsoil stockpile must be within the approved footprint of the total development;
- The topsoil may not be stockpiled within any of the remaining natural areas. An existing disturbed area should rather be chosen for this purpose;
- The topsoil stockpile must be protected from erosion and dust as indicated by the ECO and this EMPr;
- The topsoil must be replaced into disturbed areas. It is important to note that rehabilitation in the BESS area will be extremely limited, so topsoil stripped from this area can be used for rehabilitation on the remainder of the PV Plant;
- The topsoil stockpile mustn't be deeper than 1m;
- A minimum buffer area of 20m should be around the topsoil stockpile in which no work may take place;

- The topsoil stockpile must be barricaded to inhibit unwanted vehicle movement around it and
- Topsoil must be moved once when stockpiling and back to disturbed areas during rehabilitation, no double handling.

5.3 Transport & Traffic Management

OUTCOME: To ensure that delivery of BESS equipment to site does not generate unacceptable traffic impacts.

The Transport Study and Traffic Management plan in section 7 (pg 36) of the main facility EMP (Appendix B) must be adopted and implemented.

5.4 Concrete Management

OUTCOME: To ensure that the handling of concrete does not result in pollution of soil or water resources.

Proper concrete management is of utmost importance. Concrete works are likely to be quite extensive within the BESS footprint (but limited for the remainder of the development).

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. Mass batching of concrete on site should be limited as far as possible.

The following actions must be implemented regarding the delivery of concrete to site:

- Trucks should deliver pre-mixed concrete to the site and pour the concrete directly into the prepared excavations (i.e. the foundations of the BESS).
- 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; and
- Any spillages of concrete outside of the excavations (including haulage routes) must be cleaned up immediately by the supplier.

5.5 Cable Trenches

OUTCOME: To ensure that trenching activities between the BESS and the Substation / PV field are restricted and do not result in loss of topsoil resources.

All AC cabling should run parallel to the BESS Access road as far as possible. 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. 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. In this regard, cable trenches should follow the contours of the land as far as possible.

The following actions must be implemented by the contractor:

- 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);
- The planning and selection should be done in approximation to the SDP and cognisance shall be given to minimising the potential for soil erosion;
- Trench routes with permitted working areas shall be clearly defined and marked with prior to excavation;
- The stripping and separation of topsoil and subsoil shall occur as stipulated by the Engineer's Representative (ER). Soil shall be stockpiled for use as backfilling as directed by the ER with input from the ECO;
- Trench lengths shall be kept as short as practically possible before backfilling and compacting;
- 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 approved by the ER with input from the ECO;
- Stockpiled topsoil must be replaced at the top of excavated trenches (except where these fall within an area to be hard surfaced); and
- Open trenches must be inspected daily for faunal entrapment (small mammals and reptiles). These are to be removed before backfilling of the trenches.
- Topsoil may not be used for bedding or blanket material in trenches. Bedding and Blanket Material must be obtained from a commercial source.

5.6 Management of archaeological resources

OUTCOME: To ensure that works within the BESS area do not result in significant loss of archaeological resources.

Should any archaeological and/or paleontological remains, including (but not limited to) fossil bones, fossil shells, coins, indigenous ceramics, colonial ceramics, marine shell heaps, stone artefacts, bone remains, rock art, rock engravings and any antiquity be discovered during construction, the ECO should safeguard these (preferably *in situ*) and report the find immediately to the South African Heritage Resources Council (SAHRA) and the Northern Cape Heritage Resources Authority (NCHRA), so that they are not disturbed further until the necessary guidance and approval have been obtained and the appropriate action (e.g. recording, sampling or collection) can be taken by a professional archaeologist or palaeontologist.

5.7 Noise Management

OUTCOME: To ensure nuisance from noise and vibration does not occur.

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

- It is recommended that noise generation be kept to a minimum and that construction activities be confined to normal working hours (08:00 - 17:00 on workdays). Should the Contractor / Engineer wish to deviate from these work hours, this must be discussed during the Pre-Construction / Initial Environmental Compliance Workshop with the ECO and recorded in the necessary Method Statements;
- Provide baffle and noise screens on noisy machines as necessary;
- Provide absorptive linings to the interior of engine compartments;
- Ensure machinery is properly maintained (fasten loose panels, replace defective silencers);
- Switch off machinery immediately when not in use; and
- Reduce impact noise by careful handling.

The Contractor shall 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).

5.8 Dust Control & Management

OUTCOME: To ensure there is no health risk or loss of amenity due to emission of dust to the environment, as a result of the construction of the BESS.

Every effort to minimize dust pollution on the site must be undertaken. The contractor must implement the following measures with regards to the management of dust on site:

The following actions are required in this regard.

- Construction vehicles must adhere to speed limits and minimization of haul roads must be implemented;
- During dry, dusty periods haul roads should be kept dampened to prevent excess dust. No potable water may be used for damping haul roads;
- All vehicles used to deliver or remove loose material (sand, soil, gravel etc.) to and from site must be covered with a 60% shade cloth to avoid dust blowing from the vehicle.
- As an alternative, products such as Road Environment Dust Suppressants (REDS) would be recommended in order to minimize the use of water to control dust pollution. This is to be determined by the ECO during construction as required;
- Exposed stockpile materials must be adequately protected against wind (covered) and should be sited in consideration of the prevailing wind conditions;
- Dust nuisances shall comply with the applicable standards according to the Occupational Health and Safety (Act No. 85 of 1993). The contractor shall be solely responsible for the control of dust arising from the contractor's operations and for any costs against the Employer for damages resulting from dust;
- The contractor shall take all reasonable measures to minimise the generation of dust as a result of construction activities to the satisfaction of the ER;
- Removal of vegetation shall be avoided until such time as soil stripping is required and similarly exposed surfaces shall be re-vegetated or stabilised as soon as is practically possible;
- Excavation, handling and transport of erodible materials shall be avoided under high wind conditions or when a visible dust plume is present;

- During high wind conditions the site manager, with input from the ECO, must evaluate the situation and make recommendations as to whether dust damping measures are adequate, or whether work should cease altogether until the wind speed drops to an acceptable level;
- Where possible, soil stockpiles shall be in sheltered areas where they are not exposed to the erosive effects of the wind. Where erosion of stockpiles becomes a problem, erosion control measures shall be implemented at the discretion of the site manager.
- Vehicle speeds shall not exceed 40km/h along dust roads or 20km/h when traversing unconsolidated and non-vegetated areas.
- Should water be used for dust suppression on the BESS access road or platform, it must be of a quality compliant with the General Special Effluent Standards (31/03/2009): Temperature: max.25⁰C, pH: between 5.5 and 7.5 and conductivity: not be increased more than 15% above the intake water and not exceed 250 milli-Siemens per metre (determined at 25⁰C). The water used for dust suppression must be sourced from a licenced resource.
- Dust monitoring must be done 2 months prior to construction to get a baseline and continue during construction.

5.9 Security Fencing

OUTCOME: To ensure that fencing protects project assets while limiting impact on faunal passages.

As the BESS is completely contained within the total perimeter of the facility, the additional fences surrounding the BESS footprint do not have to comply with the faunal requirements relating to the height of electrified strands as detailed in the Project EMPr (Appendix B).

5.10 Blasting

OUTCOME: To ensure any unlikely blasting activities do not disturb sensitive environmental nor social features.

It is unlikely that blasting will be required. Should blasting be required for construction of the BESS foundations or AC trenching, the following actions must be implemented:

- No blasting may take place within 50m of a borehole without approval of a suitably qualified engineering geologist;
- A current and valid authorisation shall be obtained from the relevant authorities and copied to the ER prior to any blasting activity;
- A method statement shall be required for any blasting related activities;
- All laws and regulations applicable to blasting activities shall be adhered to at all times;
- A qualified and registered blaster shall supervise all blasting and rock splitting operations at all times;
- 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);
- The contractor shall allow for good quality vibration monitoring equipment and record keeping on site at all times during blasting operations;
- The contractor shall ensure that emergency services are notified, in writing, a minimum of 24 hours prior to any blasting activities commencing on site;

- The contractor shall take necessary precautions to prevent damage to special 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 ER and the ECO;
- The contractor shall ensure that adequate warning is provided immediately prior to all blasting. All signals shall also be clearly given;
- The contractor shall use blast mats for cover material during blasting. Topsoil may not be used as blast cover;
- During demolition, the contractor shall ensure, where possible, that trees in the area are not damaged;
- Appropriate blast shaping techniques shall be employed to aid in the landscaping of blast areas, and a method statement to be approved by the ER, shall be required in this regard; and
- At least one week prior to blasting, the relevant occupants/owners of surrounding land shall be notified by the contractor and any concerns addressed.

5.11 Stormwater, Wash water and Erosion Management

OUTCOME: To ensure that stormwater and wash water do not cause erosion or pollution of the receiving environment.

The Stormwater, Erosion and Wash water Management Plan that formed part of the original Environmental Process must be adopted and implemented by the holder of the EA amendment. The following key actions are required:

- To limit soil erosion, construction activities (more specifically clearing of land) should be limited to the dry season (May to October) as far as possible.
- Construction activities should be limited to areas outside of the 1:100-year flood line.
- Upstream and downstream berms, for each construction site, should be implemented during the pre-construction and construction phases of the project. Upstream diversions will ensure limited surface flows through construction areas. Downstream berms will ensure that sediments eroded from within the construction site will be trapped, therefore reducing the impact to the downstream receiving environment. It is recommended that the berms are constructed out of a non-erodible material, such as sandbags with plastic liners.
- Materials excavated during the construction phase should be deposited in areas outside of drainage lines and stormwater channels. This will ensure minimal contact between concentrated stormwater runoff and the excavated materials.
- Machinery used during the construction process should be regularly (at least daily) checked for oil leaks. During periods where the machinery is not in use, drip trays should be placed under the machinery to contain any spillages.
- Fuels and hydrocarbon stores used during the construction phase should be lined and bunded such that spills from the store areas will not enter the receiving environment.
- Clearing of vegetation for construction purposes must be undertaken in accordance with a method statement. The method statement must include the method of clearing, recovery of and disposal of vegetation.

- Any pollution of land or watercourses that may occur in the unlikely event of BESS unit failure must be cleaned up by a qualified service provider and rehabilitated to its original state.

5.12 Fire Management and Protection

OUTCOME: To reduce the risk of fire to infrastructure and environment.

A BESS thermal / fire management plan and risk assessment must be developed prior to commencement of construction. These plans must be specific to the specific technology service providers and will be for the purpose of preventing equipment and environmental damage as a result of equipment fires.

As far as wildfires are concerned, the solar 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 very high rainfall, sufficient biomass may build up to carry fires. Therefore, management of plant biomass in areas surrounding the BESS will be required. Utilisation of non-selective herbicides for the management of biomass is prohibited on site.

The following general actions (specific BESS actions to be included in the management plan referred to above) must however be considered with regards to fire protection on site:

- No fires for cooking or heating should be allowed within the perimeter of the BESS;
- **No fuelwood collection** should be allowed on-site;
- The **total removal of all invasive alien vegetation** should take place on the entire project site in order 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;
- Cigarette butts may not be thrown in the veld but must be disposed of correctly. The contractor, with input from the ECO, must **designate smoking areas** (in compliance with the Tobacco Products Control Amendment Act 63 of 2008) with suitable receptacles for disposal;
- In case of an emergency, the **contact details of the local fire and emergency services** must be readily available;
- Emergency personal must be appropriately trained on how to deal with a fire as a result of the BESS;
- Contractors must ensure that **appropriate firefighting equipment and suitably qualified/experienced personal** are available on site at all times, as per the specifications defined by the health and safety representative / consultant;
- The fire risk on site is a point of discussion that must take place as part of the pre-construction compliance workshop and the environmental induction training prior to commencement of construction;
- The contractor must also comply with the requirements of the Occupational Health and Safety Act with regards to fire protection; and
- A standard operating procedure for both BESS and wildfires must be developed prior to construction of these facilities.

5.13 Sanitation during Construction

OUTCOME: To ensure safe and healthy sanitation for construction staff without increasing pollution risk.

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:

- Toilet and washing facilities must be available to the site personnel at all times;
- These facilities must be situated within the site camp and away from any washes or drainage lines;
- One toilet for every 15 personnel is required;
- The facilities must be serviced on a regular basis to prevent any overflow or spillage;
- The servicing contractor must dispose of the waste in an approved manner (e.g. via the municipal wastewater treatment system);
- The ECO must be provided with the service providers' details and the service schedule for the site;
- The toilets should be secured to ensure that they do not blow over in windy conditions;
- All toilet facilities must be removed from site on completion of the contract period; and
- Should the construction period be interrupted by a builder's break, the toilets should be emptied prior to the break.

Sanitation during operation is discussed above under the design criteria in Section 4.7.

5.14 Fuel Storage

OUTCOME: To ensure lawful fuel storage that does not cause soil and water pollution.

Fuel storage may not take place within the BESS footprint, but rather at the nearby Site Camp / Laydown area. The following actions must be implemented with regards to fuel storage:

- Temporary fuel storage must take place within the contractors site camp in an area approved by the ECO;
- No storage of fuel may take place on any other portion of the site;
- 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;
- Mobile fuel units used to refuel plant on site must make use of drip trays when refuelling;
- Storage facilities may not be located within 60m of the on-site drainage lines or where there is a potential for any spilled fuel to enter a watercourse or groundwater;
- Fuel storage facilities should be located on flat ground. No cut and fill should take place immediately on or adjacent to fuel storage areas;
- All storage tanks should be double lined and be ISO 9001 certified;
- All storage tanks must be enclosed by bund walls;
- Bund walls must be constructed to contain at least 110% of the total capacity of the storage tanks;
- Bund walls must be constructed of impermeable material or lined to ensure that petroleum products cannot escape;

- In the event that the bunded area is a pit that is dug and lined with plastic, adjustments must be made to allow for invertebrates to escape as the plastic doesn't provide any traction and become pitfall traps.
- A suitable material should be placed in the base of the bund walls to soak up any accidental spillages;
- The tanks should be locked and secured when not in use;
- Automatic shut-off nozzles are required on all dispensing units;
- 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;
- 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;
- Defective hoses, valves and containment structures should be promptly repaired;
- 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 are captured and cleaned up;
- 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
- Spill kits must be made available on-site for the clean-up of spills.
- Should the BESS include Inverters/transformers that are not contained within the bunded battery containers, these must also be bunded to 110% of their capacity

5.15 Construction Waste Management

OUTCOME: To ensure the management of waste is both lawful and sustainable.

5.15.1 Litter management

Wind and scavenger proof bins must be installed within the BESS footprint and must be emptied on a weekly basis.

5.15.2 Construction Rubble and Waste

All construction rubble must be disposed of at an approved site established and registered for this purpose (no construction rubble may be spoiled anywhere on site). A list must be compiled before construction of any existing building rubble on site to avoid disputes. NO construction rubble may be used as fill in landscaping or any other areas on site.

5.15.3 Scrap Metal

Recycling of scrap metal is recommended. Scrap metal must be disposed of off-site at suitable facilities (e.g. municipal dump registered for this purpose).

5.15.4 Hazardous Waste

All hazardous waste (including chemicals, bitumen, fuel, lubricants, oils, paints etc.) shall be disposed of at an approved / registered hazardous-waste landfill site. The Contractor shall provide disposal certificates to the ECO.

Used oil and grease must be removed from site to an approved used oil recycling company.

Under NO circumstances may any hazardous waste be spoiled on the site.

Major services and maintenance of construction and delivery vehicles should take place off-site.

Washing of construction and personal vehicles are strictly prohibited on site unless it is done on an impermeable surface that flows into an evaporation pit. The contents of the pit will then be carted off site at the end of the project.

Damaged BESS units are considered hazardous and may be considered a waste product. Any damaged units must be removed from site by the original equipment manufacturer or a designated service provider. No repair to damaged units may take place on site.

5.16 Theft and Other Crime

OUTCOME: To ensure that activities on site do not increase the criminal activity of the area.

An increase in crime during the construction phase is often a concern. In the case of the proposed development, this is likely to be negligible due to the extremely 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 PV Footprint and the PV Laydown area/s will be fenced with a temporary fence to avoid theft during construction. The BESS area will however be fenced off by a permanent fence.

Additional security measures during construction could include cctv camera surveillance and security guards.

The following actions are relevant in this regard (refer to Section 5.9 above for details of the facility permanent fencing):

- All portable construction equipment and material must be locked away within the Contractor's Site Camp overnight and during holiday periods;
- Fuel storage tanks must be locked when not in use;
- All unassembled / un-installed PV materials must be locked within the fenced Laydown areas overnight and during holiday periods; and
- The minimum amount of lighting should be used at night and this should be of the low-UV emitting kind that attracts less insects.

It must be noted 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.

5.17 Plant Rescue and Protection.

OUTCOME: To reduce the impact on protected and sensitive botanical features.

The following environmental management actions applicable to the construction phase of the BESS are applicable.

5.17.1 Identification of species of conservation concern

The ToPS (Threatened and Protected Species) regulations provide for the regulation of activities which may directly or indirectly impact threatened and protected species. Such species are identified under NEMBA as well as by the National Red Data List of Plants. At a provincial level, the Northern Cape Nature Conservation Act (2009) also provides lists of species which are protected within the province. Species listed under the National Red Data List of Plants as well as those protected under the provincial legislation must be specified on permit applications required for site clearing.

A permit application must be made for any of these species within the BESS footprint and any requirements of this permit once issued must be complied with.

5.17.2 Mitigation & avoidance options

Where listed plant species fall within the BESS footprint it is unlikely that avoidance will be possible. In this case, translocation of these should take place. However, not all species are suitable for translocation as only certain types of plants are able to survive the disturbance. Suitable candidates for translocation include most geophytes and succulents. Although there are exceptions, many woody species do not survive translocation well and it is generally not recommended to try and attempt to translocate such species.

5.18 Vegetation Clearing

OUTCOME: To ensure that vegetation is minimised and restricted to the development footprint.

It is unlikely that any vegetation will be left within the footprint of the BESS. Vegetation cleared within the footprint of the BESS must be stockpiled for use in the rehabilitation of the remainder of the site.

5.19 Animal Rescue & Protection

OUTCOME: To reduce the direct impact on animals affected by the construction activities.

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.

All trenches and open excavations 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.

5.20 Re-Vegetation & Habitat Restoration

OUTCOME: To restore habitat disturbed during construction activities.

As the BESS footprint will not include any undeveloped habitat, no revegetation actions will be required.

Any temporary laydown utilised for the BESS must be rehabilitated back to a natural state.

5.21 Alien Plant Management Plan

OUTCOME: To manage alien species in compliance with the AIS regulations.

The Hotazel Solar site is currently very lightly invaded by alien species. The density of alien species within the intact vegetation is generally very low and is restricted to disturbed areas around watering points. The total removal of all AIS must take place on the entire BESS footprint.

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

- Area contamination must be minimised by careful, accurate application with a minimum amount of herbicide to achieve good control.
- All care must be taken to prevent contamination of any water bodies. This includes due care in storage, application, cleaning equipment and disposal of containers, product and spray mixtures.
- Equipment should be washed where there is no danger of contaminating water sources and washings carefully disposed of in a suitable site.
- To avoid damage to indigenous or other desirable vegetation, products should be selected that will have the least effect on non-target vegetation.
- Coarse droplet nozzles should be fitted to avoid drift onto neighbouring vegetation.
- The appropriate health and safety procedures should also be followed regarding the storage, handling and disposal of herbicides.

5.22 Open Space Management

OUTCOME: To manage the undeveloped portions of the footprint to promote ecological diversity.

No open space will remain within the footprint of the BESS and as such, no additional actions for the BESS will be required.

6 OPERATIONAL PHASE ENVIRONMENTAL MANAGEMENT

The following environmental requirements are to be adopted and implemented during the operation phase of the BESS

6.1 End of Life Recycling of Battery Components

OUTCOME: To ensure that Battery components that have reached their end of life do not cause environmental degradation as a result of their disposal.

A dedicated battery recycling plan must be developed and implemented for the project. No battery components may be disposed of on site or at any landfill.

Units should ideally be sent back to the original equipment manufacturers in compliance with the battery recycling plan.

6.2 Management of Emergency Incidents

OUTCOME: To ensure that in the unlikely event of failure of any of BESS units, such failure does not result in environmental degradation or pollution.

The actions detailed in the detailed risk assessment, once compiled by the original equipment manufacturers must be implemented in this regard.

7 CLOSURE & DECOMMISSIONING PHASE ENVIRONMENTAL MANAGEMENT

After the lifespan of the facility (20-25 years), there is a possibility that the entire facility, including the BESS, 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.

Table 5: Legislative requirements for a closure plan

| Requirement | |
|-------------|--|
| (1) | A closure plan must include - |
| (a) | Details of - <ul style="list-style-type: none"> (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. |

| Requirement | |
|-------------|--|
| (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 way it intends to – <ul style="list-style-type: none"> (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 – <ul style="list-style-type: none"> (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; (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; (iv) Where applicable, an indication of the amendments made to the plan as a result of public participation processes conduction in terms of regulation 41 of these Regulations. |
| (j) | Where applicable, details of any financial provisions for the rehabilitation, closure and ongoing post decommissioning management of negative environmental impacts. |

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 (the Northern Cape Department of Environmental Affairs & Nature Conservation (DEANC) and the Department of Environment Forestry and Fisheries (DEFF)) for input and approval. This plan must provide detail pertaining to the recycling and disposal of BESS components, site restoration, soil replacement, landscaping, pro-active conservation, and a timeframe for implementation. Furthermore, the plan must comply with any additional legislation and guidelines that may be applicable at the time.

8 MONITORING AND AUDITING

Environmental monitoring and audits are fundamental in ensuring the implementation of the management actions contained within this EMPr, environmentally sustainable development and maintenance of the PV facility, including the BESS.

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: Department of Environmental Affairs & Nature Conservation (DENC);
- The national environmental authority: Department of Forestry, Fisheries and the Environment (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.

Appendix 7 of Regulation 982 of the 2014 EIA Regulations contains the required contents of an Environmental Audit Report. 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: Legislative requirements for an Audit report.

| (1) An Environmental audit report prepared in terms of these Regulations must contain: |
|---|
| (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. |
| (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. |

8.1 ECO Construction Monitoring

The ECO is responsible for environmental monitoring during construction as per the requirements of this EMPr. The monthly environmental monitoring reports compiled by the ECO, as well as the photographic record of works, must be submitted to the operators of the facility, the local authority, the provincial environmental authority, the national environmental authority and Eskom.

8.2 Recording and Reporting to the DEFF.

The following recording and reporting requirements are required:

- 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.

All documentation e.g. Audit/monitoring/compliance reports and notifications required to be submitted to the department in terms of the EA, must be submitted to the Director: Compliance monitoring.

8.3 Environmental Audit Report

The holder of the EA must submit an environmental audit report to the department within 30 days of completion of the construction phase (i.e. within 30 Days of site handover) and within 30 days of completion of rehabilitation activities.

This environmental audit report must:

- Be compiled an independent environmental auditor;
- Indicate the date of the audit, the name of the auditor and the outcome of the audit;
- Evaluate compliance with the requirements of the approved EMPr and the Environmental Authorisation;
- Include measures to be implemented to attend to any non-compliances or degradation noted;
- Include copies of approvals granted by other authorities relevant to the development for the reporting period;
- Highlight any outstanding environmental issues that must be addressed, along with recommendations for ensuring these issues are appropriately addressed;
- Include a copy of the EA and the approved EMPr;
- Include all documentation such as waste disposal certificates, hazardous waste landfill site licences etc, pertaining to this authorisation; and
- Include evidence of adherence to the conditions of this authorisation and the EMPr where relevant such as training records and attendance registers.

9 METHOD STATEMENTS

Method statements are written submissions by the Contractor to the Engineer and ECO in response to the requirements of this EMPr or in response to a request by the Engineer 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 Engineer 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 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; and
- Compliance / non-compliance with an EMP specification and motivation for proposed non-compliance.

9.1 Method Statements Required

Based on the specifications in this EMP, 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 and 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;
- Battery Recycling Plan;
- Standard Operating for BESS systems;
- Cement and concrete batching;
- Traffic, transport & delivery accommodation;
- Solid waste management / control procedures;
- Stormwater and wastewater management / control systems;
- Erosion remediation and stabilisation;
- Fire control and emergency procedures; and

- Job site security plan.

10 HEALTH AND SAFETY

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 aforesaid 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).*

11 CONTRACTORS CODE OF CONDUCT

The Contractor's Code of Conduct is a document to be drawn up by the solar facility Developer 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 the PV facility and must be signed by all contractors. **This code of conduct does not exonerate contractors from complying with this EMPr or the EMPr for the overall facility 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 the all service agreements.

11.1 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. Particularly the water quality entering and exiting the on-site washes/minor drainage lines;
- Construction and development are undertaken with due consideration to all environmental factors; and
- Where such damage occurs, provision is made for re-instatement and rehabilitation;

11.2 Acceptance of Requirements

In order to achieve these objectives, the Developer and 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 the PV facility inclusive of the BESS.

11.3 Contractor's Pre-Construction Obligations

Contractors may not commence any construction on the 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);
- 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 the BESS footprint;
- A permit for the removal or relocation-and-transplant of these protected / listed plant species has been obtained from the Kimberly office of the Northern Cape Department of Environmental Affairs & Nature Conservation (DEANC);
- Search and rescue of sensitive plants, within the development footprint has been carried out 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 has attended the required environmental induction training and on-going environmental education sessions, as necessary.

11.4 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 attached original EMPr (Appendix B), EA conditions (Appendix C) and Risk Assessment.
- 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; and
- The Contractor shall only be permitted to erect a single signboard which must comply with legislative requirements.

12 NON-COMPLIANCE

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 two years or to a fine not exceeding an amount 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 ER 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.

12.1 Procedures

The contractor shall comply with the environmental specifications and requirements of this EMPr, the Environmental Authorisation (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 ER, stating the nature and magnitude of the contravention. A copy shall be provided to the Project Developer / Proponent.
- The ER will issue this notice to the Contractor.
- The Contractor shall act to correct the transgression within the period specified by the ER.
- The Contractor shall provide the ER 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 time frame, the ER 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 ER (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 ER 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 ER 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.

12.2 Offences and Penalties

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

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; and
- Non-induction of staff.

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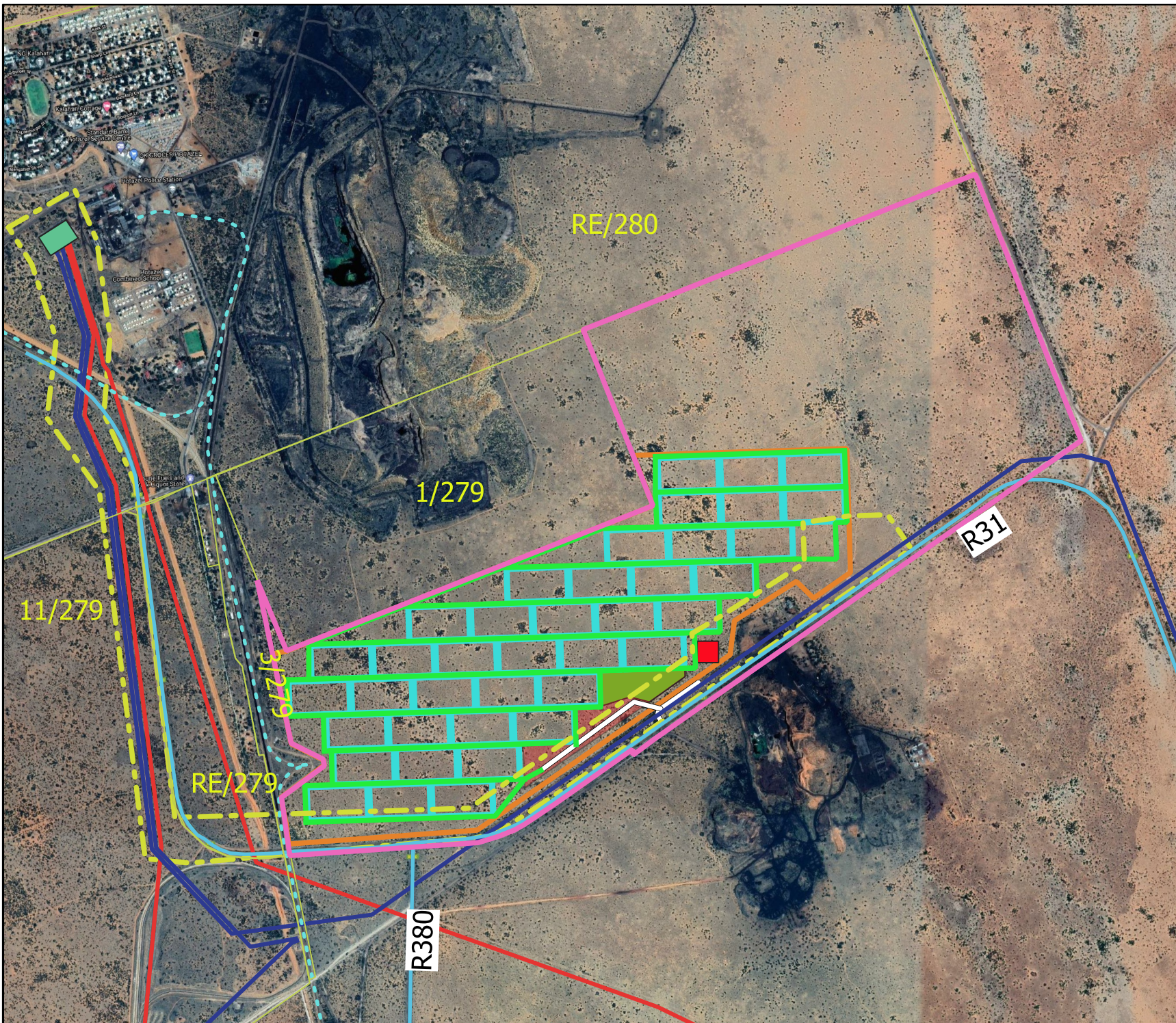
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KEY

Existing infrastructure

- Remainder of Farm York A 279
- - - Farm Boundaries
- Roads
- - - Railways
- Eskom Hotazel Substation
- Eskom 132 kV Line
- Eskom 66 kV Line

Proposed layout components

- - - Grid Connection Corridor
- Internal Road network
- Access along Existing Farm Road
- PV Array
- On-site substation
- Temporary Laydown area
- BESS area
- Site Boundary

| Description | By | Date | Rev |
|--|---------------|--------------------|-----|
| <p>Registered address: ABO WIND ABO Wind renewable energies (Pty) Ltd Unit B1, Mayfair Square Century Way, Century City 7441</p> | | | |
| Project Hotazel Solar | | | |
| Title BESS amendment | | | |
| File - | | | |
| Project code 9301 | Drawing 02 | Date 06/07/2021 | |
| Scale N/a | | Drawn ZH | |



ENVIRONMENTAL MANAGEMENT PROGRAMME

REVISION 1

for

HOTAZEL SOLAR

on

**On Remaining Extent (Portion 0) of the farm York A 279, District of Hotazel in the Northern
Cape Province**

In terms of the

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



Prepared for Applicant: ABO Wind Hotazel PV (Pty) Ltd

By: Cape EAPrac

Report Reference: JMO543/07

Department Reference: 14/12/16/3/3/2/1086

Case Officer: Vincent Chauke

Date: 24 August 2018

APPOINTED ENVIRONMENTAL ASSESSMENT PRACTITIONER:

Cape EAPrac Environmental Assessment Practitioners

PO Box 2070

George

6530

Tel: 044-874 0365

Fax: 044-874 0432

Report written & compiled by: **Dale Holder** (Nat.Diploma Nature Conservation) who has 12 years experience as an environmental practitioner.

PURPOSE OF THIS REPORT:

For implementation by EPC & O&M contractor

APPLICANT:

ABO Wind Hotazel PV (Pty) Ltd

CAPE EAPRAC REFERENCE NO:

JMO543/07

DEPARTMENT REFERENCE:

14/12/16/3/3/2/1086

SUBMISSION DATE

24 August 2018

TO BE CITED AS:

Cape EAPrac, 2018. Environmental Management Programme – Revision 3: Hotazel Solar, On Remaining Extent (Portion 0) of the farm York A 279, District of Hotazel in the Northern Cape Province. Report Reference: JMO543/07.

DOCUMENT REVISION

| | |
|---|-----------------|
| Draft Environmental Management Programme (JMO543/07) | 03 October 2016 |
| Environmental Management Programme – Revision 2 (JMO543/07) | 06 July 2018 |
| Environmental Management Programme – Revision 3 (JMO543/07) | 24 August 2018 |

ENVIRONMENTAL MANAGEMENT PROGRAMME

in terms of the

National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended &
Environmental Impact Regulations 2010

Hotazel Solar

On Remaining Extent (Portion 0) of the farm York A 279, District of Hotazel in the Northern Cape Province

Submitted for:

Departmental Review

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ORDER OF REPORT

Environmental Management Programme - Legislated Requirements Checklist

Environmental Management Programme – Main Report

- Appendix A:** Site Development Plan.
- Appendix B:** Stormwater, Erosion and Washwater Management Plan
- Appendix C:** Transport Study and Traffic Management Plan.
- Appendix D:** Plant rescue and protection plan.
- Appendix E:** Re-vegetation and Restoration Plan.
- Appendix F:** Alien Vegetation Management Plan.
- Appendix G:** Open Space Management Plan.
- Appendix H:** Curriculum Vitae of EAP.
- Appendix I:** Environmental Authorisation.
- Appendix J:** SAHRA Approval.
- Appendix K:** Waste Management Plan

ENVIRONMENTAL MANAGEMENT PROGRAMME LEGISLATIVE REQUIREMENTS

This EMP complies with the requirements in the acceptance of the Final Scoping Report as well as with Regulation 982 in terms of the 2014 Environmental Regulations.

Compliance checklists in terms of these three requirements are included in tables 1 – 2 below.

The table below serves to confirm the content requirements of the EMP, as specified in the Acceptance of the Final Scoping Report & Plan of Study for the Environmental Impact Assessment, issued by the national Department of Environmental Affairs.

Table 1: EMP compliance with conditions of the Final Scoping Report.

| Requirement | Description |
|---|----------------------------|
| All recommendations and mitigation measures to be recorded in the Final EIR. | Throughout EMP |
| The final site layout plan . | Appendix A |
| Measures as dictated by the final site layout plan and micro-siting . | Section 4 |
| An environmental sensitivity map indicating environmental sensitive areas and features identified during the EIA process. | Section 1.4 and Appendix A |
| A map combining the final layout plan superimposed (overlain) on the environmental sensitivity map . | Section 1.4 and Appendix A |
| An alien invasive management plan to be implemented during construction and operation of the facility. The plan must include mitigation measures to reduce the invasion of alien species and ensure that the continuous monitoring and removal of alien species is undertaken. | Appendix F |
| A plant rescue and protection plan which allows for the maximum transplant of conservation important species from areas to be transformed. This plan must be compiled by a vegetation specialist familiar with the site in consultation with the ECO and be implemented prior to commencement of the construction phase. | Appendix D |
| An open space management plan to be implemented during the construction and operation of the facility. | Appendix G |
| A re-vegetation and habitat rehabilitation plan to be implemented during the construction and operation of the facility including timeframes for restoration which must indicate rehabilitation within the shortest possible time after completion of the construction activities to reduce the amount converted at any one time and to speed up the recovery to natural habitats. | Appendix E |
| A storm water management plan to be implemented during the construction and operation of the facility. The plan must ensure compliance with applicable regulations and prevent off-site migration of contaminated storm water or increased soil erosion. The plan must include the construction of appropriate design measures that allow surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows. Drainage measures must promote the dissipation of storm water run-off. | Appendix B |
| An effective monitoring system to detect any leakage or spillage of all hazardous substances during their transportation, handling, use and storage. This must include precautionary measures to limit the possibility of oil and other toxic liquids from entering the soil or storm water systems. | Section 5 |
| An erosion management plan for monitoring and rehabilitating erosion events associated with the facility. Appropriate erosion mitigation must form part of this plan to prevent and reduce the risk of any potential erosion. | Appendix B |
| A traffic management plan for the site access roads to ensure that no hazards would result from the increased truck traffic and that traffic flow would not be adversely impacted. This plan must include measures to minimise impacts on local commuters e.g. limiting construction vehicles traveling on public roadways during the morning & late afternoon commute time and avoid using roads through densely populated built-up areas to not disturb existing retail & commercial operations. | Appendix C |
| A transportation plan for the transport of PV components, main assembly cranes and other large pieces of equipment. | Appendix C |
| Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants. | Section 4, 5 and 6 |

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.

Table 2: EMPr compliance with Appendix 4 of Regulation 982

| 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 who has more than 13 years' experience as an Environmental Assessment Practitioner. A company profile of Cape EAPrac as well as 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 under assessment.</p> <p>This includes the construction and operation of a photovoltaic (PV) solar facility with a generation capacity of 100Mw, including</p> <ul style="list-style-type: none"> • Inverter stations; • an on-site substation (including a feed-in transformer to allow the generated power to be connected to Eskom's electricity grid); • A132kV overhead powerline connecting to the project to the Hotazel Substation • auxiliary buildings, including: <ul style="list-style-type: none"> • administration / office & security (gate house), • control room & workshop, • visitor centre, • ablution / change room and • warehouse / storeroom. • a laydown area of approximately 3ha; • internal electrical reticulation network (underground cabling); • an internal road / track network ; • An access road of approximately 7.5m wide within a 15m servitude; • 10 x 10kLt rainwater tanks; and • electrified perimeter fencing around the solar facility, including security cameras. |
| <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 Site Development Plan 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 SDP as well as all areas outside of the perimeter fencing 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>Section 3 of this EMPr.</p> |

| Requirement | Description |
|--|--|
| (iv) Rehabilitation of the environment after construction and where applicable post closure; and (v) Where relevant, operation activities. | |
| A description and identification of impact management outcomes required for the aspects contemplated above. | Table 5 in section 2 of the EMPr |
| A description of the proposed impact management actions, identifying the manner in which the impact management objectives and outcomes contemplated above will be achieved and must, where applicable include actions to – (i) Avoid, modify, remedy control or stop any action, activity or process which causes pollution or environmental degradation; (ii) Comply with any prescribed environmental management standards or practises; (iii) Comply with any applicable provisions of the Act regarding closure, where applicable; and (iv) Comply with any provisions of the Act regarding financial provisions for rehabilitation, where applicable. | Throughout the report. Summarised in Section 13 of the EMPr. |
| The method of monitoring the implantation of the impact management actions contemplated above. | Section 8. |
| The frequency of monitoring the implementation of the impact management actions contemplated above. | Section 8. |
| An indication of the persons who will be responsible for the implementation of the impact management actions. | Figures 1 & 2 and Section 8 |
| The time periods within which the impact management actions must be implemented. | Throughout the EMPr |
| The mechanism for monitoring compliance with the impact management actions. | Section 8 |
| A program for reporting on compliance, taking into account the requirements as prescribed in the Regulations. | Section 8 |
| An environmental awareness plan describing the manner in which – (i) The applicant intends to inform his or her employees of any environmental risk which may result from their work; and (ii) Risks must be dealt with in order to avoid pollution or the degradation of the environment. | Section 4.2 and 4.3 |
| Any specific information that may be required by the competent authority. | Please refer to the table above, where the competent authorities specifically required information is addressed. |

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ABBREVIATIONS

| | |
|-------------------|---|
| AC | Alternating Current |
| Alt. | Alternative |
| BGIS | Biodiversity Geographic Information System |
| CARA | Conservation of Agricultural Resources Act (43 of 1983) |
| CBA | Critical Biodiversity Area |
| cctv | Closed Circuit Television (camera) |
| CDSM | Chief Directorate Surveys and Mapping |
| cm | Centimetre |
| DAFF | Department of Agriculture, Forestry & Fisheries |
| DEA | Department of Environmental Affairs (national) |
| DEA&DP | Department of Environmental Affairs & Development Planning (Western Cape) |

| | |
|----------------------|---|
| DEANC | Department of Environmental Affairs & Nature Conservation (Northern Cape) |
| DEIR | Draft Environmental Impact Report |
| DME | Department of Minerals and Energy |
| DoE | Department of Energy |
| DWS | Department of Water and Sanitation |
| EA | Environmental Authorisation |
| EAP | Environmental Impact Practitioner |
| ECA | Environmental Conservation Act (73 of 1989) |
| ECO | Environmental Control Officer |
| ECR | Environmental Control Report |
| EHS | Environmental, Health & Safety |
| EIA | Environmental Impact Assessment |
| EIP | Environmental Implementation Plan |
| EIR | Environmental Impact Report |
| ELC | Environmental Liaison Committee |
| ER | Engineer Representative |
| ESA | Environmental Site Agent / Ecological Support Area |
| EMPr | Environmental Management Programme |
| FPA | Fire Protection Association |
| GPS | Global Positioning System |
| ha | Hectare |
| HIA | Heritage Impact Assessment |
| I&APs | Interested and Affected Parties |
| IDP | Integrated Development Plan |
| IPP | Independent Power Producer |
| ISO | International Organisation for Standardisation (ISO 9001) |
| KI / Klit | Kilo Litre |
| Km | Kilometre |
| Km/h | Kilometres per hour |
| kV | Kilo Volt |
| LLRC | Low Level River Crossing |
| lt | Litre |
| LUDS | Land Use Decision Support |
| LUPO | Land Use Planning Ordinance |
| m | Metre |
| m² | Metres squared |
| m³ | Metres cubed |
| MW | Mega Watt |
| NCHRA | Northern Cape Heritage Resources Authority |
| NCNCA | Northern Cape Nature Conservation Act (9 of 2009) |
| NEMA | National Environmental Management Act (107 of 1998, as amended in 2006) |
| NEMBA | National Environmental Management: Biodiversity Act (10 of 2004) |
| NERSA | National Energy Regulator of South Africa |
| NFA | National Forest Act (84 of 1998) |
| NHRA | National Heritage Resources Act (25 of 1999) |
| No. | Number |
| NSBA | National Spatial Biodiversity Assessment |
| NVFFA | National Veld and Forest Fire Act (101 of 1998) |
| NWA | National Water Act (36 of 1998) |
| pH | Potential of Hydrogen |

| | |
|------------------|--|
| PIA | Paleontological Impact Assessment |
| PM | Post Meridien; "Afternoon" |
| PV | Photovoltaic |
| PVC | Polyvinyl Chloride (piping) |
| REDS | Road Environmental Dust Suppressant |
| SAHRA | South African National Heritage Resources Agency |
| SANBI | South Africa National Biodiversity Institute |
| SANS | South Africa National Standards |
| SDF | Spatial Development Framework |
| S&EIR | Scoping & Environmental Impact Reporting |
| SAPD | South Africa Police Department |
| WULA | Water Use Licence Application |

1. INTRODUCTION

Cape EAPrac has been appointed by the Applicant, ABO Wind Hotazel PV (Pty) Ltd, as the independent **Environmental Assessment Practitioner (EAP)** responsible for compilation of the **Environmental Management Programme (EMPr)** for the Hotazel Solar renewable energy development.

This EMPr is submitted in compliance with the National Environmental Management Act (NEMA, Act 107 of 1998, as amended) for the proposed development of Hotazel Solar Development near Hotazel in the Northern Cape.

ABO Wind Hotazel PV (Pty) Ltd. have an option to sub-lease a portion of the remainder of the On Remaining Extent (Portion 0) of the farm York A 279, District of Hotazel in the Northern Cape Province, from the landowner, Mr PAC Jansen (executor of the Estate of the late JP Jansen estate number 020517/2014), for the purposes of developing the proposed solar facility. A copy of a letter from Mr PAC Jansen (executor of the Estate of the late JP Jansen estate number 020517/2014) providing consent for the continuation of the EIA is attached in Annexure G5 of the Environmental Impact Report. Prior to construction, the abovementioned option agreement will be replaced by a Notarial Deed of lease.

The total generation capacity of the solar facility will not exceed **100MW** for input into the national Eskom grid.

The key purpose of this EMPr is to ensure that the remedial and mitigation requirements identified during the Scoping & Environmental Impact Reporting process 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.

1.1 EMPr APPROVAL & REVISIONS

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

The supplementary plans annexed to this EMP (Stormwater, Erosion and Washwater Management Plan, Transport Study and Traffic Management Plan, Plant rescue and protection plan, Re-vegetation and Restoration Plan, Alien Vegetation Management Plan and Open Space Management Plan.) must be read in conjunction with this EMPr and their legal status

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:

- Incorporation of conditions of approval contained in the Environmental Authorisation;
- 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.

Should a significant amendment to this EMPr be required, an application for this must be submitted to the competent authority and approved before such changes are implemented.

The relevant sections of this EMP have been updated to separately reflect the environmental outcomes and environmental actions.

1.2 CONTRACTUAL OBLIGATION

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 solar project, but also for all associated infrastructure upgrades required in order for this development to be undertaken, namely access road, substation, auxiliary buildings and internal roads).

1.3 ORGANISATIONAL REQUIREMENTS

In order 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:

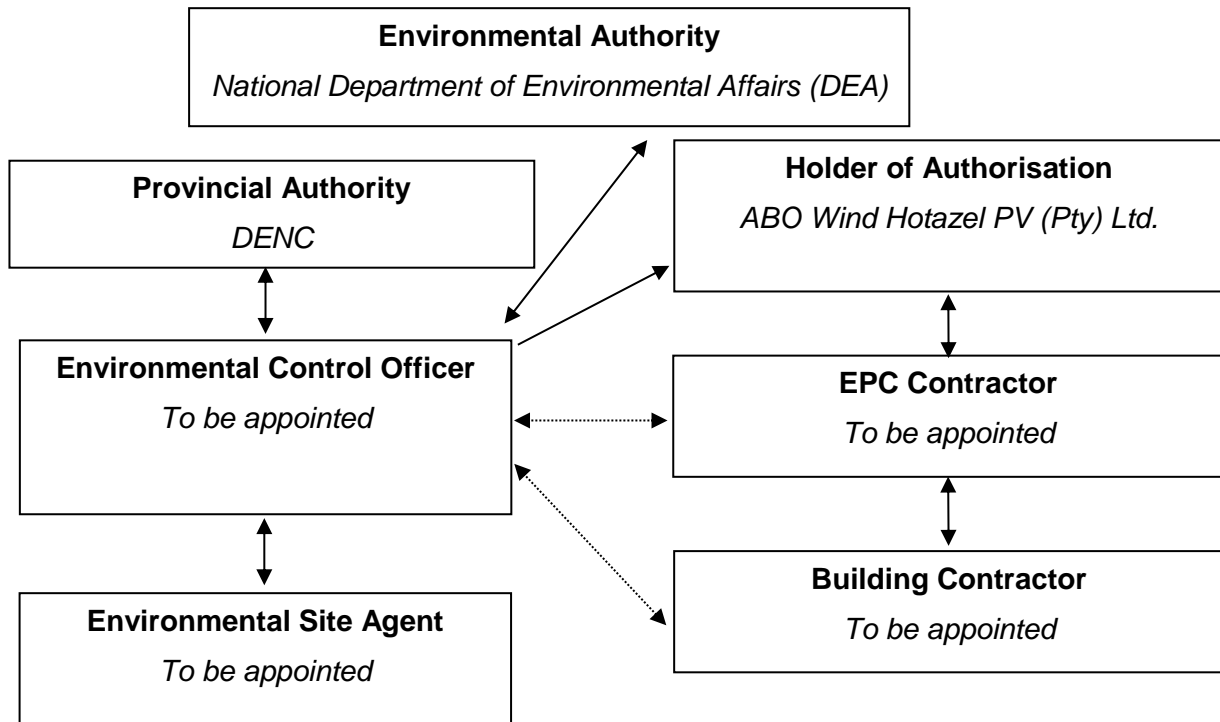


Figure 1: EMPr organisational structure during the construction phase

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

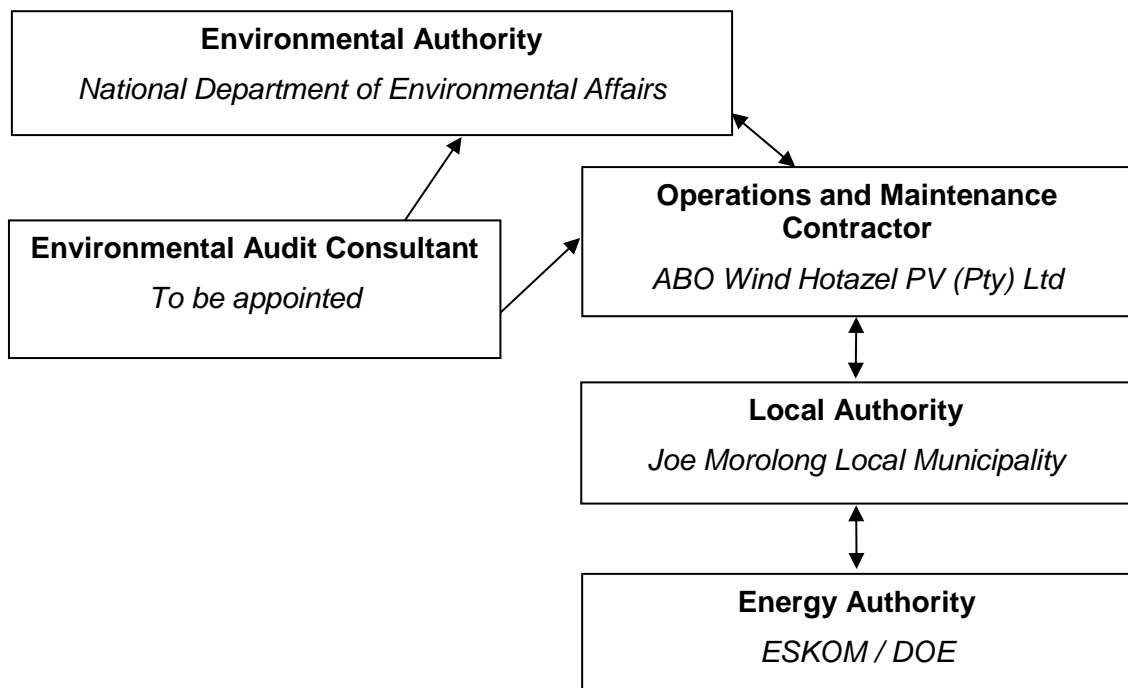


Figure 2: EMPr organisational structure during the operation phase.

Details regarding the roles and responsibilities of the various parties in these organisational structures are included in Section 2 below.

1.4 PROJECT PROPOSAL

The proposal includes the construction and operation of a photovoltaic (PV) solar facility with a generation capacity of **100Wp**. The PV technology will consist of Single Axis PV Trackers. In terms of the SDP, the following additional infrastructure will be constructed as part of this development:

- Inverter stations;
- an on-site substation (including a feed-in transformer, system metering and facility metering);
- an overhead transmission power line to distribute the generated electricity from the on-site substation to the Eskom Hotazel sub-station
- Integrated Admin/control building, including:
 - Monitoring building
 - administration / office & security (gate house),
 - control room & workshop,
 - visitor centre,
 - ablution / change room and
 - warehouse / storeroom.
- a laydown area (within the project footprint);
- internal electrical reticulation network (underground cabling);
- an internal road / track network
- 10 x 10kLt rainwater tanks; and
- electrified perimeter fencing around the solar facility, including security cameras.

This layout was developed to follow a risk adverse approach whereby the sensitive areas were eliminated from the layout. This EMP is specific to the Hotazel Solar development and its associated infrastructure. Please refer to the SDP attached in appendix A that shows the development area.

1.5 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.

These four phases can be generally categorised as follows.

1.5.1 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)

1.5.2 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 power lines, access roads and gate house. The construction phase will end with the perimeter fencing of the facility, landscaping and re-vegetation / rehabilitation of the site and surrounding areas.

1.5.3 Operation Phase

The operational phase commences once the facility starts providing power into the national grid. 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 panels, brush-cutting of vegetation etc.), as well as health and integrity of the surrounding environment (e.g. removal alien vegetation, removal of obstacles from drainage lines, management of erosion etc.).

1.5.4 Closure and Decommissioning Phase

Closure and decommissioning refers the decommissioning of the panel arrays at the end of their operational lifespan. For the purpose of this report, two possible scenarios are considered, namely:

- The re-use, repair &/ upgrade of the facility for alternative power generation;
- The total decommissioning of the solar facility.

Solar panels that are found to be functional (albeit it less efficient) after the upgrade or decommissioning of the facility could be re-used for other purposes (e.g. at local rural schools and clinics or other primary service providers).

2. ROLES AND RESPONSIBILITIES

Throughout the lifespan of this project, a number of individuals and entities will fulfil various roles and responsibilities to ensure the effective implementation of this EMP. The key roles and responsibilities are detailed in the table below.

Table 3: Roles and responsibilities with regard to the implementation of this EMP.

| Role | Responsibility |
|--|--|
| Environmental Authority – National Department of Environmental Affairs. | |
| The National Department of Environmental Affairs (DEA) is the competent / delegated authority responsible for compliance with the relevant environmental legislation. | <ul style="list-style-type: none"> • Ensure overall compliance with the Environmental Authorisation (EA) & EMP. • Review this document and any revisions thereof. • Undertake site audits at their discretion. • Review ECO Reports. • Review Audit Reports • Review Incident Reports. • Enforce legal mechanisms for contraventions of this EMP and EA. |
| Holder of the Authorisation – ABO Wind Hotazel PV (Pty) Ltd. | |
| The holder of the Authorisation is generally responsible for ensuring compliance with all statutory requirements relating to the Solar facility. | <ul style="list-style-type: none"> • Ensuring compliance with the conditions set out in the Environmental Authorisation issued in terms of the NEMA, as well as those prescribed by other relevant legislation and guidelines. • Compliance with the requirements set out in this EMP. • Ensuring all other permits, permissions and licences from all other statutory departments are in place. E.g.: Permit from provincial Department of Environmental Affairs & Nature Conservation (DEANC) to translocate or remove <i>Hoodia gordonii</i> plants. |

| Role | Responsibility |
|---|--|
| Environmental Control Officer (ECO) – To be appointed | |
| <p>The ECO fulfils an advisory role to monitor, guide and report compliance with the EMPr.</p> | <ul style="list-style-type: none"> • Revise, update and amend the EMPr if necessary and submit the amendments to the competent authority for consideration. • Ensure all relevant persons have a copy of the EMPr and any amendments thereof. • Advise the employer’s representative on any additional environmental authorisations and permits that may be required. • Facilitate the Environmental Education / Induction Training with the contract staff. • Review and comment on Method Statements relevant to environmental management and make recommendations to the employer’s representative. • Report any non-compliance with the EMPr or EA to the employer’s representative and competent authority if necessary. • Undertake regular site inspections in compliance with this EMPr. • Monitor, audit and verify that all works comply with the EA and the EMPr. • Keep record of EMPr implementation, monitoring and audits, including a full photographic record of works. • Comply and submit regular Environmental Control Reports to the competent authority, as well as employer’s representative &/ holder of the authorisation. • Report any environmental incidents or environmental impacts immediately to the employer’s representative and the competent authority if necessary. • Assist the contractor and employer’s representative planning for and implementing environmentally sensitive problem solving. • Advise the employer’s representative on suggested “stop work” orders. |
| Environmental Site Agent (ESA) – To be appointed | |
| <p>To assist the ECO with the day to day implementation and monitoring of the environmental management actions that are taking place on site.</p> | <ul style="list-style-type: none"> • Day to day environmental control of contractors on site during the construction phase. • Monitoring of construction management activities during the construction phase. • Weekly reporting to the ECO. |
| Employers Representative – To be appointed | |
| <p>The Employer’s representative role is likely to be fulfilled by the project engineer and assumes overall delegated responsibility for compliance with this EMPr, the EA, the conditions of the LUPO Approval, Conditions of the WULA and all applicable legislation for the duration of the construction phase.</p> | <ul style="list-style-type: none"> • Issue site instructions to the contractor based on the advice of the ECO. • Ensure that all detailed design incorporates the requirements of the EMPr and EA. • Ensure that the EMPr is included in all tender documents issued to prospective contractors and sub-contractors. • Ensure the EMPr is included in final contract documents. • Ensure that the Tenderers/Contractors adequately provide for compliance with the EMPr in their submissions. • Ensure that the EMPr is fully implemented by the relevant persons. • Ensure the contractor provides the necessary method statements. • Be accountable, to the competent authority for any contravention or non-compliance by the Contractor. • Assist the contractor with input from the ECO in finding environmentally responsible solutions to problems. • Undertake regular site audits, site visits and inspections to ensure that the requirements of the EMPr are implemented • Give instructions on any procedures and corrective actions on advice from the ECO. |

| Role | Responsibility |
|---|---|
| | <ul style="list-style-type: none"> • Report environmental incidents or non-compliance with the EA or EMPr to the environmental authority. • Issue spot fines, penalties or 'stop-work' orders for contravention of the EMPr and give instructions regarding corrective action. |
| Building Contractor – To be appointed | |
| The Contractor (main contractor) is responsible for the implementation of all construction activities associated with the Solar Facility. | <ul style="list-style-type: none"> • Overall project delivery for the construction of the Solar Facility to the satisfaction of the authorities and consultants. • Ensuring compliance with the Health & Safety requirements for the project. • Ensuring compliance with this Environmental Management Programme. • Promoting job safety and environmental awareness with Employees. • Ensure that all sub-contractors comply with this EMPr and all other statutory requirements. |
| Landowner – PAC Jansen (executor of the Estate of the late JP Jansen estate number 020517/2014) | |
| The landowner is responsible for compliance with legislation applicable to the management of the remainder of the property as a whole. | <ul style="list-style-type: none"> • E.g.: In terms of the National Veld & Forest Fires Act (101 of 1998) - an owner on whose land is subject to a risk of veldfire or whose land or part of it coincides with the border of the Republic, must prepare and maintain a firebreak on his or her land as close as possible to the border. |

3. LEGISLATIVE FRAMEWORK

Several pieces of legislation were considered during the development of this EMPr. The holder of the EA must ensure compliance with all relevant legislation including those detailed below and any others that may be relevant to the works to be undertaken.

3.1 THE CONSTITUTION OF THE REPUBLIC OF SOUTH AFRICA

The Constitution of the Republic of South Africa (Act 108 of 1996) states that everyone has a right to a non-threatening environment and that reasonable measures are applied to protect the environment. This includes preventing pollution and promoting conservation and environmentally sustainable development, while promoting justifiable social and economic development.

3.2 NATIONAL ENVIRONMENTAL MANAGEMENT ACT (NEMA, ACT 107 OF 1998, AS AMENDED)

The National Environmental Management Act (NEMA, Act 107 of 1998, as amended), makes provision for the identification and assessment of activities that are potentially detrimental to the environment and which require authorisation from the competent authority (in this case, the national Department of Environmental Affairs) based on the findings of an Environmental Impact Assessment (EIA). It also embraces the notion of sustainable development as contained in the Constitution of South Africa (Act 108 of 1996) in that everyone has the right:

- to an environment that is not harmful to their health or well-being; and
- to have the environment protected for the benefit of present and future generations through reasonable legislative and other measures.

NEMA requires that measures are taken that “*prevent pollution and ecological degradation; promote conservation; and secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development.*” In addition:

- That the disturbance of ecosystems and loss of biological diversity are avoided, or where they cannot be altogether avoided, are minimised and remedied;
- That a risk-averse and cautious approach is applied, which takes into account the limits of current knowledge about the consequences of decisions and actions; and

- Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure.

NEMA aims to provide for co-operative environmental governance by establishing principles for decision-making on all matters relating to the environment and by means of Environmental Implementation Plans (EIP) and Environmental Management Programmes (EMPr).

The Applicant may not undertake activities listed in terms of the NEMA without prior authorisation.

In compliance with **Section 24N** of NEMA, this EMPr must contain the following (over and above the content requirements listed in the Table 1 above):

Table 4: Compliance with Section 24N of NEMA

| EMPr Provision | Report Reference |
|---|--|
| 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 in respect of planning & design . | This is addressed in Sections 4 , |
| 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 in respect of pre-construction and construction activities . | This is addressed in Sections 4 . |
| 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 in respect of the operation or undertaking the activity in question. | This is addressed in Sections 6 |
| 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 in respect of the rehabilitation of the environment. | This is addressed in Section 6 & 7 of this EMPr – It has also been dealt with under construction requirements for the specific reason that these works must take place during the construction phase. |
| 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 in respect of closure , if applicable | This is dealt with in Section 7 of the EMPr. |
| Details and expertise of the person who prepared the EMPr. | These details are included at the beginning of the report (after cover page and report conditions). |
| A detailed description of the aspects of the activity that are covered by the EMPr. | This is dealt with under the introduction in Section 1 , this EMPr. |
| Information identifying the persons who will be responsible for the implementation of the measures addressed in the EMPr. | This is dealt with in Section 2 , of this EMPr. |
| Information in respect of mechanisms proposed for monitoring compliance with the EMPr and for reporting on the compliance. | This is dealt with in Section 8 of this EMPr. |
| Measures to rehabilitate the affected environment. | This is dealt with in Sections 5 & 6 of this EMPr as well as in appendix D-G. |
| Description of the manner in which pollution will be prevented and remedied. | This is dealt with throughout the EMPr, but specifically in Sections 5 & 7 |
| The EMPr must furthermore, where appropriate; | |
| Set out time periods within which measures must be implemented. | This is dealt with in throughout of the EMPr and summarised in section 13. |

| EMPr Provision | Report Reference |
|---|--|
| Contain measures regulating responsibilities for any environmental damage. | This is dealt with is 14 of this EMPr. |
| Develop an environmental awareness plan describing the manner in which the applicant intends to inform his or her Employees of any environmental risks and how to deal with these risks in order to avoid pollution or degradation of the environment. | This is dealt with in Sections 4.3 & 4.4 of the EMPr. |

In addition to the above, the Holder of the Authorisation is bound by “Duty of Care”, as described in Section 28 of NEMA (107 of 1998, as amended), which “...*obliges every person who causes, has caused or may cause significant environmental degradation to take reasonable measures to prevent such degradation from occurring, continuing or recurring*”. Thus, all mitigation measures recommended by the relevant authorities and specialists must be implemented to avoid occurrence, continuation or repeat of environmental degradation.

3.3 NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT (NEMBA) (ACT 10 OF 2004)

The National Environmental Management: Biodiversity Act (Act 10 of 2004) (NEMBA) provides for listing threatened or protected ecosystems, in one of four categories: critically endangered (CR), endangered (EN), vulnerable (VU) or protected. The Draft National List of Threatened Ecosystems (Notice 1477 of 2009, Government Gazette No 32689, 6 November 2009) has been gazetted for public comment.

The list of threatened terrestrial ecosystems supersedes the information regarding terrestrial ecosystem status in the NSBA 2004. In terms of the EIA regulations, a basic assessment report is required for the transformation or removal of indigenous vegetation in a critically endangered or endangered ecosystem regardless of the extent of transformation that will occur. **However, all of the vegetation types on both the study sites are classified as Least Threatened.** Please see the **ecological impact assessment** attached in **Annexure D1** in the Environmental Impact Report for further information.

NEMBA also deals with endangered, threatened and otherwise controlled species. The Act provides for listing of species as threatened or protected, under one of the following categories:

- **Critically Endangered:** any indigenous species facing an extremely high risk of extinction in the wild in the immediate future.
- **Endangered:** any indigenous species facing a high risk of extinction in the wild in the near future, although it is not a critically endangered species.
- **Vulnerable:** any indigenous species facing an extremely high risk of extinction in the wild in the medium-term future; although it is not a critically endangered species or an endangered species.
- **Protected species:** any species which is of such high conservation value or national importance that it requires national protection. Species listed in this category include, among others, species listed in terms of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

Certain activities, known as Restricted Activities, are regulated by a set of permit regulations published under the Act. These activities may not proceed without environmental authorization.

3.4 NORTHERN CAPE NATURE CONSERVATION ACT (NCNCA) (NO. 9 OF 2009)

The Northern Cape Nature Conservation Act provides inter alia for the sustainable utilisation of wild animals, aquatic biota and plants as well as permitting and trade regulations regarding wild fauna and flora within the province. In terms of this act the following section may be relevant with regards to any security fencing the solar development may require.

Manipulation of boundary fences: 19. No Person may –

- (a) *erect, alter, remove or partly remove or cause to be erected, altered, removed or partly removed, any fence, whether on a common boundary or on such person's own property, in such a manner that any wild animal which as a result thereof gains access or may gain access to the property or a camp on the property, cannot escape or is likely not to be able to escape therefrom.*

According to the SANBI SIBIS database, 286 indigenous plant species have been recorded from the quarter degree squares 2820 BD, DB and 2821 AC and CA. This includes 7 species of conservation concern as listed in the table below.

An ecological expert has will have to be appointed to undertake a detailed site walk through in support of an application for the removal of threatened plants in terms of this legislation. Any conditions of this licence, once issued, must be complied with by the contractor and the holder of the EA.

3.5 NATIONAL FORESTS ACT (NFA) (NO. 84 OF 1998):

The National Forests Act provides for the protection of forests as well as specific tree species, quoting directly from the Act: *"no person may cut, disturb, damage or destroy any protected tree or possess, collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree or any forest product derived from a protected tree, except under a licence or exemption granted by the Minister to an applicant and subject to such period and conditions as may be stipulated"*.

Protected species which occur in this habitat type include *Aloe dichotoma*.

Please refer to the **Ecological Impact Assessment Report** in **Appendix D, Annexure D1** of the EIR for a detailed description of the plant species found to occur in the area.

An ecological expert will have to be appointed to undertake a detailed site walk through in support of an application for the removal of threatened plants in terms of this legislation. Any conditions of this licence, once issued, must be complied with by the contractor and the holder of the EA.

3.6 NATIONAL VELD & FOREST FIRE ACT (NVFFA) (ACT 101 OF 1998)

The purpose of the National Veld and Forest Fire Act is to **prevent and combat veld, forest and mountain fires** throughout the Republic of South Africa and to provide institutions, methods and practices for achieving this purpose. Institutions include the formation bodies such as **Fire Protection Associations** (FPA's) and Working on Fire. The Act provides the guidelines and constitution for the implementation of these institutions, as well as their functions and requirements.

Every owner on whose land a veldfire may start or burn or from whose land it may spread must prepare and **maintain a firebreak on his or her side of the boundary between his or her land and any adjoining land**. The procedure in this regard and the role of adjoining owners and the fire protection association are dealt with within this Act. An owner on whose land is subject to a risk of veldfire or whose land or part of it coincides with the border of the Republic, must prepare and maintain a firebreak on his or her land as close as possible to the border.

The proposed solar site is arid and given the sparse, succulent nature of the vegetation, it is highly unlikely that fires are a normal occurrence in the area, and thus fires at the site are not considered to be a significant risk. However, under exceptional circumstances, such as following years of very high rainfall, sufficient biomass may build up to carry fires, especially in the fenced-off areas. Therefore, **management of plant biomass within the site** should be part of the management of the facility. Given the risk that this would pose to the development, it would be in the operators'

interests to manage plant cover at an acceptable level through grazing or alternative management practice (brush-cutting). Grazing by livestock is the simplest and most ecologically sound way to manage plant biomass and is recommended as the preferred method to manage plant biomass at the site (Todd, 2012 & 2013).

3.7 CONSERVATION OF AGRICULTURAL RESOURCES ACT – CARA (ACT 43 OF 1983):

CARA provides for the regulation of control over the utilisation of the natural agricultural resources in order to promote the conservation of soil, water and vegetation and provides for combating weeds and invader plant species. The Conservation of Agricultural Resources Act defines different categories of alien plants:

- Category 1 - prohibited and must be controlled;
- Category 2 – must be grown within a demarcated area under permit; and
- Category 3 - ornamental plants that may no longer be planted, but existing plants may remain provided that all reasonable steps are taken to prevent the spreading thereof, except within the flood lines of water courses and wetlands.

The abundance of alien plant species on the Hotazel Solar site is very low, which can be ascribed firstly to the aridity of the site.

In terms of soil and water resources, the seasonal washes and several pans highlighted as sensitive and have been excluded from the development footprint. In order to comply with the requirements of the CARA, the holder of the EA must adopt and implement the Alien Vegetation Management Plan attached in **Appendix F**.

3.8 NATIONAL HERITAGE RESOURCES ACT (NHRA) (ACT 25 OF 1999)

The protection and management of South Africa's heritage resources are controlled by the National Heritage Resources Act (Act No. 25 of 1999). South African National Heritage Resources Agency (SAHRA) is the enforcing authority in the Northern Cape, and is registered as a Stakeholder for this environmental process.

In terms of Section 38 of the National Heritage Resources Act, SAHRA will comment on the detailed Heritage Impact Assessment (HIA) where certain categories of development are proposed. Section 38(8) also makes provision for the assessment of heritage impacts as part of an EIA process.

The National Heritage Resources Act requires relevant authorities to be notified regarding this proposed development, as the following activities are relevant:

- *the construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;*
- *any development or other activity which will change the character of a site exceeding 5 000 m² in extent;*
- *the re-zoning of a site exceeding 10 000m² in extent.*

Furthermore, in terms of Section 34(1), no person may alter or demolish any structure or part of a structure, which is older than 60 years without a permit issued by the SAHRA, or the responsible resources authority.

Nor may anyone destroy, damage, alter, exhume or remove from its original position, or otherwise disturb, any grave or burial ground older than 60 years, which is situated outside a formal cemetery

administered by a local authority, without a permit issued by the SAHRA, or a provincial heritage authority, in terms of Section 36 (3).

In terms of Section 35 (4), no person may destroy, damage, excavate, alter or remove from its original position, or collect, any archaeological material or object, without a permit issued by the SAHRA, or the responsible resources authority.

The contractor will have to ensure compliance with the SAHRA approval, once authorised.

3.9 NATIONAL WATER ACT (NWA), NO 36 OF 1998

Water use in South Africa is controlled by the NWA and the enforcing authority is the DWS. The NWA recognises that water is a scarce and unevenly distributed national resource in South Africa. Its provisions are aimed at achieving sustainable and equitable use of water to the benefit of all users and to ensure protection of the aquatic ecosystems associated with South Africa's water resources. The provisions of the Act are aimed at discouraging pollution and waste of water resources.

In terms of the Act, a land user, occupier or owner of land whereon which an activity that causes, or has the potential to cause pollution of a water resource, has a duty to take measures to prevent pollution from occurring. If these measures are not taken, the responsible authority may do whatever is necessary to prevent the pollution or remedy its effects, and to recover all reasonable costs from the responsible person.

Section 21 of the NWA specifies a number of water uses, including taking water from a water resource, the storing of water, impeding or diverting the flow of water in a watercourse, discharging waste or water containing waste into a water resource through a pipe, canal, sewer, sea outfall or other conduit, disposing of waste in a manner which may detrimentally impact on a water resource, disposing in any manner of water which contains waste from, or which has been heated in, any industrial or power generation process, discharging water from underground for the safety of people, and altering the bed, banks, course or characteristics of a watercourse. These Water uses requires licencing in terms of Section 22 (1) of the Act, unless it is listed in Schedule 1 of the NWA, is an existing lawful use, the water use falls under a General Authorisation issued under Section 39 of the Act, or if the responsible authority waives the need for a licence.

3.10 ASTRONOMY GEOGRAPHIC ADVANTAGE ACT, 2007 (ACT NO 21 OF 2007)

The purpose of the Act is to preserve the geographic advantage areas that attract investment in astronomy. The entire Northern Cape Province, excluding the Tsantsabane Municipality, has been declared an astronomy advantage area. The Northern Cape optical and radio telescope sites were declared core astronomy advantage areas. The Act allowed for the declaration of the Southern Africa Large Telescope (SALT), Meerkat and Square Kilometre Array (SKA) as astronomy and related scientific endeavours that has to be protected.

3.11 GUIDELINES & STRATEGIC DOCUMENTS

The following guidelines and strategic documents were considered during the compilation of this EMPr.

3.11.1 National Waste Management Strategy

The National Waste Management Strategy presents the South African government's strategy for integrated waste management for South Africa. It deals among others with: Integrated Waste Management Planning, Waste Information Systems, Waste Minimisation, Recycling, Waste Collection and Transportation, Waste Treatment, Waste Disposal and Implementing Instruments.

3.11.2 Waste Minimisation Guideline Document for Environmental Impact Assessment Review (May 2003)

This guideline, although compiled on a provincial level, was considered pertinent to this EMPr. This Guideline raises awareness to waste minimisation issues and highlights waste and wastage minimization practices. Part B of this document is of particular importance, as it addresses issues of general waste and wastage minimization during construction activities.

3.11.3 National Building Regulations

The National Building Regulations and Building Standards Act as amended must be complied with. This act addresses, inter alia:

- Specifications for draftsmen, plans, documents and diagrams;
- Approval by local authorities;
- Appeal procedures;
- Prohibition or conditions with regard to erection of buildings in certain conditions;
- Demolition of buildings;
- Access to building control officers;
- Regulations and directives; and
- Liability.

3.11.4 Other Guidelines considered

In addition to those described above, the following guidelines were also considered during the compilation of this EMPr.

- DEADP (2003). Waste Minimisation Guideline for Environmental Impact Assessment reviews. NEMA EIA Regulations Guideline & Information Series, Department Environmental Affairs & Development Planning.
- DEAT (2004). Environmental Management Plans, Integrated Environmental management, Information Series 12, Department Environmental Affairs & Tourism
- DEADP (2010). Guideline for Environmental Management Plans. NEMA EIA Regulations Guideline & Information Document Series, Department of Environmental Affairs & Development Planning.

4. DESIGN & PRE CONSTRUCTION PHASE

The following management considerations are to be adopted and implemented during the design and pre-construction phase.

4.1 PRE CONSTRUCTION ECOLOGICAL REQUIREMENTS

The ecological specialist, Simon Todd (2012 & 2013), recommended that the sensitive areas with appropriate buffers at the site should be demarcated by an ecologist as part of the preconstruction activities for the site. In addition, contracted ecologist should undertake a preconstruction survey of the final development footprint to ascertain the identity and exact number of individuals of protected species affected by the development (This has already been undertaken). A single integrated permit, which covers nationally or provincially listed plant species permitting requirements, as well as meets TOPS regulations, must be obtained from the Department of Environmental Affairs & Nature Conservation (DEANC) permit office in Kimberly prior to the any plant rescue / transplant and/or removal activities. An ecological expert has undertaken a detailed site walk through in support of an application for the removal of threatened plants in terms of this legislation. Any conditions of this licence, once issued, must be complied with by the contractor and the holder of the EA.

An Environmental Control Officer (ECO) should be present for the site preparation and initial clearing activities to ensure the correct demarcation of no-go areas, facilitate environmental induction with construction staff and supervise any flora relocation and faunal rescue activities that may need to take place during the site clearing.

4.2 PRE CONSTRUCTION HERITAGE REQUIREMENTS

The protection of the archaeological features on site and the demarcation thereof must be undertaken as defined by the Archaeology Specialist.

4.3 PRE-CONSTRUCTION ENVIRONMENTAL COMPLIANCE WORKSHOP

OUTCOME: To ensure that all contract senior staff members have knowledge of the environmental requirements for the site in terms of the EA and EMP.

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. The purpose of this workshop is to ensure that all relevant personnel are familiar with the provisions of the EMP, as well as the conditions of the Environmental Authorisation.

The following people must be present at this Environmental Compliance Workshop:

- The ECO;
- The Main Civil Contractor (including contract manager, site agent and foreman);
- The Electrical Contractor (including contract manager, site agent and foreman);
- The Consulting Engineers (electrical, civil and structural, whichever applicable); and
- Project Management.

Provision should be made in contract and tender documentation to attend a 6 hour workshop that will be chaired by the ECO.

4.4 ENVIRONMENTAL INDUCTION TRAINING & ENVIRONMENTAL EDUCATION

OUTCOME: To ensure that all staff members have knowledge of the environmental requirements for the site in terms of the EA and EMP.

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

There are a number of listed and **protected species** present at the site and it is confirmed that some of these would be impacted by the development. Further plant species may well be identified by the ecological specialist to occur within the proposed development area during the pre-construction survey. It is important that the ECO and all construction staff be made aware of these species and how to identify them, so that they can be suitably avoided and/or protected where possible (see Section 16 of the EMPr for photographs and description of important plant species). Section 17 provides details of the alien plant species, that will need to be removed from site on a systematic basis. It is the ECO's responsibility to print enlarged posters of these photographs and descriptions for use in the Environmental Induction / Education training sessions. It is also the ECO's responsibility to ensure that the required permit be obtained from the Kimberly DEANC office prior for the transplant and/or removal of protected plant species, as well as to provide instruction on and guide all plant rescue, transplant and rehabilitation activities (i.e. plants must be carefully removed and transplanted outside the development area as directed by the ecological specialist and/or the ECO).

As further plant species of conservation value, as well as archaeological occurrences, are likely to occur in proximity of the major **drainage lines and pans** nearby, these must be **demarcated as NO-GO** areas and must be avoided by all staff.

As a minimum, induction training should include:

- Explanation of the importance of complying with the EMPr;
- Explanation of the importance of complying with the Environmental Authorisation;
- Discussion of the potential environmental impacts of construction activities;
- The benefits of improved personal performance;
- Employees' roles and responsibilities, including emergency preparedness (this should be combined with this induction, but presented by the contractors Health and Safety Representative);
- Explanation of the mitigation measures that must be implemented when carrying out their activities;
- Explanation of the specifics of this EMPr and its specification (no-go areas, etc.); and
- Explanation of the management structure of individuals responsible for matters pertaining to the EMPr.

Furthermore, the induction training must ensure that construction workers/staff understand that **no form of wildlife poaching, collecting (plant or animal) or other form of disturbance will be permitted** on the construction site or the adjacent areas.

Should the staff turnover be high and with additional appointment of sub-contractors, it may be necessary to conduct additional induction training sessions, as well as regular environmental education debriefings. This is at the discretion of the ECO.

The contractor 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 environmental control reports.

4.5 DEMARCATION OF NO-GO AREAS

OUTCOME: To ensure the protection of sensitive features outside of the development footprint.

The demarcation of no-go areas is of extreme importance to ensure that disturbance is restricted to the future developed area and that areas outside this demarcated area are protected and not damaged unnecessarily.

The proposed actions for demarcation are as follows:

- 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.
- All sensitive hydrological features as identified by specialists must be demarcated for exclusion.
- The contractor, in conjunction with the ECO, must walk the areas determined and mark the full extent of the area to be disturbed (allowing sufficient space for the construction activity);
- All areas beyond these demarcated areas are considered as “no-go” areas (i.e. the drainage line and pans); and
- Construction staff must be briefed as part of the environmental induction on the requirements regarding the no-go areas.

4.6 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 contractor must consider the following requirements regarding phasing, when developing the construction programme. This construction programme must be approved by the engineer’s representative with input from the ECO.

- The 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.
- Sites that will be temporarily disturbed by the construction activities (e.g. material loading, temporary storage, turning circles, etc.) must also be included in the road access network.

4.7 ESTABLISHMENT OF CONTRACTORS SITE CAMP

OUTCOME: To ensure that the activities that typically take place in a contractors site camp are restricted to predefined area that does not contain or is in close vicinity of any sensitive features..

The Contractors Site Camp must be established in consultation with the ECO. The site camp may not be erected on any areas considered sensitive as defined by the participating specialists. The following actions are applicable:

- The Contractors Site Camp must be situated within the development area. Site Camps that are allowed off-site may only be erected once written permission from the landowner is obtained and any other necessary authorisations are in place;
- Topsoil from the site camp area must be stripped and stockpiled for re-use during rehabilitation. This must be done to ensure no contamination of the topsoil while the site camp is in use;
- The site camp must be fenced off with shade netting;
- All construction material must be stored in the site camp, unless otherwise approved by the ECO. This may excludes PV panel mounting structures and panel components which will be stored at each of the assembly point, as per the manufacturer plans;
- No personnel may overnight in the site camp, except in the case of a night watchman / security;

- Fires for cooking and/or heating are only allowed within the site camp after consultation with the Health and Safety Representative;
- Fuel may only be stored in the camp site;
- Storage of waste must take place within the site camp and must be removed on a regular basis; and
- 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.

4.8 WATER CONSERVATION IN INFRASTRUCTURE

OUTCOME: To ensure sustainable resource use

The following actions must be considered in the design and construction of the associated structures / infrastructure (on-site substation, auxiliary buildings etc.) to be constructed as part of the PV solar development:

4.8.1 Ablution / Sanitation Facilities

The on-site substation, control and workshop buildings should be fitted with rainwater collection and storage systems to supply water to the all taps and toilets in these buildings, as well as any outdoor requirements (landscaping, washing etc.).

All toilets should be fitted with dual flush systems. 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).

All taps to be installed in the control / substation / workshop buildings must be fitted with low-flow faucets. 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.

4.9 ENVIRONMENTAL CONTROL OFFICER

OUTCOME: Independent monitoring and reporting on compliance with EA and EMPr.

An Environmental Control Officer (ECO) must be appointed for this project (This appointment must take place during the pre-construction phase before the commencement of any of the authorised activities, including site preparation).

The ECO will be responsible for monitoring, reviewing and verifying compliance by the EPC Contractor with the environmental specifications of this EMP and the conditions of the Environmental Authorisation.

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. The holder of the EA must provide the name and contact details of the ECO to the Director: Compliance and Monitoring at DEA.

The responsibilities of the ECO include but are not limited to the following:

- Provide environmental induction training to contractors on site prior to commencing of construction activities;
- Be fully knowledgeable of all the licences and permits issued to the site.
- Review, maintenance and update of the EMPr;

- Liaison between the Project Proponent, Contractors, Authorities and other lead stakeholders on all environmental concerns, including the implementation of the EMPr;
- Compilation of 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;
- Compilation of the Environmental Audit Report or Environmental Completion Statement, six months after completion of construction. Reports should be submitted to the National and Provincial environmental authority as well as the holder of the EA and EPC contractor;
- Monitor compliance with this EMPr;
- Monitor compliance with the Environmental Authorisation;
- Monitor implementation of the mitigation and rehabilitation measures and recommendations referred to in the Environmental Authorisation, Final Environmental Impact Report, participating specialists and this EMPr.
- Recommend the issuing site instructions to the Contractor for corrective actions required (formal site instructions are to be issued by the Engineers Representative with input from the ECO);
- The ECO should be on site for the duration of site establishment and preparation.
- ECO site inspections should then be undertaken 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 Engineers Representative. The Environmental Site Agent as described below should be on site daily and be in communication with the ECO on a daily basis.
- Attendance of contractors site meetings;
- 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 ECR;
- Maintain a public complaints register in which all complaints and action taken / responses must be recorded. This information must also be included in the ECR;
- Keep Record of all activities on site, problems identified, transgressions noted and a task schedule of tasks undertaken by the ECO; and
- Engineers Representative 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.

4.9.1 Environmental Site Agent (ESA)

OUTCOME: To ensure independent full time environmental expertise on site to monitor and report on compliance

An environmental site agent should be appointed for the duration of the construction period of the solar project (This ESA must be appointed in the pre-construction phase, prior to the commencement of construction activities). The Terms of Reference for the Environmental Site Agent (ESA) include, but are not limited to the following actions:

- To ensure compliance with the Environmental Management Plan and Environmental Authorisation;
- The ESA is required to be on site daily, which may be reviewed by the ECO and resident engineer as construction requirements dictate;
- Assisting the contractor with environmental induction of the contractors;
- Attending all on site construction meetings (including, but not limited to, technical and contractors meetings);
- Providing the ECO with a weekly compliance report in a format defined by the ECO;
- Developing and maintaining a detailed photographic site record throughout the construction phase of the project;

- Maintaining a register of all site instructions;
- Maintaining file records of all method statements provided by the contractors;
- Management and ensuring contractor implementation with the environmental rehabilitation plan (still to be developed);
- Revision and updating the EMP in conjunction with the ECO, if and when required;
- 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;
- Maintain a public complaints register in which all complaints and action taken / responses must be recorded. This information must also be included in the ECR;
- In the event that the ESA observes non-compliance that requires a “stop work” order, the ECO must immediately be informed and will request the Engineers Representative to issue such an order if necessary.

4.9.2 ECO and ESA competency

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, preferably with experience on similar scale Developments.

The ESA must have a minimum of a tertiary level qualification, as well as at least 2 years' experience and proven competency as an ESA.

4.10 PLANT RESCUE AND PROTECTION

OUTCOME: To reduce the impact on protected and sensitive botanical features.

A Plant Rescue and Protection Plan is attached in Appendix D. The following pre-construction requirements are relevant to this plan.

- Identification of all listed species which may occur within the site, based on the SANBI SIBIS database as well as the specialist EIA studies for the site and any other relevant literature (This has already taken place by Ecological expert, Mr Simon Todd)
- A walk-through of the final development footprint by a suitably qualified botanist/ecologist to locate and identify all listed and protected species which fall within the development footprint. (This has already taken place by Ecological expert, Mr Simon Todd)
- A walk-through report following the walk-through which identifies areas where minor deviations to roads and other infrastructure can be made to avoid sensitive areas and important populations of listed species. The report should also contain a full list of localities where listed species occur within the development footprint and the number of affected individuals in each instance, so that this information can be used to comply with the permit conditions required by the authorization as well as provincial requirements. (This has already taken place by Ecological expert, Mr Simon Todd)
- Search and rescue operation of all listed species within the development footprint that cannot be avoided. Affected individuals should be translocated to a similar habitat outside of the development footprint and marked for monitoring purposes. Those species suitable for search as rescue have been identified in the walk-through report. It is important to note that a permit is required to translocate or destroy any listed and protected species even if they do not leave the property. Some plants can also be offered to national collections such as the National Botanical Gardens, but no plants should be allowed to go to private collectors unless this is approved by the provincial conservation authorities.

5. CONSTRUCTION PHASE ENVIRONMENTAL MANAGEMENT

The items contained in this section of the EMPr must be implemented during the construction phase of the development of the Hotazel Solar Development.

5.1 WATER SUPPLY

OUTCOME: To ensure water used during construction is lawfully and sustainably utilised.

The contractor must ensure a supply of water is available on site for sanitation, drinking, dust suppression etc.

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.25⁰C, pH: between 5.5 & 7.5 and conductivity: not be increased more than 15% above the intake water & not exceed 250 milli-Siemens per metre (determined at 25⁰C). The water used for dust suppression is likely to be borehole water / municipal water, and not treated effluent. This item is specific to water supply during the construction phase. Water supply for the washing of panels is discussed under the operational phase requirements.

5.2 TOPSOIL HANDLING

OUTCOME: To ensure that the handling of topsoil does not result in the pollution or loss of the resource..

This section must be read in conjunction with the Re-vegetation and Restoration Plan in appendix E.

In terms of best practice and for rehabilitation purposes, it is essential that a 150mm layer of topsoil from the building and road footprints (i.e. the on-site substation, auxiliary buildings and contractor's site camp) 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 panels.

Topsoil is of utmost importance for use in rehabilitation of disturbed areas and should therefore under no circumstances be mixed with sub-soils. Since the panels are to be installed using low impact pile installation, topsoil from underneath the panel arrays must be left in situ.

The following actions regarding topsoil handling must be considered:

- A minimum 150mm layer of topsoil from the access and internal roads, on-site substation, auxiliary buildings and contractors site camp;
- The topsoil stockpile site must be approved by the ECO and may not be within the sensitive areas as defined by the participating specialists;
- The topsoil may not be stockpiled within any of the remaining natural areas. A existing disturbed area should rather be chosen for this purpose;
- The topsoil stockpile must be protected from erosion and dust as indicated by the ECO and this EMPr; and
- The topsoil must be replaced into disturbed areas (road verges, cable trenches and contractors site camp) on completion of construction.

5.3 TRANSPORT & TRAFFIC MANAGEMENT

The Transport Study and Traffic Management plan is attached in **Appendix C** and forms an integral part of this EMPr.

5.4 CONCRETE MANAGEMENT

OUTCOME: To ensure that the handling of concrete does not result in pollution of soil or water resources.

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 practically possible and for other concrete work associated with the substation and inverter stations, the following requirements 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. Mass batching of concrete on site should be limited as far as possible.

The following actions must be implemented regarding the delivery of concrete to site:

- Trucks should deliver pre-mixed concrete to the site and pour the concrete directly into the prepared excavations.
- 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; and
- Any spillages of concrete outside of the excavations (including haulage routes) must be cleaned up immediately by the supplier.

Where small batching of concrete or plaster takes place on site, the following actions must be implemented:

- Concrete batching may only take place in areas approved by the ECO (preferably in the Site Camp);
- Concrete mixing areas must have bund walls or a settling pond in order to prevent cement run off;
- 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);
- In order to avoid resource contamination, concrete batching should not be located within 60m of a drainage line / watercourse, within a watercourse flood plain or where there is a potential for any spilled concrete to enter a watercourse or groundwater (boreholes).
- 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.
- Batching at satellite sites must be done on a batching plate i.e. wood or metal sheet, to prevent soil contamination.

5.5 CABLE TRENCHES

OUTCOME: To ensure that trenching activities are restricted and do not result in loss of topsoil resources.

Electric cables required to connect the inverters to the on-site substation (i.e. AC cables) within the boundaries of the Hotazel Solar Development area will be installed underground, **within or parallel to the internal road network and/or paths between the panel rows**, as far as possible. Please refer to the SDP included in **Appendix A** showing all AC cabling running parallel to the

internal roads. There will also be limited trenching associated with the DC cabling (although the majority of this will be aboveground – mounted to the panel arrays.)

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. 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. In this regard, cable trenches, as with the internal road network, should follow the contours of the land as far as possible.

The following actions must be implemented by the contractor:

- 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);
- The planning and selection should be done in approximation to the SDP and cognisance shall be given to minimising the potential for soil erosion;
- Trench routes with permitted working areas shall be clearly defined and marked with prior to excavation;
- The stripping and separation of topsoil and subsoil shall occur as stipulated by the ER. Soil shall be stockpiled for use as backfilling as directed by the ER with input from the ECO;
- Trench lengths shall be kept as short as practically possible before backfilling and compacting;
- 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 approved by the ER with input from the ECO;
- Stockpiled topsoil must be replaced at the top of excavated trenches; and
- The ER with input from the ECO may require the planting of additional vegetation along trench routes in order to speed up rehabilitation (particularly in areas that may be prone to erosion).
- Open trenches must be inspected daily for faunal entrapment (small mammals and reptiles). These are to be removed before backfilling of the trenches.

5.6 MANAGEMENT OF ARCHAEOLOGICAL RESOURCES

OUTCOME: To ensure that works do not result in significant loss of archaeological resources.

Should any archaeological and/or paleontological remains, including (but not limited to) fossil bones, fossil shells, coins, indigenous ceramics, colonial ceramics, marine shell heaps, stone artefacts, bone remains, rock art, rock engravings and any antiquity be discovered during construction, the ECO should safeguard these (preferably *in situ*) and report the find immediately to the South African Heritage Resources Council (SAHRA) and the Northern Cape Heritage Resources Authority (NCHRA), so that they are not disturbed further until the necessary guidance and approval have been obtained and the appropriate action (e.g. recording, sampling or collection) can be taken by a professional archaeologist or palaeontologist.

5.7 NOISE MANAGEMENT

OUTCOME: To ensure nuisance from noise and vibration does not occur.

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

- It is recommended that noise generation be kept to a minimum and that construction activities be confined to normal working hours (08:00 - 17:00 on workdays). Should the Contractor / Engineer wish to deviate from these work hours, this must be discussed during the Pre-Construction / Initial Environmental Compliance Workshop with the ECO and recorded in the necessary Method Statements;
- Provide baffle and noise screens on noisy machines as necessary;

- Provide absorptive linings to the interior of engine compartments;
- Ensure machinery is properly maintained (fasten loose panels, replace defective silencers);
- Switch off machinery immediately when not in use; and
- Reduce impact noise by careful handling.

The Contractor shall 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).

5.8 DUST CONTROL & MANAGEMENT

OUTCOME: To ensure there is no health risk or loss of amenity due to emission of dust to the environment.

Every effort to minimize dust pollution on the site must be undertaken. The contractor must implement the following measures with regards to the management of dust on site:

The most important dust control measure is achieved by maintaining as much of the vegetative cover as possible (the method of securing panels with minimal excavations supports this measure). The following actions are suggested in this regard:.

- Construction vehicles must adhere to speed limits and minimization of haul roads must be implemented;
- During dry, dusty periods haul roads should be kept dampened to prevent excess dust. No potable water may be used for damping haul roads;
- All vehicles used to deliver or remove loose material (sand, soil, gravel etc.) to and from site must be covered with a 60% shade cloth to avoid dust blowing from the vehicle.
- As an alternative, products such as Road Environment Dust Suppressants (REDS) would be recommended in order to minimize the use of water to control dust pollution. This is to be determined by the ECO during construction as required; and
- Exposed stockpile materials must be adequately protected against wind (covered), and should be sited in consideration of the prevailing wind conditions.

Apart from those actions detailed above, the following additional measures must be implemented:

- Dust nuisances shall comply with the applicable standards according to the Occupational Health and Safety (Act No. 85 of 1993). The contractor shall be solely responsible for the control of dust arising from the contractor's operations and for any costs against the Employer for damages resulting from dust;
- The contractor shall take all reasonable measures to minimise the generation of dust as a result of construction activities to the satisfaction of the Engineer's Representative (ER);
- Removal of vegetation shall be avoided until such time as soil stripping is required and similarly exposed surfaces shall be re-vegetated or stabilised as soon as is practically possible;
- Excavation, handling and transport of erodible materials shall be avoided under high wind conditions or when a visible dust plume is present;
- During high wind conditions the site manager, with input from the ECO, must evaluate the situation and make recommendations as to whether dust damping measures are adequate, or whether work should cease altogether until the wind speed drops to an acceptable level.
- Where possible, soil stockpiles shall be located in sheltered areas where they are not exposed to the erosive effects of the wind. Where erosion of stockpiles becomes a problem, erosion control measures shall be implemented at the discretion of the site manager.
- Vehicle speeds shall not exceed 40km/h along dust roads or 20km/h when traversing unconsolidated and non-vegetated areas.

- Appropriate dust suppression measures shall be used when dust generation is unavoidable, e.g. dampening with water or use of REDS, particularly during prolonged periods of dry weather in summer. Such measures shall also include the use of temporary stabilising measures (e.g. chemical soil binders, straw, brush packs, clipping etc.).
- Straw stabilisation shall be applied at a rate of one bale per 10m² and harrowed into the top 100mm of top material for all completed earthworks (i.e. all those areas that are not hard surfaced as part of the Solar Facility). This is only relevant to areas disturbed through the construction activities (such as cable trenches) and not areas where vegetation remains intact.
- Should water be used for dust suppression on gravel roads, it must be of a quality compliant with the General Special Effluent Standards (31/03/2009): Temperature: max.25⁰C, pH: between 5.5 & 7.5 and conductivity: not be increased more than 15% above the intake water & not exceed 250 milli-Siemens per metre (determined at 25⁰C). The water used for dust suppression must be sourced from a licenced resource.

5.9 SECURITY FENCING

OUTCOME: To ensure that fencing protects project assets while limiting impact on faunal passages.

During construction it may 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). These temporary fencing will be restricted to these areas and be removed at the end of the construction phase. The completed solar facility will be fenced with a permanent perimeter electrified fence in order to prevent theft of infrastructure during operation. Recommendations made by the ecologist applicable to the erection of this permanent fence are as follows:

- The fencing should be constructed in manner which allows for the passage of small and medium sized mammals, at least at strategic places, such as along drainage lines or other areas of dense vegetation. Steel palisade fencing (20cm gaps minimum) is a good option in this regard as it allows most medium-sized mammals to pass between the bars, but remains an effective obstacle for humans. Alternatively, the lowest strand or bottom of the fence should be elevated to 15 cm above the ground at least at strategic places to allow for fauna to pass under the fence.
- Electrified strands should not be within 20cm of the ground, because tortoises retreat into their shells when electrocuted and eventually succumb from repeated shocks.
- Only the facility itself should be fenced-off.
- Any security lighting associated with the fencing should be kept to a minimum and be of the low-UV emitting kind that attracts fewer insects.
- The final fencing plan should be submitted to the ECO for comments and approval.

5.10 BLASTING

OUTCOME: To ensure any unlikely blasting activities do not disturb sensitive environmental nor social features

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

- 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 (this scenario is however highly unlikely, as blasting will probably not take place);

- A current and valid authorisation shall be obtained from the relevant authorities and copied to the ER prior to any blasting activity;
- A method statement shall be required for any blasting related activities;
- All laws and regulations applicable to blasting activities shall be adhered to at all times;
- A qualified and registered blaster shall supervise all blasting and rock splitting operations at all times;
- 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);
- The contractor shall allow for good quality vibration monitoring equipment and record keeping on site at all times during blasting operations;
- The contractor shall ensure that emergency services are notified, in writing, a minimum of 24 hours prior to any blasting activities commencing on site;
- The contractor shall take necessary precautions to prevent damage to special 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 ER and the ECO;
- The contractor shall ensure that adequate warning is provided immediately prior to all blasting. All signals shall also be clearly given;
- The contractor shall use blast mats for cover material during blasting. Topsoil may not be used as blast cover;
- During demolition, the contractor shall ensure, where possible, that trees in the area are not damaged;
- Appropriate blast shaping techniques shall be employed to aid in the landscaping of blast areas, and a method statement to be approved by the ER, shall be required in this regard; and
- **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.

5.11 RAMMING OPERATIONS

OUTCOME: To ensure that panel mounting operations do not cause pollution or undue mechanical damage to the environment

It is envisioned that ramming will be the preferred method of installing the panel support structures. The following actions must be implemented in this regard. Please refer to the engineering report in Annexure D4 of the Draft EIR for further detail in this regard.

- 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 ER (with input from the ECO) prior to the onset of any ramming operations;
- The contractor shall take all reasonable measures to limit dust generation as a result of ramming operations (also see Section 5.9 addressing management of dust);
- Noise and dust nuisances shall comply with the applicable standards according to the Occupational Health and Safety (Act No. 85 of 1993);
- Any areas or structures damaged by the ramming and associated activities shall be rehabilitated by the contractor to the satisfaction of the ER with input from the ECO.

5.12 STORMWATER, WASHWATER AND EROSION MANAGEMENT

OUTCOME: To ensure that stormwater and washwater do not cause erosion or pollution of the receiving environment.

The Stormwater, Erosion and Washwater Management Plan (Attached in **Appendix B**) forms an integral part of this EMP and must be adopted and implemented by the holder of the EA. The following key actions are required:

- To limit soil erosion, construction activities (more specifically clearing of land) should be limited to the dry season (May to October) as far as possible.
- Construction activities should be limited to areas outside of the 1:100 year floodline
- Upstream and downstream berms, for each construction site, should be implemented during the pre-construction and construction phases of the project. Upstream diversions will ensure limited surface flows through construction areas. Downstream berms will ensure that sediments eroded from within the construction site will be trapped, therefore reducing the impact to the downstream receiving environment. It is recommended that the berms are constructed out of a non-erodible material, such as sand bags with plastic liners.
- Materials excavated during the construction phase should be deposited in areas outside of drainage lines and stormwater channels. This will ensure minimal contact between concentrated stormwater runoff and the excavated materials.
- Machinery used during the construction process should be regularly (at least daily) checked for oil leaks. During periods where the machinery is not in use, drip trays should be placed under the machinery to contain any spillages.
- Fuels and hydrocarbon stores used during the construction phase should be lined and bunded such that spills from the store areas will not enter the receiving environment.
- Clearing of vegetation for construction purposes must be undertaken in accordance with a method statement. The method statement must include the method of clearing, recovery of and disposal of vegetation.

5.13 FIRE MANAGEMENT AND PROTECTION

OUTCOME: To reduce the risk of fire to infrastructure and environment.

As mentioned above in Section 3.6 above, it is the landowner's responsibility to develop and maintain firebreaks as well as be sufficiently prepared to combat veld fires.

The solar 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 very 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. Alternative management practices can include brush-cutting. Utilisation of non-selective herbicides for the management of biomass is prohibited on site.

The following actions must however be considered with regards to fire protection on site:

- Fires should **only be allowed within fire-safe demarcated areas** (preferably within the site camp);
- **No fuelwood collection** should be allowed on-site;
- The **total removal of all invasive alien vegetation** should take place in order 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 attached in **Appendix F**;

- Cigarette butts may not be thrown in the veld, but must be disposed of correctly. The contractor, with input from the ECO, must **designate smoking areas** (in compliance with the Tobacco Products Control Amendment Act 63 of 2008) with suitable receptacles for disposal;
- In case of an emergency, the **contact details of the local fire and emergency services** must be readily available;
- Contractors must ensure that **basic fire fighting equipment and suitably qualified/experienced personal** are available on site at all times, as per the specifications defined by the health and safety representative / consultant;
- The fire risk on site is a point of discussion that must take place as part of the pre-construction compliance workshop and the environmental induction training prior to commencement of construction; and
- The contractor must also comply with the requirements of the Occupational Health and Safety Act with regards to fire protection.

5.14 SANITATION DURING CONSTRUCTION

OUTCOME: To ensure safe and healthy sanitation for construction staff without increasing pollution risk

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:

- Toilet and washing facilities must be available to the site personnel at all times;
- These facilities must be situated within the site camp and away from any washes or drainage lines;
- One toilet for every 15 personnel is required;
- The facilities must be serviced on a regular basis to prevent any overflow or spillage;
- The servicing contractor must dispose of the waste in an approved manner (e.g. via the municipal waste water treatment system);
- The ECO must be provided with the service providers' details and the service schedule for the site;
- The toilets should be secured to ensure that they do not blow over in windy conditions;
- All toilet facilities must be removed from site on completion of the contract period, and;
- Should the construction period be interrupted by a builders break, the toilets should be emptied prior to the break.

Sanitation during operation is discussed above under the design criteria in Section 4.7.

5.15 FUEL STORAGE

OUTCOME: To ensure lawful fuel storage that does not cause soil and water pollution.

The above ground storage of fuel is subject to authorization in terms of the National Environmental Management Act (NEMA EIA regulations) if more than 30m³ is stored on site at any one time.

Should a temporary storage of hazardous or toxic materials / liquids (chemicals, fuels, lubricants and oils) be required, the Contractor must ensure that he/she complies with legislation and that the following actions are in place:

- Temporary fuel storage must take place within the contractors site camp in an area approved by the ECO;
- No storage of fuel may take place on any other portion of the site;

- 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.
- Mobile fuel units used to refuel plant on site must make use of drip trays when refuelling;
- Storage facilities may not be located within 60m of a the on-site drainage lines or where there is a potential for any spilled fuel to enter a watercourse or groundwater;
- Fuel storage facilities should be located on flat ground. No cut and fill should take place immediately on or adjacent to fuel storage areas;
- All storage tanks should be double lined and be ISO 9001 certified;
- All storage tanks must be enclosed by bund walls;
- Bund walls must be constructed to contain at least 110% of the total capacity of the storage tanks;
- Bund walls must be constructed of impermeable material or lined to ensure that petroleum products cannot escape;
- A suitable material should be placed in the base of the bund walls to soak up any accidental spillages;
- The tanks should be locked and secured when not in use;
- Automatic shut-off nozzles are required on all dispensing units;
- 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 builders shutdown, the contractor must ensure that storage tanks are emptied prior to this period;
- 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;
- Defective hoses, valves and containment structures should be promptly repaired;
- 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, and;
- 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.
- Spill kits must be made available on-site for the clean-up of spills.

5.16 CONSTRUCTION WASTE MANAGEMENT

OUTCOME: To ensure the management of waste is both lawful and sustainable.

5.16.1 Litter management

Wind and scavenger proof bins must be installed at the Contractor Site Camp and must be emptied on a weekly basis.

5.16.2 Construction Rubble and Waste

All construction rubble must be disposed of at an approved site established and registered for this purpose (no construction rubble may be spoiled anywhere on site). NO construction rubble may be used as fill in landscaping or any other areas on site.

5.16.3 Scrap Metal

Recycling of scrap metal is recommended. Scrap metal must be disposed of off-site at suitable facilities (e.g. municipal dump registered for this purpose).

5.16.4 Hazardous Waste

All hazardous waste (including chemicals, bitumen, fuel, lubricants, oils, paints etc.) shall be disposed of at an approved / registered hazardous-waste landfill site. The Contractor shall provide disposal certificates to the ECO.

Used oil and grease must be removed from site to an approved used oil recycling company.

Under NO circumstances may any hazardous waste be spoiled on the site.

Where possible, the maintenance of construction and delivery vehicles should take place off-site.

5.17 THEFT AND OTHER CRIME

OUTCOME: To ensure that activities on site do not increase the criminal activity of the area.

An increase in crime during the construction phase is often a concern. In the case of the Hotazel Solar Development, this is likely to be negligible due to the extremely 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 take into account 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 will include CCTV camera surveillance and security guards.

The following actions are relevant in this regard (refer to Section 5.9 above for details of the facility permanent fencing):

- All portable construction equipment and material must be locked away within the Contractor's Site Camp overnight and during holiday periods;
- Fuel storage tanks must be locked when not in use;
- All unassembled / un-installed PV materials must be locked within the fenced Laydown areas overnight and during holiday periods.
- The minimum amount of lighting should be used at night and this should be of the low-UV emitting kind that attracts less insects.

It must be noted 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.

5.18 PLANT RESCUE AND PROTECTION.

OUTCOME: To reduce the impact on protected and sensitive botanical features.

A plant rescue and protection plan is included in Appendix D and forms an integral part of this EMP.

The following environmental management actions applicable to the construction phase have been summarised from this plan.

5.18.1 Identification of species of conservation concern

The ToPS (Threatened and Protected Species) regulations provide for the regulation of activities which may directly or indirectly impact threatened and protected species. Such species are identified under NEMBA as well as by the National Red Data List of Plants. At a provincial level, the Northern Cape Nature Conservation Act (2009) also provides lists of species which are protected within the province. Species listed under the National Red Data List of Plants as well as those protected under the provincial legislation must be specified on permit applications required for site clearing.

An a permit application has been made for these species and any requirements of this permit once issued must be complied with.

5.18.2 Mitigation & avoidance options

Where listed plant species fall within the development footprint and avoidance is not possible, then it may be possible to translocate the affected individuals outside of the development footprint. However, not all species are suitable for translocation as only certain types of plants are able to survive the disturbance. Suitable candidates for translocation include most geophytes and succulents. Although there are exceptions, the majority of woody species do not survive translocation well and it is generally not recommended to try and attempt to translocate such species.

5.18.3 Rescue and protection requirements

The following actions are required for the construction phase phases of the development lifecycle.

- ECO to monitor vegetation clearing at the site. Any deviations from the plans that may be required should first be checked for listed species by the ECO and any listed species present which are able to survive translocation should be translocated to a safe site.
- Any listed species observed within the development footprint that were missed during the preconstruction plant sweeps should be translocated to a safe site.
- Many listed species are also sought after for traditional medicine or by collectors and so the ECO should ensure that all staff attend environmental induction training in which the legal and conservation aspects of harvesting plants from the wild are discussed.
- The ECO should monitor construction activities in sensitive habitats such as near rivers and wetlands carefully to ensure that impacts to these areas are minimized.

5.19 VEGETATION CLEARING

OUTCOME: To ensure that vegetation is minimised and restricted to the development footprint.

The objective of mitigation for any development is to firstly avoid and minimise impacts where possible and where these cannot be completely avoided, to compensate for the negative impacts of the development on vegetation and animal habitats, and to maximise re-vegetation and rehabilitation of disturbed areas. Some loss of vegetation is an inevitable consequence of the construction of the Hotazel Solar Development and vegetation clearing required for the PV panel 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 following actions apply to vegetation clearing activities for the solar facility:

- Vegetation clearing must be kept to a minimum. If possible, the ground grass layer should be left intact and only the larger woody plants cleared or trimmed. All areas to be cleared should be clearly demarcated, prior to the commencement of clearing activities;
- 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;

- 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;
- 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).

5.20 ANIMAL RESCUE & PROTECTION

OUTCOME: To reduce the direct impact on animals affected by the construction activities.

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.

All trenches and open excavations should be inspected on a daily basis (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.

5.21 RE-VEGETATION & HABITAT RESTORATION

OUTCOME: To restore habitat disturbed during construction activities.

A re-vegetation and habitat restoration plan is attached in **Appendix E** and is deemed to form an integral part of this EMPr.

Certain of the overarching principles and actions in this section are also contained in other sections of this EMPr, but have been reiterated here to ensure easy referencing.

5.21.1 Topsoil management

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. The following actions are required for effective topsoil management.

- Topsoil is the top-most layer (0-25cm) 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.
- Topsoil should be retained on site in order to be used for site rehabilitation. The correct handling of the topsoil is a key 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.
- 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.

- 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.
- 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.

5.21.2 Mulching

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.

- During site clearing the standing woody vegetation should not be cleared and burned, removed or mixed with the soil, but should be cleared separately. 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 as this will aid revegetation and recovery when it is reapplied.
- 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;
- No harvesting of vegetation may be done outside the area to be disturbed by construction activities;
- 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.

5.21.3 Seeding

In some areas the natural regeneration of the vegetation may be poor and the application of seed to enhance vegetation recovery may be required. 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.

- Indigenous seeds may be harvested 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;
- Seed may be harvested by hand and if necessary dried or treated appropriately
- Seed gathered by vacuum harvester, or other approved mass collection method, from suitable shrubs or from the plant litter surrounding the shrubs must be kept apart from individually harvested seed;
- No seed of alien or foreign species should be used or brought onto the site.

5.21.4 Transplants

Also refer to the plant rescue and protection plan in **Appendix D** and the section above for further details on plant rescue.

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.

Plants for transplant should only be removed from areas that are going to be cleared.

- Perennial grasses, shrubs, succulents and geophytes are all potentially suitable candidates for transplant.
- Transplants should be placed within a similar environment from where they came in terms of aspect, slope and soil depth.
- Transplants must remain within the site and may not be transported off the site.
- Some species can also grow from cuttings and branches of many succulent species can be rooted in the field.

5.21.5 Use of soil savers

On steep slopes (unlikely on the Hotazel 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 man-made materials, usually constructed of organic material such as hemp or jute and are usually applied in areas where traditional rehabilitation techniques are not likely to succeed.

- In areas where soil saver is used, it should be pegged down to ensure that it captures soil and organic matter flowing over the surface.
- 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.

5.21.6 General recommendations

Progressive rehabilitation is an important element of the rehabilitation strategy and should be implemented where feasible.

- Once re-vegetated, areas should be protected to prevent trampling and erosion.
- No construction equipment, vehicles or unauthorised personnel should be allowed onto areas that have been vegetated.
- Where rehabilitation sites are located within actively grazed areas, they should be fenced.
- Fencing should be removed once a sound vegetative cover has been achieved.
- Any runnels, erosion channels or wash ways developing after revegetation should be backfilled and consolidated and the areas restored to a proper stable condition.

5.21.7 Concluding Statement

- The most cost-effective way to reduce the cost and effort for rehabilitation is to reduce and minimize the disturbance footprint. If the panel arrays can be constructed without clearing the site, then the amount of rehabilitation required would be low and any cleared areas would quickly become re-vegetated.
- The solar 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. As the majority of the site is gently sloping, the risk of erosion is high and retaining vegetation cover between the rows of panels during construction is strongly recommended.

5.22 ALIEN PLANT MANAGEMENT PLAN

OUTCOME: To manage alien species in compliance with the AIS regulations.

An Alien Vegetation management plan is attached Appendix F and is deemed to form an integral part of this EMPR.

The following actions are summarised from this plan

5.22.1 Alien Species Presence & Abundance on the Strausheim Property.

The Hotazel Solar site is currently very lightly invaded by alien species. The density of alien species within the intact vegetation is generally very low and is restricted to disturbed areas around watering points and kraal sites. Species observed at the site include the following species contained in the table below. Of these several are small prostrate species which are not listed and are not considered a high priority. However the declared invaders and large woody species are most important due to their negative effects and have also been observed to increase rapidly at some of the already completed solar PV projects in the area and are therefore also likely to increase following construction of the current development. Species which are likely to require specific attention include *Prosopis glandulosa*, *Argemone ochroleuca*, *Datura ferox* and *Xanthium spinosum*. *Prosopis glandulosa* is not likely to become an immediate problem, but may gradually invade areas within or near the facility which receive additional runoff. The other species are likely to respond more quickly and may become a problem even during construction if there is sufficient rainfall.

5.22.2 Recommended Management Practice & Clearing Methods

The following general principles and observations which underlie or impact the alien management plan can be made regarding the likely trajectories of vegetation change at PV facilities during and following construction:

- There is likely to be a progression of alien species presence and abundance at the PV sites over time. Initially, alien species are likely to be a significant and persistent problem due to the high levels of disturbance present at the sites following construction. Most alien species are poor competitors and the lack of indigenous vegetation cover will encourage the growth of alien species. Provided that alien species are controlled in a sensitive manner, a cover of perennial grasses is likely to become well established with a couple of years. This should discourage alien species which, with additional control, should become considerably less conspicuous within 5 years of construction. Some more competitive alien species may become established at this time and alien control strategies may need to be adapted over time to address the new problem species.
- Alien species presence will vary from year to year in terms of abundance, density and the identity of species present. This can be ascribed largely to variation in rainfall timing and amount, which will favour a different suite of species each year. Therefore, occasional outbreaks of certain species is not likely to be cause for concern, whereas a persistent high or increasing abundance of a species is indicative of a species where control may be required.
- Management practices will impact indigenous as well as alien species. The dominant management practice at the PV facilities is likely to be mowing to control vegetation height and fire risk within the facility. Regular mowing encourages the growth of low and creeping forms and discourages tall growth forms. This principle is well demonstrated by garden lawns or sports fields where most alien species or weeds in the lawn can be eradicated simply through regular mowing.
- Even without management intervention the vegetation composition of the facilities will change over time. This is due to the shading effect of the panels and the uneven distribution of runoff from the panels. So even where PV sites have not been cleared, it is likely that the vegetation beneath the panels will stabilise at a relatively low level on account of the shading effect, while the runoff at the leading edge of the arrays will encourage the presence of taller or more dense vegetation, which is problematic as shading of the panels may occur and a high plant biomass poses a fire risk.

Without being too prescriptive as the exact methods and approaches to be used, the following general management actions should be encouraged or strived for:

- Mowing excess vegetation by hand, for example with a weedeater, generates the lowest level of associated disturbance and is identified as the preferred method for vegetation control. However, this is time consuming and more mechanical means such as using a tractor with mower is also considered acceptable.
- There is a target height to which vegetation should be cut. If the vegetation is cut too low, then recovery of the grass layer will be slow and this may encourage erosion and an increase in alien invasion. On the other hand, if the vegetation is not cut low enough, then recovery will be rapid and frequent follow-up control may be required. It is recommended that the target height for vegetation after mowing should be about 10-15cm.
- The maintenance of fire-breaks around the facilities is an important safety control and the roads around the perimeter of the facility should be maintained free of vegetation. This is best achieved by manual clearing. Within the facilities themselves, some vegetation recovery along the internal roads should be considered acceptable.
- Where dense stands of alien species have established that cannot be controlled by manual means, some use of herbicides may be acceptable. However, the associated safety precautions should be taken with regards to the appropriate application methods as well as the use of personal safety equipment (These are outlined in greater detail below). The best-practice clearing method for each species identified should be used. The preferred clearing methods for most alien species can be obtained from the DWAF Working for Water Website. <http://www.dwaf.gov.za/wfw/Control/>
- The effectiveness of vegetation control varies seasonally and this is also likely to impact alien species. Control early in the wet season will allow species to re-grow and follow-up control is likely to be required. It is tempting to leave control till late in the wet season to avoid follow-up control. However, this may allow alien species to set seed before control and hence will not contribute towards reducing alien species abundance. Therefore, vegetation control should be aimed at the middle of the wet season, with a follow-up event towards the end of the wet season. There are no exact dates that can be specified here as each season is unique and management must therefore respond according to the state and progression of the vegetation.
- Alien management is an iterative process and it may require repeated control efforts to significantly reduce the abundance of a species. This is often due to the presence of large and persistent seed banks. However, repeated control usually results in rapid decline once seed banks become depleted.
- Some alien species such as Opuntia (Prickly Pear) and trees such as Prosopis (Mesquite) are best individually pulled by hand and in the case of Opuntia removed from the site.
- It is expected that regular vegetation control to reduce plant biomass within the PV field will be conducted and that this will be timed so as to coincide with the critical growth phases of the most important alien species. This will significantly reduce the cost of alien management as this should contribute towards the control of the dominant alien species and additional targeted control will be required only for a limited number of species.

5.22.3 General Clearing & Guiding Principles

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

- All clearing actions should be monitored and documented to keep track of which areas are due for follow-up clearing.

5.22.4 Clearing Methods

- Different species require different clearing methods such as manual, chemical or biological methods or a combination of both.
- However care should be taken that the clearing methods used do not encourage further invasion. As such, regardless of the methods used, disturbance to the soil should be kept to a minimum.
- Fire is not a natural phenomenon in the area and fire should not be used for alien control or vegetation management at the site.
- The best-practice clearing method for each species identified should be used. The preferred clearing methods for most alien species can be obtained from the DWAF Working for Water Website. <http://www.dwaf.gov.za/wfw/Control/>

5.22.5 Use of Herbicides for Alien Control

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

- Area contamination must be minimised by careful, accurate application with a minimum amount of herbicide to achieve good control.
- All care must be taken to prevent contamination of any water bodies. This includes due care in storage, application, cleaning equipment and disposal of containers, product and spray mixtures.
- Equipment should be washed where there is no danger of contaminating water sources and washings carefully disposed of in a suitable site.
- To avoid damage to indigenous or other desirable vegetation, products should be selected that will have the least effect on non-target vegetation.
- Coarse droplet nozzles should be fitted to avoid drift onto neighbouring vegetation.
- The appropriate health and safety procedures should also be followed regarding the storage, handling and disposal of herbicides.

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

Working for Water: Policy on the Use of Herbicides for the Control of Alien Vegetation.



Table 5: A dense infestation of Stinkblaar (*Datura ferox*) growing at a South African solar PV plant shortly after construction. A large proportion of this invasion could have been avoided if the vegetation beneath the panels had not been cleared as this vegetation would have utilised the water running off the front of the panels and limited the invasion of the *Datura*.

5.22.6 Construction Phase Activities

The following management actions are aimed at reducing soil disturbance during the construction phase of the development, as well as reducing the likelihood that alien species will be brought onto site or otherwise encouraged.

Table 6: Alien vegetation management requirements during the construction phase.

| Action | Frequency |
|--|-----------|
| The ECO is to provide permission prior to any vegetation being cleared for development. | Daily |
| Clearing of vegetation should be undertaken as the work front progresses – mass clearing should not occur unless the cleared areas are to be surfaced or prepared immediately afterwards. | Weekly |
| Where cleared areas will be exposed for some time, these areas should be protected with packed brush, or appropriately battered with fascine work. Alternatively, jute (Soil Saver) may be pegged over the soil to stabilise it. | Weekly |
| Cleared areas that have become invaded can be sprayed with appropriate herbicides provided that these are such that break down on contact with the soil. Residual herbicides should not be used. | Weekly |
| Although organic matter is frequently used to encourage regrowth of vegetation on cleared areas, no foreign material for this purpose should be brought onto site. Brush from cleared areas should be used as much as possible. The use of manure or other soil amendments is likely to encourage invasion. | Weekly |
| Clearing of vegetation is not allowed within 32m of any wetland, 80m of any wooded area, within 1:100 year floodlines, in conservation servitude areas or on slopes steeper than 1:3, unless permission is granted by the ECO for specifically allowed construction activities in these areas. | Weekly |
| Care must be taken to avoid the introduction of alien plant species to the site and surrounding areas. (Particular attention must be paid to imported material such as building sand or dirty earth-moving equipment.) Stockpiles should be checked regularly and any weeds emerging from material stockpiles should be removed. | Weekly |
| Alien vegetation regrowth on areas disturbed by construction must be controlled throughout the entire site during the construction period. | Monthly |
| The alien plant removal and control method guidelines should adhere to best-practice for the species involved. Such information can be obtained from the DWAF Working for Water website. | Monthly |
| Clearing activities must be contained within the affected zones and may not spill over into demarcated No Go areas. | Daily |
| Pesticides may not be used. Herbicides may be used to control listed alien weeds and invaders only. | Monthly |
| Wetlands and other sensitive areas should remain demarcated with | Daily |

| | |
|--|--|
| appropriate fencing or hazard tape. These areas are no-go areas (this must be explained to all workers) that must be excluded from all development activities. | |
|--|--|

5.22.7 Concluding Statement

- As there are already a number of alien species present at the site, alien invasion following disturbance at the site is likely to occur rapidly. As a result, alien control should begin during the construction phase to ensure that the density and abundance of alien species remains manageable into the operational phase.
- In the short-term, soil disturbance is likely to be the dominant driver of alien invasion at the site. While, in the long-term the distribution of runoff is likely to be a key driver as those areas which receive water will be wetter and likely to contain a higher alien abundance.
- As disturbance is the major initial driver of alien species invasion, keeping the disturbance footprint to a minimum is a key element in reducing alien abundance. Wherever possible, the indigenous vegetation should be left intact as this will significantly reduce the likelihood of alien invasion.

5.23 OPEN SPACE MANAGEMENT

OUTCOME: To manage the undeveloped portions of the footprint to promote ecological diversity.

An open space management plan is attached in appendix G and is deemed to be an integral part of this EMP.

The solar facility development has been designed to be as concentrated / condensed as possible to keep it as small as is viably possible, and thereby limit the disturbance area associated with its construction and operation. As such, designated no open space areas have been included in the development design. However, the pan avoided by the solar development footprint, could be considered and managed as pockets of ‘open space’ with the development area.

The management of these no-go / ‘open space’ areas should essentially include the following three actions:

- As no-go open space areas, access through the drainage line (to the east) and the pan must be controlled (i.e. avoided entirely), in order to maintain the integrity of ecological, agriculture and archaeological resources found there. The no-go area demarcation (e.g. danger tape, signage etc.) implanted during pre-construction, must be maintained throughout the construction and rehabilitation phases.
- During the rehabilitation and operation phases alien plant invasion monitoring of these ‘open space areas’ must be undertaken on a 6-monthly basis and all alien plants found must be destroyed (ring-barking) and/or removed (cut down and herbicide applied).
- The Low-Level-River-Crossings (LLRC) which allow the crossing of the drainage line by the access road network, must be inspected on a regular (2-monthly) basis to ensure that no erosion is occurring and that there is no obstruction of the natural water flow. Any evidence of erosion found during this inspections must be rectified immediately and the cause of erosion pro-actively sought and remedied to avoid recurrence

Any impacts arising from within or associated with the development footprint i.e. erosion or invasion of alien vegetation etc., and entering the open space areas outside the solar facility, must be rectified immediately. The parameter of the solar facility must be monitored on a regular basis to ensure that these impacts are timeously identified and not allowed to re-occur.

6. OPERATIONAL PHASE ENVIRONMENTAL MANAGEMENT

The following environmental requirements are to be adopted and implemented during the operation phase:

6.1 PV PANEL MAINTENANCE REQUIREMENTS

OUTCOME: To ensure that PV panel maintenance activities do not directly, nor indirectly result in habitat degradation or pollution of resources..

Due to their nature, once installed, the photovoltaic panels will not require intensive maintenance other than periodic cleaning, greasing of bearings and inspection. The key maintenance activity is the cleaning / washing of the panels in order to remove dust and maintain optimum power generation.

6.1.1 Cleaning of PV Panels

Any rainfall on the solar panels would be welcomed due to its cleaning effect, but as mentioned before, the annual predicted rainfall is very low. Water for cleaning panels should take place using water from lawful sources on site or from the rainwater collection / storage systems. To further reduce the use of water at the solar facility, the use of alternative panel cleaning methods could be investigated. The use of robotic PV cleaners or high-pressure/low volume water cleaners, as well as compressed air can be considered, should the technology become commercially viable and available during the lifespan of the project.

In compliance with the EA, only biodegradable may be used for washing purposes. Care should be taken that the wash-water does not cause any erosion (Please refer to section dealing with washwater management described below).

Indeed, 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 / mowing 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 sand-blasting 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).

6.1.2 Management of Wash-water

A Stormwater, Erosion and Washwater Management Plan is attached in Appendix B and is deemed to form an integral part of this EMP

After construction, the washing of the solar panels once every quarter is likely to cause nominal additional run-off. The overall effect on the natural water courses is expected to be very low, due to the high evaporation potential and low rainfall of the area. No chemicals will be used to clean the panels, only water. If required, a biodegradable soap may be used.

6.1.3 Other Operation / Maintenance Requirements

- 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.
- The **tracks / pathways** (4m width) 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.
- **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.

- **Regular monitoring for erosion** to ensure that no erosion problems are occurring at the site as a result of the roads and other infrastructure. All erosion problems observed should be rectified as soon as possible.
- All maintenance vehicles to remain on the demarcated roads.
- The **septic tank**, associated with the ablution facilities at the on-site sub-station / maintenance buildings, must be maintained in full working condition.
- 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 (drainage lines etc.), and that the electrified strands are not causing animal electrocution.
- No unauthorized persons should be allowed onto the site.
- 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.
- Staff present during the operational phase should receive environmental education so as to ensure that that **no hunting, killing or harvesting of plants and animals** occurs.
- All **alien plants present at the site should be controlled** at least twice a year using the best practice methods for the species present.
- **Bare soil should be kept to a minimum**, and at least some grass or low shrub cover should be encouraged under the panels.
- **No pets** (cats and dogs) should be allowed within the solar facility.

6.2 OPERATION WASTE MANAGEMENT

The following items are to be implemented with regard to waste management during the operational phase of the project.

6.2.1 Litter management

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.

6.2.2 Scrap Metal

Recycling of scrap metal is recommended. Scrap metal must be disposed of off-site at suitable facilities.

6.2.3 Hazardous Waste

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 approved/registered hazardous-waste landfill site. The Contractor shall provide disposal certificates to the Site Manager.

Used oil and grease must be removed from site to an approved used oil recycling company.

Under NO circumstances may any hazardous waste be spoiled on the site.

The servicing of operation/maintenance vehicles should take place off-site.

6.3 PLANT RESCUE AND PROTECTION.

OUTCOME: To reduce the impact on the botanical features during operation.

A Plant rescue and protection plan is attached in Appendix D. The following actions terms of this plan must be adopted for the operational phase of the project lifecycle.

- Access to the site should be strictly controlled and all personnel entering or leaving the site should be required to sign and out with the security officers.

- The collecting of plants or their parts should be strictly forbidden and signs stating so should be placed at the entrance gates to the site.

6.4 ALIEN VEGETATION MANAGEMENT

An Alien Vegetation Management Plan is attached in Appendix F of this EMPr

The following management actions are aimed at reducing the abundance of alien species within the site and maintaining non-invaded areas clear of aliens.

Table 7: Alien vegetation management requirements during operation.

| Action | Frequency |
|---|---|
| Surveys for alien species should be conducted regularly. Every 6 months for the first two years after construction and annually thereafter. All aliens identified should be cleared. | Every 6 months for 2 years and annually thereafter |
| Where areas of natural vegetation have been disturbed by construction activities, revegetation with indigenous, locally occurring species should take place where the natural vegetation is slow to recover or where repeated invasion has taken place following disturbance. | Biannually, but revegetation should take place at the start of the rainy season |
| Areas of natural vegetation that need to be maintained or managed to reduce plant height or biomass, should be controlled using methods that leave the soil protected, such as using a weed-eater to mow above the soil level. | When necessary |
| No alien species should be cultivated on-site. If vegetation is required for esthetic purposes, then non-invasive, water-wise locally-occurring species should be used. | When necessary |

7. CLOSURE & DECOMMISSIONING PHASE ENVIRONMENTAL MANAGEMENT

After the lifespan of the facility (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.

Table 8: Legislative requirements for a closure plan.

| 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 |

| Requirement |
|--|
| 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 – <ul style="list-style-type: none"> (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 – <ul style="list-style-type: none"> (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; (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; (iv) Where applicable, an indication of the amendments made to the plan as a result of public participation processes conduction in terms of regulation 41 of these Regulations. |
| (j) Where applicable, details of any financial provisions for the rehabilitation, closure and ongoing post decommissioning management of negative environmental impacts. |

¹Within 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 (Joe Moralong Municipality), as well as the Provincial and National Environmental Authorities (the Northern Cape Department of Environmental Affairs & Nature Conservation (DEANC) and the Department of Environmental Affairs (DEA)) 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, 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:

7.1 SCENARIO 1: TOTAL CLOSURE & DECOMMISSIONING OF SOLAR FACILITY

If the decision is taken at the end of the project lifespan (30-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;

¹ Closure and decommissioning may take place after the after the term of the Purchase Power Agreement.

- 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 donated to local rural schools and clinics upon facility closure and 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 of the proceeds to pay the local labor 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).

7.2 SCENARIO 2: PARTIAL DECOMMISSIONING / UPGRADE OF SOLAR FACILITY

Due to low variable costs and loans repaid long ago, any owner the facility may be interested in prolonging technical, functional, legal and economic lives of the plans 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 yrs;
- 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.

8. MONITORING AND AUDITING

Environmental monitoring and audits are fundamental in ensuring the implementation of the management actions contained within this EMP, environmental sustainable development and maintenance of Hotazel Solar. .

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

- The operators of the facility;
- The local authority (Joe Moralong Municipality);
- The provincial environmental authority: Department of Environmental Affairs & Nature Conservation (DENC);
- The national environmental authority: Department of Environmental Affairs (DEA); 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.

Appendix 7 of Regulation 982 of the 2014 EIA Regulations contains the required contents of an Environmental Audit Report. 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 9: Contents of an audit report

| (1) An Environmental audit report prepared in terms of these Regulations must contain: |
|---|
| (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. |
| (h) A description of an 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. |

8.1 ECO CONSTRUCTION MONITORING

The ECO is responsible for environmental monitoring during construction as per the requirements of this EMPr. The monthly environmental monitoring reports compiled by the ECO, as well as the

photographic record of works, must be submitted to the operators of the facility, the local authority, the provincial environmental authority, the national environmental authority and Eskom.

8.2 RECORDING AND REPORTING TO THE DEA.

The following recording and reporting requirements are required:

- 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.
- All documentation eg. Audit/monitoring/compliance reports and notifications required to be submitted to the department in terms of the EA, must be submitted to the Director: Compliance monitoring.

8.3 ENVIRONMENTAL AUDIT REPORT

The holder of the EA must submit an environmental audit report to the department within 30 days of completion of the construction phase (i.e. within 30 Days of site handover) and within 30 days of completion of rehabilitation activities.

This environmental audit report must:

- Be compiled an independent environmental auditor;
- Indicate the date of the audit, the name of the auditor and the outcome of the audit;
- Evaluate compliance with the requirements of the approved EMPr and the Environmental Authorisation;
- Include measures to be implemented to attend to any non-compliances or degradation noted;
- Include copies of approvals granted by other authorities relevant to the development for the reporting period;
- Highlight any outstanding environmental issues that must be addressed, along with recommendations for ensuring these issues are appropriately addressed;
- Include a copy of the EA and the approved EMPr;
- Include all documentation such as waste disposal certificates, hazardous waste landfill site licences etc, pertaining to this authorisation; and
- Include evidence of adherence to the conditions of this authorisation and the EMPr where relevant such as training records and attendance registers.

Further to these requirements, this audit report must also comply with the requirements of an audit as highlighted in Annexure 7 of R982 and included in Table 9 above.

8.4 PLANT RESCUE MONITORING REQUIREMENTS

A plant rescue and protection plan is attached in Appendix D of this EMPR. The following reporting and monitoring requirements are recommended as part of the plant rescue and protection plan:

- Preconstruction walk-through report detailing the location and distribution of all listed and protected species. This should include a walk-through of all infrastructure including all new access roads, PV array areas, underground cables, power line routes, buildings and substations. The report should include recommendations of route adjustments where necessary, as well as provide a full accounting of how many individuals of each listed species will be impacted by the development. (This has already taken place by Ecological expert, Mr Simon Todd)
- Monitoring during construction by the ECO to ensure that listed species and sensitive habitats are avoided. All incidents should be recorded along with the remedial measures implemented.

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

8.5 HABITAT RESTORATION MONITORING REQUIREMENTS

A habitat restoration plan is attached in **Appendix E** of the EMPr.

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.

8.6 ALIEN VEGETATION MONITORING DURING THE CONSTRUCTION PHASE

An alien vegetation management plan is attached in Appendix F.

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

Table 10: 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 |

8.7 ALIEN VEGETATION MONITORING DURING THE OPERATIONAL PHASE

An alien vegetation management plan is attached in Appendix F.

The following monitoring and evaluation actions should take place during the operational phase of the development.

Table 11: 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 | Decline in vulnerable bare areas over time | Biannually |

| | | |
|-------|--|--|
| areas | | |
|-------|--|--|

9. METHOD STATEMENTS

Method statements are written submissions by the Contractor to the Engineer and ECO in response to the requirements of this EMPr or in response to a request by the Engineer 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 Engineer 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 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.

9.1 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);
- Ramming and jack hammering;
- Re-vegetation, rehabilitation and re-seeding.

10. HEALTH AND SAFETY

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 aforesaid 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).

11. CONTRACTORS CODE OF CONDUCT

The Contractor's Code of Conduct is a document to be drawn up by the solar facility Developer 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 Hotazel Solar 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 the all service agreements.

11.1 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. Particularly the water quality entering and exiting the on-site washes/minor drainage lines;
- Construction and development are undertaken with due consideration to all environmental factors;
- Where such damage occurs, provision is made for re-instatement and rehabilitation;

11.2 ACCEPTANCE OF REQUIREMENTS

In order to achieve these objectives, the Developer and 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 Hotazel Solar.

11.3 CONTRACTOR'S PRE-CONSTRUCTION OBLIGATIONS

Contractors may not commence any construction on Hotazel Solar 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);
- 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 (this has already been done);
- A permit for the removal or relocation-and-transplant of these protected / listed plant species has been obtained from the Kimberly office of the Northern Cape Department of Environmental Affairs & Nature Conservation (DEANC);
- Search and rescue of sensitive plants, within the development footprint has been carried out in compliance with the plant rescue and protection plan in appendix D 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 (Joe Moralong Municipality); and
- All contract staff has attended the required environmental induction training and on-going environmental education sessions, as necessary.

11.4 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 detailed therein:
 - Transport & Traffic Management Plan,
 - Stormwater and Erosion-Control Management Plan,
 - Vegetation Clearing & Plant Rescue Plan,
 - Re-vegetation & Rehabilitation Plan,
 - Alien Management Plan
 - Open Space Management Plan;
- 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; and
- The Contractor shall only be permitted to erect a single signboard which must comply with legislative requirements.

12. SITE DEVELOPMENT PLAN

The Site Development Plan (SDP) is attached in Appendix A of this EMPr. Approval of this EMPr infers approval of the SDP. The holder of the EA and the contractor must ensure that all works are undertaken in approximation to the SDP. Should there be any dispute on any aspect of the works in relation to the SDP, the ECO must make ruling, which should be referred to the CA if necessary.

The table below shows the key components as defined in the SDP and the EMPr applicability of each of these component's.

Table 12: EMP Sections applicable to SDP Components

| SDP Component | EMPr Applicability |
|---------------------|------------------------|
| Construction Road | Sections 4, 5, 6,7 & 8 |
| Perimeter Road | Sections 4, 5, 6,7 & 8 |
| Internal Roads | Sections 4, 5, 6,7 & 8 |
| Access Road | Sections 4, 5, 6,7 & 8 |
| Perimeter Fencing | Sections 5 |
| PV Panels | Sections 4, 5, 6,7 & 8 |
| Inverter Stations | Sections 4, 5, 6,7 & 8 |
| AC Cabling | Sections 4 & 5, |
| Sub-Station | Sections 4, 5, 6,7 & 8 |
| Monitoring Building | Sections 4 & 5 |
| Laydown Area | Section 5 |
| Evacuation Line | |

13. IMPLEMENTATION

The following table is provided to assist the developer, design team, engineer and contractor with the effective implementation of this EMPr. The table below serves as a quick reference guide to the EMPr, but must be read in conjunction with the entire document.

| Item | Management Action | Timing | Responsible Party | Monitoring |
|---|--|--|---|---|
| Design & Pre-Construction Phase | | | | |
| Familiarisation with the contents of the EMPr & EA. | Attendance of a pre-construction environmental compliance workshop | Prior to commencement of site clearing & earthworks. | ECO, Engineers, Contractor & Project Management. | ECO to include details of this in the first environmental control Report. |
| | Environmental induction of all staff. | Prior to commencement of earthworks. | ECO and all contract staff. | Contractor to keep records of all staff attending inductions. |
| Demarcation of Development Areas and No-Go Areas. | All areas outside of the construction / development area to be clearly demarcated. Pan areas, and all sensitive drainage lines & vegetation outside development area are considered no-go. | Prior to commencement of site clearing & earthworks. | Contractor with input from the Engineer, ECO and participating specialists where necessary. Contractor responsible for maintaining demarcation throughout the construction phase. | ECO to maintain photographic record of demarcation. |
| Obtain Permit for removal / translocation of protected plant species. | Permit application to be informed by list of protected plant species found by the ecological specialist within the final facility development footprint. Permit requirements & list to inform updated plant rescue plan. | Prior to plant rescue and vegetation clearing. | ECO, ESA, Ecological Specialist & Contractor | ECO & Ecological specialist to provide photographic record of protected plant species (to be used in on-going Environmental Education) and of plant rescue & translocation operation. |
| Panel and Powerline Pylon siting / walk down | As defined in the EMPr | Prior to finalisation of detailed design. | Developer with input from ECO, Engineer and relevant participating specialists | ECO to include details in monthly reports. |
| Environmental Induction Training | As defined in the EMPr | Prior to commencement of site clearing & earthworks. | ECO & Contractor | Contractor to provide details to ECO. ECO to provide details in monthly reports. |
| Construction Phase | | | | |
| Minimise impact of construction vehicles | Implementation of recommendations of Transport & Traffic Plan defined in EMPr. | Throughout construction phase | Contractor | Engineer |
| Prevent concrete contamination | Use of delivered ready-mix concrete. Control at batching sites | Throughout construction phase | Contractor | Engineer, ESA and ECO. |
| Prevention of erosion of | Implementation of recommendations of | During detailed design and | Contractor | Engineer, ESA and ECO. |

| Item | Management Action | Timing | Responsible Party | Monitoring |
|--|--|--|---------------------------------------|---------------------------|
| cable trenches | Erosion Management Plan defined in EMPr. | throughout the construction phase. | | |
| Protection of Archaeological Resources | Avoidance of drainage line and pans within and outside development area and quartz patches as far as possible. Report archaeological occurrences found during earthworks to NCHRA & SAHRA. | Demarcation of sites prior to commencement of earthworks. Other mitigations throughout the construction phase. | Contractor | ESA, ECO & archaeologist. |
| Protection of hydrological resources (surface & underground). | As per the requirements of the EMPr. | Throughout the construction phase. | Contractor | ECO |
| Protection of all topsoil resources on site. | As per the requirements of the EMPr i.e. brush/straw packing & re-seeding | Throughout the construction phase. | Contractor | ECO |
| Construction of Cable Trenches | As per the requirements of this EMPr. | Throughout the construction phase | Contractor | ECO |
| Limiting damage caused by the installation of overhead lines. | As per the requirements of this EMPr. | Design phase and throughout the construction phase. | Design Team & Contractors | ECO & ER |
| Limiting Noise Impact | As per the requirement of the EMPr. | Design, throughout the construction and operation phase | Contractor, ER | ECO & ER |
| Reduction of dust generation as a result of construction activities. | As per the requirements of the EMPr. Do not strip topsoil from entire development footprint | Throughout the construction phase | Contractor | ECO & ER. |
| Providing for effective ecological corridors | Implementing the fencing requirements as defined by the ecological specialist and this EMPr. | Design and construction phases. | ER & Contractor | ECO & ER. |
| Limit environmental damage from blasting, drilling, jackhammering and trenching activities including that on existing boreholes. | Implementing the requirements for blasting detailed in this EMPr. | Throughout the construction phase. | Contractor | ECO & ER. |
| Preventing of Erosion and siltation of the wash / drainage lines. | Implementation of Stormwater Management and Erosion Control Measures detailed in this EMPr, as well as those made by the ecological | Design phase and throughout the construction phase | Design Team, Engineer and Contractors | ECO & ER. |

| Item | Management Action | Timing | Responsible Party | Monitoring |
|---|--|---|--|--|
| | specialists. | | | |
| Protection of protected plant species and on-going re-vegetation & rehabilitation. | Implementation of Plant Rescue, Re-vegetation & Rehabilitation Plan, as well as recommendation of ecological specialist. | Design phase and throughout the construction phase. | Design Team, Engineer and Contractors | ECO & ER. |
| Prevention of theft and other crime. | Development of a job site security plan. | Before commencement of construction. | Contractor | ER |
| On-going Environmental Education | As defined in the EMPr. | During construction. | ECO & Contractor | Contractor to provide details to ECO. ECO to provide details in monthly reports. |
| Prevent pollution resulting from oil and fuel storage and handling. | Implement correct fuel and oil handling procedures. Implement emergency spill response plan. | Duration of the project lifespan. | ECO & Contractor | ECO, ER & Contractor |
| Operational Phase | | | | |
| Prevent pollution resulting from oil and fuel storage and handling. | Implement correct fuel and oil handling procedures. Implement emergency spill response plan. | Duration of the project lifespan | Facility operator | Facility manager and Environmental Authority. |
| Manage vegetation growth | Trimming of vegetation under panels to avoid overshadowing and fire risk. | Throughout operation | Operation & Maintenance staff. | Operation staff to report to Operator. |
| Prevent & manage erosion / obstruction of washes / drainage lines | Regular monitoring of wash to remove obstructions and repair erosion. | Throughout operation | Operation & Maintenance staff. | Operation staff to report to Operator. |
| Control of alien plants | Regular monitoring and removal of alien invasive plant species. | Throughout operation | Operation & Maintenance staff. | Operation staff to report to Operator. |
| On-going Environmental Education | As defined in the EMPr | During maintenance and operation. | Operation & Maintenance staff. | Operation staff to report to Operator. |
| Closure & Decommissioning Phase | | | | |
| Items, management, responsibilities and monitoring as per construction phase, as above. | | | | |
| Decommissioning of Solar facility. | Closure of facility in compliance with legislation and this EMPr. | After lifespan of project. | Facility operator & Joe Moralong local municipality. | Local, provincial and national Authorities |
| On-going Environmental Education | As defined in the EMPr | During decommissioning. | ECO & Contractor | Contractor report to ECO. ECO to provide details in monthly reports. |

14. NON-COMPLIANCE

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 two years or to a fine not exceeding an amount 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 ER 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.

14.1 PROCEDURES

The contractor shall comply with the environmental specifications and requirements of this EMPr, the Environmental Authorisation (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 ER, stating the nature and magnitude of the contravention. A copy shall be provided to the Project Developer / Proponent.
- The ER will issue this notice to the Contractor.
- The Contractor shall act to correct the transgression within the period specified by the ER.
- The Contractor shall provide the ER 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 time frame, the ER 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 ER (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 ER 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 ER on advice from the ECO shall at all times have the right to stop work and/or certain activities on site in the case of non-compliance or failure to implement remediation measures.

14.2 OFFENCES AND PENALTIES

Any avoidable non-compliance with the conditions of the EMPr shall be considered sufficient ground for the imposition of a penalty by the Engineer

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.

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16. PHOTOGRAPHS, DESCRIPTIONS OF POTENTIAL PROTECTED PLANT SPECIES AT HOTAZEL SOLAR

Species of conservation concern are illustrated below. The list includes species listed as threatened under the South African Red Data List of Plants, as well as those species which are provincially protected and are either significant or suitable for search and rescue. Common species within protected genera are not illustrated, but will nevertheless need to be listed on the permit application to clear the site.

These photographs can be used for environmental education purposes during the construction phase of the project to ensure that all construction staff are made aware of the protected status of these species. This photographic record of protected plant species, particularly those suitable for rescue and translocation, will have to be updated after the pre-construction survey by the ecologist.

16.1 BOSCIA FOETIDA



| | |
|----------------------------|--|
| Status | Provincially Protected |
| Suitable for search rescue | No |
| Abundance at site | Occasional |
| Description | Small tree, usually with white stems. Produces small green flowers and small round fruits. |

Figure 3: *Boscia foetida*

16.2 HOODIA GORDONII



Figure 4: *Hoodia gordonii*

| | |
|----------------------------|----------------------|
| Status | Nationally Protected |
| Suitable for search rescue | Yes |

| | |
|-------------------|---|
| Abundance at site | Occasional |
| Description | Stem succulent up to 1m tall, but usually lower. Has spiny upright stems 5-10 cm wide. Produces large brownish flowers. |

16.3 ACACIA ERIOLOBA



Figure 5: *Acacia erioloba*

Description:

- Medium-sized to large deciduous or semi-evergreen tree; crown usually flat-topped, dome shaped or rounded. Older branches often contorted.
- Bark thick, rough and deeply longitudinally fissured.
- Spines paired, straight, often swollen and fused at the base, white or reddish.
- Leaves bipinnately compound; leaflets prominently veined below.
- Flowers in globose heads, bright golden-yellow.
- Pods large, flat, thick and semi-woody, velvety grey, half moon-shaped, indehiscent.
- Usually on red Kalahari sands, often more abundant along drainage lines.

16.4 ALOE DICHOTOMA



Figure 6: *Aloe dichotoma*

Description

- Small succulent tree with a thickened trunk and dense rounded crown.

- Leaves succulent, in terminal rosettes, blue-green or yellowish green; margin with small yellowish brown teeth.
- Inflorescence branched, borne terminally above a leaf rosette; flower spikes about 300 mm long, bright yellow.
- On rocky hills and sandy flats throughout most of the Northern Cape.

17. PHOTOS & DESCRIPTION OF POTENTIAL ALIEN PLANT SPECIES ON SITE

17.1 PROSOPIS GLANDULOSA

Category 1

Medium to large tree with pinnate leaves and usually thorny. Usually associated with drainage lines, but may grow anywhere. Occasional at the site, but can increase rapidly as a result of disturbance.

When cut down the tree resprouts, so herbicides are usually needed in combination with cutting. The appropriate techniques and herbicides can be obtained from the DAFF website.

Figure 7: *Prosopis glandulosa*



17.2 ARGEMONE OCHROLEUCA

White – flowered Mexican poppy. Category 1.



Figure 8: *Argemone ochroleuca*

17.3 SALSOLA KALI

Tumbleweed, Tolbos. Not Listed.



Figure 9: *Salsola kali*



environmental affairs

Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

Private Bag X 447· PRETORIA · 0001· Environment House · 473 Steve Biko Road, Arcadia · PRETORIA

DEA Reference: 14/12/16/3/3/2/1086

Enquiries: Bongeka Mtyana

Telephone: 012-399-9376 **E-mail:** BMtyana@environment.gov.za

Mr. Robert Wagener
ABO Wind Hotazel PV (Pty) Ltd
101, Block A, West Quay Building, 7 West Quay Building, Waterfront
CAPE TOWN
8000
Tel: (021) 418 2596
Cell: (084) 401 9015
E-mail: david@atlanticep.com.

PER E-MAIL / MAIL

Dear Mr Wagener

APPLICATION FOR ENVIRONMENTAL AUTHORISATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, ACT NO. 107 OF 1998, AS AMENDED: GN R982, 983 and 984, AS AMENDED: PROPOSED CONSTRUCTION OF HOTAZEL SOLAR AND ASSOCIATED INFRASTRUCTURE WITHIN JOE MOROLONG LOCAL MUNICIPALITY IN THE NORTHERN CAPE PROVINCE

With reference to the above application, please be advised that the Department has decided to grant authorisation. The Environmental Authorisation (EA) and reasons for the decision are attached herewith.

In terms of Regulation 4(2) of the Environmental Impact Assessment Regulations, 2014, as amended (the EIA Regulations), you are instructed to notify all registered interested and affected parties, in writing and within 14 (fourteen) days of the date of the EA, of the Department's as well as the provisions regarding the submission of appeals that are contained in the Regulations.

In terms of the Promotion of Administrative Justice Act, 2000 (Act No 3 of 2000), you are entitled to the right to fair, lawful and reasonable administrative action; and to written reasons for administrative action that affects you negatively. Further your attention is drawn to the provisions of the Protection of Personal Information Act, 2013 (Act no. 4 of 2013) which stipulates that the Department should conduct itself in a responsible manner when collecting, processing, storing and sharing an individual or another entity's personal information by holding the Department accountable should the Department abuses or compromises your personal information in any way.

Your attention is drawn to Chapter 2 of National Environmental Management Act, 1998 (Act No. 107 of 1998) National Appeal Regulations published under Government Notice R993 in Government Gazette No. 38303 dated 08 December 2014 (National Appeal Regulations, 2014), which prescribe the appeal procedure to be followed. Kindly include a copy of this document (National Appeal Regulations, 2014) with the letter of notification to interested and affected parties in this matter.

M.S

Should any person wish to lodge an appeal against this decision, he/she must submit the appeal to the appeal administrator, and a copy of the appeal to the applicant, any registered interested and affected party, and any organ of state with interest in the matter within 20 days from the date that the notification of the decision was sent to the registered interested and affected parties by the applicant; or the date that the notification of the decision was sent to the applicant by the Department, whichever is applicable.

Appeals must be submitted in writing in the prescribed form to:

The Director: Appeals and Legal Review of this Department at the below mentioned addresses.

By email: appealsdirector@environment.gov.za;

By hand: Environment House
473 Steve Biko
Arcadia
Pretoria
0083; or

By post: Private Bag X447
Pretoria
0001

Please note that in terms of Section 43(7) of the National Environmental Management Act, Act No. 107 of 1998, as amended, the lodging of an appeal will suspend the environmental authorisation or any provision or condition attached thereto. In the instance where an appeal is lodged, you may not commence with the activity until such time that the appeal is finalised.

To obtain the prescribed appeal form and for guidance on the submission of appeals, please visit the Department's website at https://www.environment.gov.za/documents/forms#legal_authorisations or request a copy of the documents at appealsdirector@environment.gov.za.

Yours faithfully



Mr Sabelo Malaza
Chief Director: Integrated Environmental Authorisations
Department of Environmental Affairs

Date: 30/05/2019

| | | | | |
|-----|---------------------------|---------------------------------|-------------------|---|
| CC: | Mr. T Mac Donald Bloom | Joe Morolong Local Municipality | Tel: 053 773 9300 | Email: registry@joemorolong.gov.za |
| | Mr.P Jansen | Land owner | Tel: 082 319 6095 | Email: pac.jansen@vodamail.co.za |
| | Mr D Holder | EAP | Tel:044 874 0365 | Email: dale@cape-eaprac.co.za |

M.S



environmental affairs

Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

Environmental Authorisation

In terms of Regulation 25 of the Environmental Impact Assessment Regulations, 2014, as amended

Construction of Hotazel Solar and associated infrastructure within Joe Morolong Local Municipality in the Northern Cape Province

John Taolo Gaetsewe District Municipality

| | |
|---------------------------------------|---|
| Authorisation register number: | <i>14/12/16/3/3/2/1086</i> |
| Last amended: | <i>First issue</i> |
| Holder of authorisation: | <i>ABO Wind Hotazel PV (PTY) LTD</i> |
| Location of activity: | <i>NORTHERN CAPE PROVINCE: Within Joe Morolong Local Municipality</i> |

This Environmental Authorisation does not negate the holder of the authorisation's responsibility to comply with any other statutory requirements that may be applicable to the undertaking of the activity.

M.S

Decision

The Department is satisfied, on the basis of information available to it and subject to compliance with the conditions of this Environmental Authorisation, that the applicant should be authorised to undertake the activities specified below.

Non-compliance with a condition of this Environmental Authorisation may result in criminal prosecution or other actions provided for in the National Environmental Management Act, Act No. 107 of 1998, as amended and the EIA Regulations, 2014, as amended.

Details regarding the basis on which the Department reached this decision are set out in Annexure 1.

Activities authorised

By virtue of the powers conferred on it by the National Environmental Management Act, Act No. 107 of 1998, as amended and the Environmental Impact Assessment Regulations, 2014, as amended, the Department hereby authorises –

ABO WIND HOTAZEL PV (PTY) LTD

(hereafter referred to as the **holder of the authorisation**)

with the following contact details –

Mr. Robert Wagener

ABO Wind Hotazel PV (Pty) Ltd

101, Block A, West Quay Building, 7 West Quay Building, Waterfront

CAPE TOWN

8000

Tel: (021) 418 2596

Cell: (084) 401 9015

E-mail: david@atlanticep.com

to undertake the following activities (hereafter referred to as "the activity") indicated in Listing Notice 1 and Listing Notice 2, as amended (GN R983 and R984, as amended):

| Listed activities | Activity/Project description |
|--|---|
| <p><u>GN R983 Item 11 as amended (Listing Notice 1):</u> The development of facilities or infrastructure for the transmission and distribution of electricity- (i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts;</p> | <p>The proposed Hotazel Solar facility will connect to the national Eskom grid via the Eskom Hotazel Substation. The proposed distribution infrastructure includes the construction of an on-site Substation and a 132kV OHL from the on-site substation.</p> |
| <p><u>GN R983 Item 28 as amended (Listing Notice 1):</u> Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture or afforestation on or after 01 April 1998 and where such development: (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.</p> | <p>The area is currently utilised for limited agricultural purposes. The construction of a Solar Energy Facility is considered as commercial use.</p> |
| <p><u>GN R983 Activity 24 as amended (Listing Notice 1):</u> The Development of a road – (ii) with a reserve wider than 13.5m or where no road reserve exists where the road is wider than 8m.</p> | <p>The current proposal is to upgrade the existing access roads to up to 8m, however the road prism inclusive of side drain will exceed the 8m threshold of this activity.</p> |
| <p><u>GN R983 Activity 56 as amended (Listing Notice 1):</u> The widening of a road by more than 6 metres, or the</p> | <p>The proposed access roads utilise existing accesses to this portion of land. The</p> |

M.S

| Listed activities | Activity/Project description |
|--|--|
| <i>lengthening of a road by more than 1 kilometre – (ii) where no reserve exists, where the existing road is more than 8 metres</i> | lengthening of these access roads by more than 1km may be required, at the access from the R31 will be lengthened to a point where it enters the laydown area. |
| <u>GN R984 Activity 1 as amended (Listing Notice 2):</u> <i>The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more, excluding where such development of facilities or infrastructure is for photovoltaic installations and occurs within an urban area.</i> | The proposed Hotazel Solar facility will have a maximum generation Capacity of 100 megawatts (AC) and as such exceeds the threshold defined in this activity |
| <u>GN R984 Activity 15 as amended (Listing Notice 2):</u> <i>The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for- (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan.</i> | The proposed Hotazel Solar facility will have a maximum footprint of 275ha and as such exceeds the threshold defined in this activity. |

as described in the Environmental Impact Assessment Report (EIAr) dated 29 March 2019 at:

Farm Name: Farm York A 279

21 Digit SG code:

| | | | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| C | 0 | 4 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 7 | 0 | 0 | 0 | 0 | 0 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|

| Layout Alternative 2 (Preferred) | Latitude | Longitude |
|----------------------------------|---------------|---------------|
| North-West Corner | 27°13'22.47"S | 22°58'21.61"E |
| North-East Corner | 27°12'26.34"S | 22°59'43.30"E |
| South-West Corner | 27°13'45.51"S | 22°58'52.73"E |
| South-East Corner | 27°13'11.50"S | 22°59'55.00"E |

| Powerline alternative D (Preferred LILO) | Latitude | Longitude |
|--|---------------|---------------|
| Start | 27°13'27.36"S | 22°59'20.92"E |
| Middle | 27°13'25.54"S | 22°59'22.93"E |
| End | 27°12'21.31"S | 22°57'27.45"E |

the location indicated in the locality plan, attached as Annexure 2 of this authorisation

- for the construction of the Hotazel Solar and associated infrastructure on the remaining Extent of the farm York A 279, in the District of Hotazel in the Northern Cape Province.

Technical details of preferred alternative:

| Component | Description/ Dimensions |
|--|---|
| Location of the site | Approximately 3km South East of Hotazel |
| PV Panel area | 250 ha with a total project footprint of approximately 275 ha |
| Preferred Site access | Access to the site will be at one of the existing access points from the R31 |
| Export capacity | 100 MW |
| Proposed technology | PV with fixed, single or double axis tracking technology. |
| Height of installed panels from ground level | PV Structures not more than 4m |
| Width and length of internal roads | Access Road - width: 8m+, length: ± 1 km Secondary internal roads – width: mm, length: ± 15 km |

Conditions of this Environmental Authorisation

Scope of authorisation

1. The construction of the Hotazel Solar and associated infrastructure on the remaining Extent of the farm York A 279, in the District of Hotazel in the Northern Cape Province is approved as per the geographic coordinates cited in the table above on page 4 and 5.
2. Authorisation of the activity is subject to the conditions contained in this Environmental Authorisation, which form part of the Environmental Authorisation and are binding on the holder of the authorisation.
3. The holder of the authorisation is responsible for ensuring compliance with the conditions contained in this Environmental Authorisation. This includes any person acting on the holder's behalf, including but not limited to, an agent, servant, contractor, sub-contractor, employee, consultant or person rendering a service to the holder of the authorisation.
4. The activities authorised may only be carried out at the property as described above.
5. Any changes to, or deviations from, the project description set out in this Environmental Authorisation must be approved, in writing, by the Department before such changes or deviations may be effected. In assessing whether to grant such approval or not, the Department may request such information as it deems necessary to evaluate the significance and impacts of such changes or deviations and it may be necessary for the holder of the authorisation to apply for further Environmental Authorisation in terms of the regulations.
6. The holder of an Environmental Authorisation must apply for an amendment of the Environmental Authorisation with the Competent Authority for any alienation, transfer or change of ownership rights in the property on which the activity is to take place.
7. This activity must commence within a period of five (05) years from the date of issue of this Environmental Authorisation. If commencement of the activity does not occur within that period, the authorisation lapses and a new application for Environmental Authorisation must be made in order for the activity to be undertaken.
8. Commencement with one activity listed in terms of this Environmental Authorisation constitutes commencement of all authorised activities.

Notification of authorisation and right to appeal

9. The holder of the authorisation must notify every registered interested and affected party, in writing and within 14 (fourteen) calendar days of the date of this Environmental Authorisation, of the decision to authorise the activity.
 10. The notification referred to must –
-

- 10.1. specify the date on which the authorisation was issued;
- 10.2. inform the interested and affected party of the appeal procedure provided for in the National Appeal Regulations, 2014;
- 10.3. advise the interested and affected party that a copy of the authorisation will be furnished on request; and
- 10.4. give the reasons of the Competent Authority for the decision.

Commencement of the activity

11. The authorised activity shall not commence until the period for the submission of appeals has lapsed as per the National Appeal Regulations, 2014, and no appeal has been lodged against the decision. In terms of Section 43(7), an appeal under Section 43 of the National Environmental Management Act, Act No. 107 of 1998, as amended will suspend the Environmental Authorisation or any provision or condition attached thereto. In the instance where an appeal is lodged you may not commence with the activity until such time that the appeal has been finalised.

Management of the activity

12. The Environmental Management Programme (EMPr) submitted as part of the Application for EA is hereby approved. This EMPr must be implemented and strictly adhered to.

Frequency and process of updating the EMPr

13. The EMPr must be updated where the findings of the environmental audit reports, contemplated in Condition 23 below, indicate insufficient mitigation of environmental impacts associated with the undertaking of the activity, or insufficient levels of compliance with the Environmental Authorisation or EMPr.
14. The updated EMPr must contain recommendations to rectify the shortcomings identified in the environmental audit report.
15. The updated EMPr must be submitted to the Department for approval together with the environmental audit report, as per Regulation 34 of GN R982 of 04 December 2014, as amended. The updated EMPr must have been subjected to a public participation process, which process has been agreed to by the Department, prior to submission of the updated EMPr to the Department for approval.

16. In assessing whether to grant approval of an EMPr which has been updated as a result of an audit, the Department will consider the processes prescribed in Regulation 35 of GN R982 of 04 December 2014, as amended. Prior to approving an amended EMPr, the Department may request such amendments to the EMPr as it deems appropriate to ensure that the EMPr sufficiently provides for avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity.
17. The holder of the authorisation may apply for an amendment of an EMPr, if such amendment is required before an audit is required. In assessing whether to grant such approval or not, the Department will consider the processes and requirements prescribed in Regulation 37 of GN R982 of 04 December 2014, as amended.

Monitoring

18. The holder of the authorisation must appoint an experienced independent Environmental Control Officer (ECO) for the construction phase of the development that will have the responsibility to ensure that the mitigation/rehabilitation measures and recommendations referred to in this environmental authorisation are implemented and to ensure compliance with the provisions of the approved EMPr.
 - 18.1. The ECO must be appointed before commencement of any authorised activities.
 - 18.2. Once appointed, the name and contact details of the ECO must be submitted to the *Director: Compliance Monitoring* of the Department.
 - 18.3. The ECO must keep record of all activities on site, problems identified, transgressions noted and a task schedule of tasks undertaken by the ECO.
 - 18.4. The ECO must remain employed until all rehabilitation measures, as required for implementation due to construction damage, are completed and the site is ready for operation.

Recording and reporting to the Department

19. All documentation e.g. audit/monitoring/compliance reports and notifications, required to be submitted to the Department in terms of this Environmental Authorisation, must be submitted to the *Director: Compliance Monitoring* of the Department at Directorcompliance@environment.gov.za.
20. The holder of the Environmental Authorisation must, for the period during which the Environmental Authorisation and EMPr remain valid, ensure that project compliance with the conditions of the Environmental Authorisation and the EMPr are audited, and that the

audit reports are submitted to the *Director: Compliance Monitoring* of the Department at Directorcompliance@environment.gov.za.

21. The frequency of auditing and of submission of the environmental audit reports must be as per the frequency indicated in the EMPr, taking into account the processes for such auditing as prescribed in Regulation 34 of GN R982 of 04 December 2014, as amended.
22. The holder of the authorisation must, in addition, submit an environmental audit reports to the Department within 30 days of completion of the construction phase (i.e. within 30 days of site handover) and a final environmental audit report within 30 days of completion of rehabilitation activities.
23. The environmental audit reports must be compiled in accordance with Appendix 7 of the EIA Regulations, 2014, as amended, and must indicate the date of the audit, the name of the auditor and the outcome of the audit in terms of compliance with the Environmental Authorisation conditions as well as the requirements of the approved EMPr.
24. Records relating to monitoring and auditing must be kept on site and made available for inspection to any relevant and Competent Authority in respect of this development.

Notification to authorities

25. A written notification of commencement must be given to the Department no later than fourteen (14) days prior to the commencement of the activity. Commencement for the purposes of this condition includes site preparation. The notice must include a date on which it is anticipated that the activity will commence, as well as a reference number.

Operation of the activity

26. A written notification of operation must be given to the Department no later than fourteen (14) days prior to the commencement of the activity operational phase.

Site closure and decommissioning

27. 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 administered by any relevant and Competent Authority at that time.

Specific conditions

Conditions for Non-operational aspects

28. You are required to adhere to Eskom's requirements regarding the construction of the proposed project in relation to Eskom's existing infrastructure and demarcation in Eskom's identified property.
29. A 20m buffer must be implemented around the identified Stone Age artefacts, however should these identified Stone Age Artefacts not be possible to avoid during the final route selection for the pylon positions, the holder of the authorisation must conduct a Phase 2 Heritage Impact Assessment (HIA) to document the sites, and a destruction permit from SAHRA must be obtained prior to commencement of construction activities.
30. No exotic plants may be used for rehabilitation purposes. Only indigenous plants of the area may be utilised.
31. The holder of the authorisation is required to inform the Department of Environment and Nature Conservation (DENC), Department of Agriculture, Forestry and Fisheries (DAFF) and this Department should the removal of protected species, medicinal plants and "data deficient" plant species be required and a copy of such permit/s must be submitted to the Department for record keeping.

General

32. A copy of this Environmental Authorisation, the audit and compliance monitoring reports, and the approved EMPr, must be made available for inspection and copying-
- 32.1. at the site of the authorised activity;
- 32.2. to anyone on request; and
- 32.3. where the holder of the Environmental Authorisation has a website, on such publicly accessible website.
33. National government, provincial government, local authorities or committees appointed in terms of the conditions of this authorisation or any other public authority shall not be held responsible for any damages or losses suffered by the holder of the authorisation or his/her successor in title in any instance where construction or operation subsequent to construction be temporarily or permanently stopped for reasons of non-compliance by the holder of the authorisation with the conditions of

authorisation as set out in this document or any other subsequent document emanating from these conditions of authorisation.

Date of Environmental Authorisation: 30/05/2019



Mr Sabelo Malaza

Chief Director: Integrated Environmental Authorisations

Department of Environmental Affairs

Annexure 1: Reasons for Decision

1. Information considered in making the decision

In reaching its decision, the Department took, *inter alia*, the following into consideration -

- a) The information contained in the EIAr dated 29 March 2019;
- b) The comments received from South African Heritage Resources Agency and interested and affected parties as included in the EIAr dated 29 March 2019;
- c) Mitigation measures as proposed in the EIAr dated 29 March 2019 and the EMPr;
- d) The information contained in the specialist studies contained within Appendix D of the EIAr; and
- e) The objectives and requirements of relevant legislation, policies and guidelines, including Section 2 of the National Environmental Management Act, Act No.107 of 1998, as amended.

2. Key factors considered in making the decision

All information presented to the Department was taken into account in the Department's consideration of the application. A summary of the issues which, in the Department's view, were of the most significance is set out below.

- a) The findings of all the specialist studies conducted and their recommended mitigation measures.
- b) The need for the proposed solar facility will contribute electricity to the constrained Northern Cape and National need.
- c) electrical network, contributing to a provincial and national need
- d) The EIAr dated 29 March 2019 identified all legislation and guidelines that have been considered in the preparation of the EIAr dated 29 March 2019.
- e) The methodology used in assessing the potential impacts identified in the EIAr dated 29 March 2019 and the specialist studies have been adequately indicated.
- f) A sufficient public participation process was undertaken and the applicant has satisfied the minimum requirements as prescribed in the EIA Regulations, 2014, as amended, for public involvement.

3. Findings

After consideration of the information and factors listed above, the Department made the following findings -

- a) The identification and assessment of impacts are detailed in the EIAr dated 29 March 2019 and sufficient assessment of the key identified issues and impacts have been completed.
- b) The procedure followed for impact assessment is adequate for the decision-making process.
- c) The proposed mitigation of impacts identified and assessed adequately curtails the identified impacts.
- d) The information contained in the EIAr dated 29 March 2019 is accurate and credible.
- e) EMPr measures for the pre-construction, construction and rehabilitation phases of the development were proposed and included in the EIAr and will be implemented to manage the identified environmental impacts during the construction phase.

In view of the above, the Department is satisfied that, subject to compliance with the conditions contained in the Environmental Authorisation, the authorised activities will not conflict with the general objectives of integrated environmental management laid down in Chapter 5 of the National Environmental Management Act, Act No. 107 of 1998, as amended, and that any potentially detrimental environmental impacts resulting from the authorised activities can be mitigated to acceptable levels. The Environmental Authorisation is accordingly granted.

Annexure 2: Locality Plan

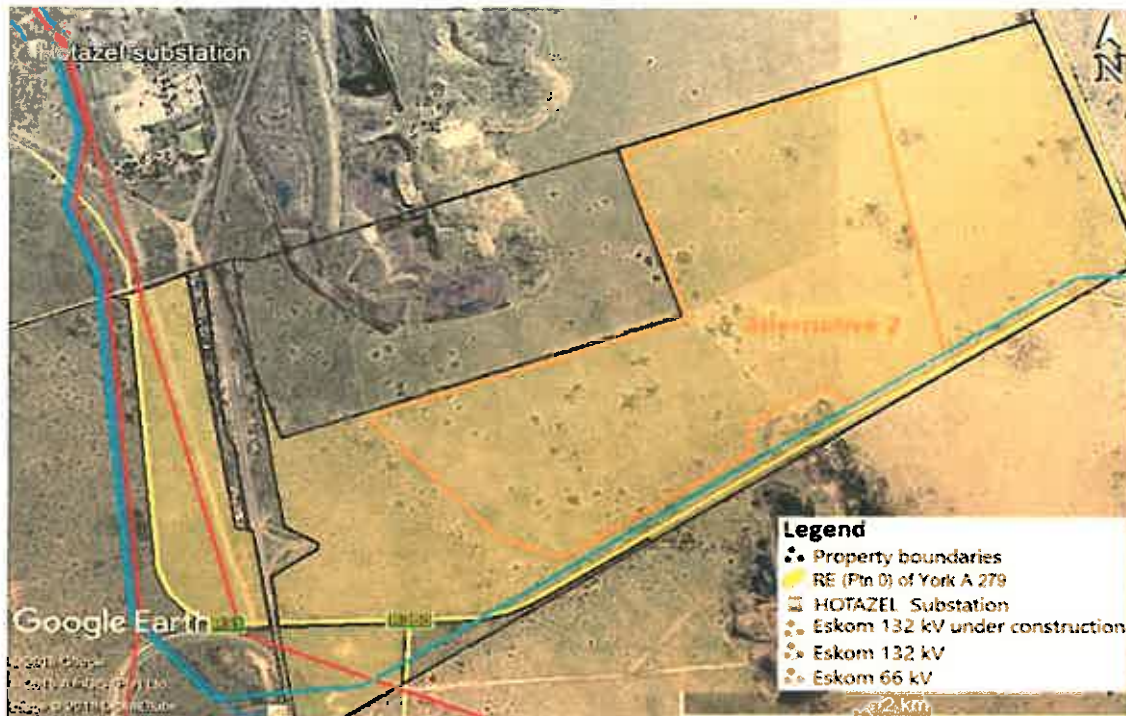


Figure 1: Preferred Layout

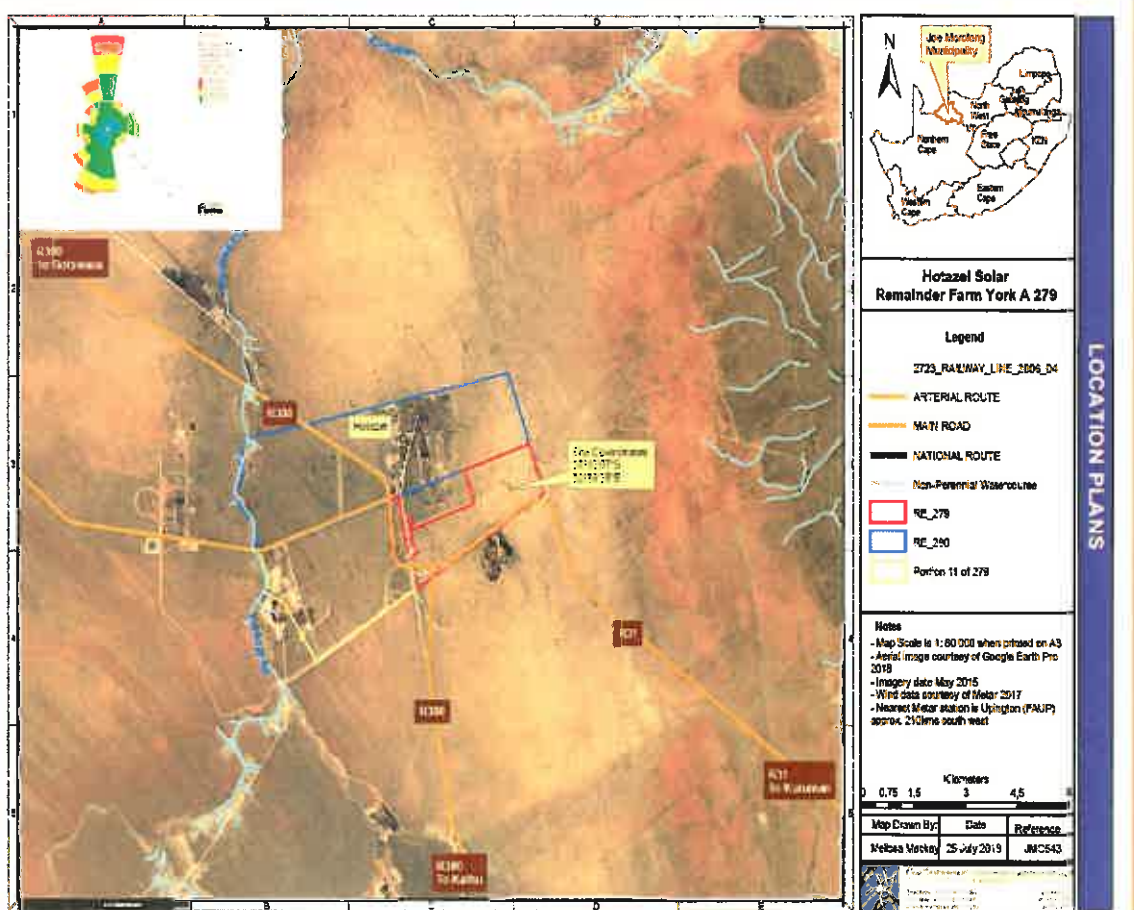


Figure 2: Locality map



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DEFF Reference: 14/12/16/3/3/2/1086

LITHIUM-ION BATTERY ENERGY STORAGE SYSTEM HIGH LEVEL RISK ASSESSMENT FOR THE PROPOSED AMENDMENT OF THE EA FOR THE AUTHORISED HOTAZEL SOLAR ON FARM YORK A NO 279 WITHIN THE JOE MOROLONG LOCAL MUNICIPALITY NEAR HOTAZEL, NORTHERN CAPE PROVINCE.

This risk assessment is appended to the Addendum to the EMPr developed, specifically to incorporate a Battery Energy Storage System within the authorised footprint of the facility. An environmental application process was initiated to amend the EA for the authorised facility and this risk assessment is submitted as part of this environmental process.

1. PROJECT DESCRIPTION

The Hotazel Solar project received an environmental authorisation for a 100 Megawatt PV Energy facility with associated infrastructure on 30 May 2019.

The current amendment process is for the inclusion of a Battery Energy Storage System on a footprint of up to 5ha within the authorised footprint of the development.

2. MOTIVATION

South Africa has recognised the need to expand electricity generation capacity within the country and to improve reliability and resilience of electrical supply. This is based on national policy and informed by ongoing planning undertaken by the Department of Energy (DoE) and the National Energy Regulator of South Africa (NERSA).

The Integrated Resource Plan (IRP 2019) sets the direction for the energy sector, with a shift away from coal, increased adoption of renewables and gas, and an end to the expansion of nuclear power. One of the main challenges faced by Eskom is managing and balancing electricity demand supply. While renewable resources can now achieve lower costs than fossil fuels, photovoltaic (PV) arrays and wind turbines both have variable electricity production, since they rely on energy inputs that cannot be controlled, particularly at peak consumption periods.

Cost reductions of energy storage technologies and the wider deployment of battery, particularly lithium-ion installations globally, have stimulated interest in combining renewable energy generation with energy storage to provide dispatchable energy (energy on demand) and reliable capacity.

Unlike conventional energy storage facilities such as pumped hydro, battery storage has the advantage of being flexible in terms of site location and sizing. They can be easily incorporated into and in close proximity of a wind or solar facility and can be scaled and designed to meet specific needs.

Different battery storage technologies, such as lithium-ion (Li-ion), zinc hybrid cathode, sodium ion, flow (zinc iron or zinc bromine), sodium sulphur (NaS), zinc air and lead acid batteries can be used for grid applications. Compared to other battery options, Li-ion batteries are highly efficient, have a high energy density and are lightweight. As a result of declining costs, Li-ion technology now accounts for more than 90% of battery storage additions globally (IRENA, 2019).

In line with this practise, the applicant is proposing the use of Lithium Battery Technologies, such as Lithium Iron Phosphate (LFP) or Lithium Nickel Manganese Cobalt oxides (NCM).

The proposed Battery Energy Storage System (BESS) is proposed within the approved footprint, adjacent to the on-site substation. It is proposed that the BESS will have a maximum footprint of 6ha.

This will be achieved by consolidating and altering auxiliary footprint areas identified in the approved EA to accommodate the BESS. The approved footprint will not increase in size, nor will the maximum height of infrastructure. As part of this Amendment Application, the revised layout plans (which include the position of the BESS) will be submitted to the department.

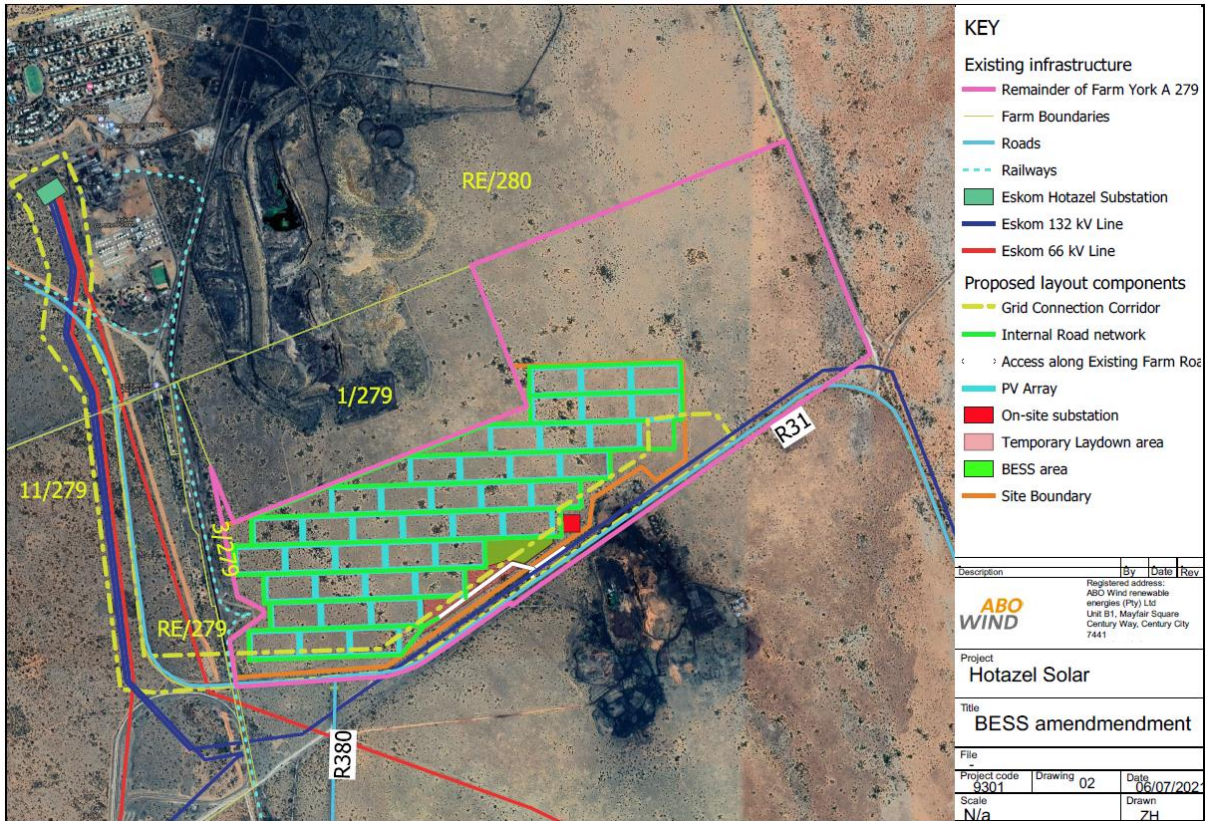
The exact design specifications will depend on the battery manufacturer, however traditional utility scale Li-ion battery storage facility include the following main components:

1. Battery cells → modules → packs → racking system (DC)
2. Storage container (HVAC system, thermal management, monitors and controls, fire suppression, switchgear and energy management system).
3. Power conversion system (bidirectional inverter to convert AC to DC for battery charging and DC to AC for discharging).
4. Transformer to step up 480-V inverter output to 12-66kV.

The inclusion of a BESS into renewable energy facilities is an important step in securing peak demand energy in South Africa. It falls in line with all the relevant policies and programmes that are driving renewable energy development.

3. LAYOUT PLAN SHOWING BESS

The plan below shows the location of the BESS in relation to the authorised footprint of the facility.



As can be seen above, the proposed BESS is situated along the Southern Boundary of the approved footprint, adjacent to the on-site substation and laydown area. The full-sized layout plans are appended to the Amendment Assessment Report and application for amendment form.

4. RISK ASSESSMENT

The risks associated with lithium-ion (Li-ion) battery technologies are generally well understood and researched. The primary risks relate to fire hazards and the potential for a condition known as ‘thermal runaway’. Thermal runaway occurs in situations where an increase in temperature changes the conditions in a way that causes a further increase in temperature, often leading to a destructive result.

In terms of general environmental risks, these have been identified as the mining for the materials used in batteries and the disposal at end of life. This report does not address any impacts associated with the mining of lithium for the production of Li-ion batteries but is only concerned with the risks associated with onsite use of battery energy storage systems (BESS) for PV facilities.

This probability risk assessment is based on four main principles (questions that need answering):

1. What could go wrong? In other words what are the actual risks (column 1 and 2).
2. What is the likelihood of something going wrong? In other words, how likely is it that the identified risks could occur (column 3).
3. How bad would it be if something went wrong? In other words, what would the actual impact be should one of the identified risks take place (column 4).
4. What additional management actions and/or mitigations need to be in place to reduce the risk and limit the impact of the risk (column 5).

| Risk / Impact | Discussion | Likelihood of Risk | Impact of risk | Management / Mitigation |
|---|------------|--------------------|----------------|-------------------------|
| BESS component / equipment risks | | | | |

| Risk / Impact | Discussion | Likelihood of Risk | Impact of risk | Management / Mitigation |
|-------------------------------|---|--------------------|---|---|
| Mishandling | <p>Considering that a battery is a source of energy, there is a danger that should it be punctured, incinerated, crushed, immersed, have a forced discharge or exposed to temperatures above the declared operating temperature range of the product, there is a risk that an internal or external short circuit may occur. An internal or external short circuit can cause significant overheating which in some cases could result in fire, that could affect surrounding materials or materials within the cell or battery.</p> | Low | <p>Electrocution. On site fires. Electrical failure. Potential spillage of electrolytes (very low likelihood with lithium batteries).</p> | <p>Training and well managed operations and maintenance. Under normal conditions of use, the electrode materials and electrolyte they contain are not exposed, provided the battery integrity is maintained and seals remain intact. Risk of exposure may occur only in cases of abuse (mechanical, thermal, electrical).</p> |
| Mechanical Damage | <p>If batteries are not properly stored when not in use prior to installation, there is a possibility that mechanical damage may occur leading to:</p> <ul style="list-style-type: none"> • Leaked battery pack coolant • Leaked refrigerant • Leaked cell electrolyte • Rapid heating of individual cells due to exothermic reaction of constituent materials (cell thermal runaway), venting of cells, and propagation of self-heating and thermal runaway reactions to neighbouring cells. • Fire | Low | <p>On site fires. Electrical failure. Potential spillage of electrolytes or refrigerant.</p> | <p>Adequate on-site management during the construction and operations and maintenance periods.</p> |
| Leaked Coolant or Refrigerant | <p>Thermal management of some Li-ion battery packs is achieved via liquid cooling using coolant or refrigerant products. Mechanical damage of a battery pack that has been installed could result in leakage of the coolant. The fluid is generally blue in colour and does not emit a strong odour. This coolant if released has toxicological hazards and ecological effects as well as additional impacts relating to the disposal of leaked fluids.</p> <p>Additionally, extended exposure of the battery system to leaked coolant could cause additional damage to the product such as corrosion and compromising of protection electronics.</p> | Low | <p>Potential spillage of electrolytes. Ecological damage. Electrical failure.</p> | <p>Maintenance. Source from reputable manufacturers. Safe and appropriate storage. Safe handling which must include battery inspection prior to installation.</p> |
| Vented Electrolyte | <p>Li-ion cells are sealed units, and thus under normal usage</p> | Low | <p>On site fires.</p> | <p>Maintenance.</p> |

| Risk / Impact | Discussion | Likelihood of Risk | Impact of risk | Management / Mitigation |
|---|--|--------------------|---|--|
| | <p>conditions, venting of electrolyte should not occur. If subjected to abnormal heating or other abuse conditions, electrolyte and electrolyte decomposition products can vaporize and be vented from cells. Accumulation of liquid electrolyte is unlikely in the case of abnormal heating. Vented gases are a common early indicator of a thermal runaway reaction – an abnormal and hazardous condition.</p> | | <p>Electrical failure. Vent gases.</p> | <p>Source from reputable manufacturers. Safe and appropriate storage. Safe handling which must include battery inspection prior to installation.</p> |
| <p>Thermal Runaway (TR)</p> | <p>Li-ion battery thermal runaway occurs when a cell, or area within the cell, achieves elevated temperatures due to thermal failure, mechanical failure, internal/external short circuiting and electrochemical abuse. At elevated temperatures, exothermic decomposition of the cell materials begins. Eventually, the self-heating rate of the cell is greater than the rate at which heat can be dissipated to the surroundings, the cell temperature rises exponentially, and stability is ultimately lost. The loss in stability results in all remaining thermal and electrochemical energy being released to the surroundings.</p> <p>It's widely accepted that most TRs are caused by mechanical, electrical or thermal abuses.</p> | <p>Low</p> | <p>On site fires. Electrical failure. Potential spillage of electrolytes.</p> | <p>Maintenance. Despite various factors that may lead to TR, materials including electrode materials as well as electrolytes, and battery design such as negative/positive capacity ratio and venting control, to name but a few, are the intrinsic approaches to enhance the battery safety. Source from reputable manufacturers. Safe and appropriate storage. Safe handling which must include battery inspection prior to installation. Development and implementation of Thermal Management Plan.</p> |
| <p>Limited knowledge and experience of First Responders to deal with emergency incidents.</p> | <p>As this technology is relatively new in a South African context, the first responders in an unlikely event of an incident may not have the necessary knowledge or experience to deal with an emergency situation such as fire or leakage.</p> | <p>Low</p> | <p>Fire. Electrocution. Injury. Inability to contain spillage.</p> | <p>During the construction phase of the project, first responders from the nearest major centre (such as fire fighters and paramedics) must be given appropriate training on dealing with any emergency situation that may occur as a result of the BESS. Such training must be provided by the technology suppliers or an appointed service provider. Appropriate warnings and Standard Operating</p> |

| Risk / Impact | Discussion | Likelihood of Risk | Impact of risk | Management / Mitigation |
|--|---|--------------------|---|--|
| | | | | Procedure for emergency events must be developed and must be provided to the local emergency services and the O&M staff on site. |
| Disposal at end of life | <p>Disposal of Li-ion batteries to landfill is problematic and recycling should be prioritised. Research in Australia found that just 2% of the country's 3,300 tonnes of Li-ion waste is recycled. South Africa fares far worse (as of November 2019, there was no Li-ion battery recycling facility in South Africa (eWASA)) and Li-ion batteries along with significant amounts of e-waste are not properly disposed of or sent for recycling. In addition to the lithium, manufacturers are secretive about what actually goes into their batteries, which makes it harder to recycle them properly. And while lithium itself isn't of great concern from a pollution angle, these batteries do contain metals like cobalt, nickel, and manganese.</p> <p>The potentially toxic materials contained in batteries means that they are classified as hazardous materials in terms of NEM:WA. There are only a few licensed hazardous waste sites in South Africa and recycling of batteries and e-waste has been identified as a sure way of improving the lifespans of such sites.</p> | High | <p>Potential scenario of fluids from the batteries leaking into environment.</p> <p>The release of such chemicals through leaching, spills or air emissions can harm communities, ecosystems and food production.</p> | <p>Recovery of metals at end of life can significantly reduce these life cycle impacts. This is because the extraction and processing of virgin materials are key contributors to impacts for all battery chemistries.</p> <p>Prior to commencement of the activity, a dedicated Battery Recycling Programme must be compiled and adopted.</p> |
| General Environmental Risks | | | | |
| Hydrocarbon Spillage | The BESS area will contain transformers which contain oil for cooling (unless air-cooled). Temporary fuel storage will take place during the construction phase. | Low | Contamination of land and adjacent water resources. | Implementation of the Management actions already included in the EMPr. |
| Physical damage to surrounding natural areas | Construction activities if not properly managed could impact on areas outside of the construction footprint. | Medium | Physical damage to habitat. | Implementation of the Management actions already included in the EMPr particularly in relation to the demarcation of no-go areas. |
| Impact on species of | The transformation of habitat associated with the BESS, may | Medium | Loss of individual plants within the | Implementation of the Management actions |

| Risk / Impact | Discussion | Likelihood of Risk | Impact of risk | Management / Mitigation |
|--|---|--------------------|--|--|
| conservation concern | have a direct impact on species of conservation concern. | | footprint of the BESS. | already included in the EMPr. Compliance with the conditions of the Threatened or protected species (TOPS) permits. Undertaking plant rescue in compliance with the plant rescue and protection plan. |
| Concrete contamination | Run off from concrete civil works could contaminate surrounding areas. | Low | Contamination of land and surrounding water resources. | Implementation of the Management actions already included in the EMPr. Use of ready-mix concrete and the limitation of on-site batching. |
| Dust | Dust fall out from construction activities. | Medium | Health and safety impacts. Impacts on surrounding vegetation. | Implementation of the Management actions already included in the EMPr. Implementation of a dust fall out monitoring programme. |
| Protection of Archaeological Resources | Subterranean resources could be exposed during excavations. | Low | Loss of archaeological resources. | Implementation of the Management actions already included in the EMPr. ECO Inspection of all excavations. Compliance with requirements of SAHRA authorisation. |
| Loss of topsoil resources | All construction activities will have the possibility to impact on topsoil resources. | Low | Loss of Topsoil Contamination of Topsoil. | Implementation of the Management actions already included in the EMPr particularly with regard to topsoil handling and the stripping and stockpiling of topsoil from the BESS footprint prior to construction. |

| Risk / Impact | Discussion | Likelihood of Risk | Impact of risk | Management / Mitigation |
|------------------------|--|--------------------|--|--|
| Noise Impact | Although the proposed development is located outside of an urban area, construction noise could have an impact on sensitive receptors. | Low | Impact on health and safety of construction staff. Impact on displacement of fauna. | Implementation of the Management actions already included in the EMPr and 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). |
| Siltation and erosion | Stormwater and wash water have the potential to cause erosion or pollution of the receiving environment. | Low | Contamination of surrounding land. Impact on water Quality. | Implementation of the Management actions already included in the EMPr. Implementation of the Stormwater Management Plan. |
| Theft and other crime. | An increase in crime during the construction phase is often a concern during the development of the overall facility, including the BESS. This is likely to be negligible due to the extremely remote nature of the site. | Low | On site theft. Theft at surrounding properties. | Implementation of the Management actions already included in the EMPr. Implementation of a site security plan. |
| Wildfires | The solar development site including the BESS 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 very high rainfall, sufficient biomass may build up to carry fires. | Low | Damage to infrastructure. | Implementation of the Management actions already included in the EMPr. Maintaining a firebreak around the total project footprint in the form of a perimeter road. |

5. CONCLUSION

A comprehensive operations and maintenance programme is necessary to ensure that all management and mitigation measures listed above and included in the revised EMPr are adopted and implemented as well as to ensure that all monitoring and protective devices are in good working order.

Regular inspections should be undertaken to ensure the battery systems are not overheating or showing signs of malfunction. Annual thermographic scanning can help ensure the BESS is operating within normal parameters.

This high-level risk assessment must be replaced with a detailed technology specific risk assessment once the final equipment suppliers have been identified during the detailed design and procurement stage.