



ecodriven



Du Plessis Solar PV 4

Section 54 A (3) Desktop Environmental External Audit
Report

December 2019

Prepared for:



MULILO
RENEWABLE PROJECT DEVELOPMENTS

Mulilo Renewable Project Developments (Pty)Ltd
Top Floor Golf Park 4 Raapenberg Rd Mowbray 7700
PO Box 548 Howard Place 7450

Project Details

Document Title: Du Plessis Solar PV 4 Section 54 A (3) Desktop Environmental External Audit Report

DEA Reference No: 12/12/20/2498

Project Location: Remainder of the Farm Du Plessis Dam 179 near the eastern border of the town of De Aar, Northern Cape Province

Report Revision: Final

Author(s): EcoDriven Environmental Services
Mr. Charles Lubbe

Reviewer(s): Adv. Fef Le Roux SC

Client: Mulilo Renewable Project Developments (Pty)Ltd
Andrew Pearson

Date: December 2019

Project Team Expertise and Declaration of Independence

Charles Lubbe – EcoDriven Manager and Principal Environmental Consultant (9 years' experience as an EAP)

Charles graduated at Cape Peninsula University of Technology with a National Diploma and BTech Degree in Environmental Management. He started his career in 2009 as a Junior Environmental Consultant at DJ Environmental Consultants (DJEC) and was in 2011 promoted to Senior Environmental Consultant at the same company. In 2013, DJEC opened a provincial office in the Northern Cape Province and Charles was appointed to run the office as the Provincial Manager. In 2016, Charles joined Savannah Environmental where he served in various capacities as Environmental Assessment Practitioner, Environmental Control Officer and Environmental Office Manager until March 2018. He was appointed as EcoDriven's Manager and Principal Consultant with effect from 1 April 2018. His environmental experience covers nine years dealing with various projects across a spectrum ranging from renewable energy projects (Photovoltaic, Concentrated Solar Power and Wind Farms), residential development projects (Private sector and Government sector) and mining sector (open cast mining). His role in the abovementioned sectors, includes the planning and design phases, construction phases and operational phases, allowing him to have a full understanding of the complete life cycle of any given environmental project.

I, **Charles Lubbe**, as an independent consultant compiled this audit report and declare that it correctly reflects the findings made at the time of the audit. I further declare that I:

- » Act as an independent consultant;
- » Do not have any financial interest in the undertaking of the activity, other than remuneration for the work performed in terms of the National Environmental Management Act, 1998 (Act 107 of 1998);
- » Undertake to disclose, to the competent authority, any material information that has or may have the potential to influence the decision of the competent authority or the objectivity of any report, plan or document required in terms of the National Environmental Management Act, 1998 (Act 107 of 1998);
- » Based on information provided to me by the project developer and in addition to information obtained during the course of this audit, present the results and conclusion within the associated document to the best of my professional judgement.

Adv. Fef Le Roux SC - Chairman of the Board of Directors, Senior Environmental Consultant.

Fef has 37 years' experience as a practising lawyer, initially, until 2012, mostly on environmentally related matters and since then as founder of and senior environmental consultant and legal advisor with EcoDriven. He graduated at Stellenbosch University in 1975 with a B.A. Law and LLB degrees and then qualified himself as an attorney, conveyancer and notary of the High Court of South Africa. In 1981, he joined the Cape Bar, where he practised as an advocate until his retirement from his practice in June 2012. He was awarded Senior Counsel status by President Nelson Mandela in 1996. Throughout his career as an advocate, he focused on environmentally related fields of law with a special interest in water law. His interest in the environment led him to establish the Academy for Environmental Leadership (AEL) in 2015 (www.afel.co.za) with EcoDriven as its Environmental Services Division. In addition to his role as chairman of AEL, he is responsible for lecturing the module Environmental Legislative Framework, covering a practical introduction to the full spectrum of environmental legislation.

TABLE OF CONTENTS

| | |
|--|-----------|
| TABLE OF CONTENTS | 4 |
| 1. INTRODUCTION | 6 |
| 2. SCOPE AND PURPOSE | 7 |
| 3. AUDIT METHODOLOGY | 7 |
| 4. ASSUMPTION AND LIMITATIONS | 9 |
| 5. AUDIT FINDINGS | 9 |
| 5.1 Environmental Management Programme - Results | 9 |
| 5.1.1 Description of environmental non-conformities under the EMPR. | 10 |
| 5.2 Environmental Authorisation - Results | 10 |
| 5.2.1 Description of environmental non-conformities under the EA. | 10 |
| 6. CONCLUSION AND RECOMMENDATIONS | 10 |

LIST OF TABLES:

| | |
|--|----------|
| Table 1: Compliance Scoring | 8 |
|--|----------|

APPENDICES**Appendix A:** Environmental Authorisations Checklists**Appendix B:** Environmental Management Programme Checklists**LIST OF ACRONYMS AND ABBREVIATIONS**

| | |
|---------------|--|
| DEA | Department of Environmental Affairs |
| DAFF | Department of Agriculture Forestry and Fisheries |
| DENC | Department of Environment and Nature Conservation |
| NCDENC | Northern Cape Department of Environment and Nature Conservation |
| DWS | Department of Water and Sanitation |
| EA | Environmental Authorisation |
| ECO | Environmental Control Officer |
| EMPr | Environmental Management Programme |
| EO | Environmental Officer |
| REIPPP | Renewable Energy Independent Power Producer Procurement Programme |
| NCR | Non-Compliance Report |
| NEMA | National Environmental Management Act |
| OPL | Overhead Power Line |
| PV | Photovoltaic |
| WUL | Water Use License |

1. INTRODUCTION

EcoDriven Environmental Services was appointed by Mulilo Renewable Project Developments (Pty)Ltd (*Developer*) to conduct an independent external environmental compliance audit on the project EA and approved EMPr as required under section 54 A (3) of the Amended EIA regulations 2014. The project type consists of 19.9 MW photovoltaic solar energy facility and will comprise the following:

Associated infrastructure for the PV facility includes:

- **Powerline:** A 132 kV line (3 km in length) to be connected to the De Aar Substation. The voltage of the line will most likely be 132 kV, but could be reduced to 22 kV depending on the available capacity.
- **Storm water:** Storm water infrastructure such as concrete channels to manage the on-site runoff and to direct the flow of storm water.
- **Access roads:** Access road of 1.5 km in length which will connect the site to Arend Street.
- **Internal access:** Internal access routes to link key inverter houses and the solar arrays with roads of between 2m and 4m in width.
- **Substation:** The distribution substation which is approximately 50m x 50m in size.
- **Buildings:** Connection centre building: 2.5m x 2.55m; Control centre: 6m x 10m x 2.55m (HxWxL); Guard cabin / offices; and an electrical sub-station.
- **Solar resource measuring station:** Resource measuring stations providing remote monitoring and feedback of the plant performance.
- **Fencing:** An electrified fence of ± 2.9 m height.

The project is currently in the planning and pre-construction phase and none of the construction activities has yet commenced. The PV facility received its EA on 28 September 2012 and no amendments have been applied for since. **An overall compliance score of 100% was achieved for the planning and pre-construction specifications from the approved EMPr. Compliance with the EA (facility) planning and pre-construction specifications was also scored at 100%.**

2. SCOPE AND PURPOSE

Section 54 A (3) of the Amended NEMA EIA regulations 2014 states: “*Where an environmental authorisation issued in terms of the ECA regulations or the previous NEMA regulations is still in effect by 8 December 2014, the EMPr associated with such environmental authorisation is subject to the requirements contained in Part 3 of Chapter 5 of these Regulations and the first environmental audit report must be submitted to the competent authority no later than 7 December 2019 and at least 5 years thereafter for the period during which such environmental authorisation is still in effect.*” This audit was triggered by the abovementioned regulation requirement and the purpose of it was to determine compliance with the planning and pre-construction requirements of the project EA and approved EMPr.

Section 34 of the Amended NEMA EIA regulations 2014 requires that the audit report be prepared by an independent person and must contain all the information required in Appendix 7 of the regulation. This audit report complies with the requirements under Appendix 7 of the Amended NEMA EIA regulations 2014 and contains the content as required under subsection 3 of Appendix 7. Refer to the Project Team Expertise and Declaration of Independence section above for the declaration of independence statement of the auditor.

This report provides a summary of the external audit findings and provides recommendations that will assist the developer to avoid and rectify any environmental non-conformities identified during the audit.

3. AUDIT METHODOLOGY

The project is currently in the planning and pre-construction phase and as a result, the audit methodology consists of a desktop assessment against the existing applicable verifiable project EA and EMPr conditions.

The following auditing tools were used to gather information:

- Documentation review;
- Compilation of audit checklist/questionnaire
- Drafting of Environmental Audit Report

An audit checklist was compiled on **25 November 2019** by extracting relevant presently existing verifiable conditions from the EA and EMPr. Conformance scores, based on the level of compliance for the overall site, are allocated to each audit item/condition on the checklist. These are presented in **Table 1**. An overall compliance is derived, based on the following:

- » Number of items scored for the audit event;
- » The highest conformance score for the audit event;
- » The actual conformance score for the audit event; and
- » Total Conformance Score.

Table 1: Compliance Scoring

| Conformance Score (Scale from 0 to 3): | Rating of Conformances Scores: |
|--|--|
| 0 | A score of 0 indicates a <i>Major Non-Compliance</i> and relates to the absence of a requirement to be implemented or the total breakdown of a process. A number of minor non-compliances listed against the same requirement may represent a total breakdown of a process and thus could collectively be a major non-compliance. |
| 1 | A score of 1 indicates a <i>Minor non-compliance</i> and the requirement is partially implemented or non-compliant. |
| 2 | A score of 2 constitutes a <i>deviation</i> and relates to a matter about which the assessor is concerned but which cannot be clearly stated as non-compliance. <i>Deviations</i> also indicate trends which may result in a future non-compliance. |
| 3 | A score of 3 indicates <i>Compliance</i> with the project management plans and procedures that are executed in a |

| Conformance Score (Scale from 0 to 3): | Rating of Conformances Scores: |
|---|--|
| | managed fashion (planned, tracked, verified and adjusted) based upon defined activities, inputs and outputs. Objective evidence is available for each process. |

4. ASSUMPTION AND LIMITATIONS

The audit findings are based on a desktop compliance assessment of the relevant presently existing verifiable planning and pre-construction requirements. No site visit was conducted as the developer advised the auditor that the construction phase of the project has not yet commenced. The findings are relevant to a specific phase of the project and as a result, changing circumstances throughout the life-time and progress of the project planning and pre-construction phase may differ and deliver different results. None of the construction conditions has been assessed during this audit.

5. AUDIT FINDINGS

An overall compliance score of 100% was achieved for the planning and pre-construction specifications from the approved EMPr. Compliance with the EA (facility) planning and pre-construction specifications was also scored at 100%.

5.1 Environmental Management Programme - Results

A combined checklist was derived from the specifications of the EMPr (refer to Appendix B). The percentage compliance scores in Appendix B have been calculated at the end of audit. These percentage scores have been calculated without weighing any issues (i.e. all environmental specifications have the same weight).

5.1.1 Description of environmental non-conformities under the EMPR.

No non-conformities have been identified against the project EMPr. Majority of the planning and pre-construction environmental specifications in the EMPr was identified as not applicable (n/a) at this stage of the project. The developer advised on most of the n/a specifications that should the project be selected as a preferred bidder in the REIPPP process, then the relevant requirement will be implemented accordingly.

5.2 Environmental Authorisation - Results

A checklist was derived from the conditions of the project EA (please refer to Appendix A). The percentage compliance scores in Appendix A have been calculated at the end of audit.

5.2.1 Description of environmental non-conformities under the EA.

No non-conformities have been identified against the project EA. Majority of the planning and pre-construction environmental specifications in the EA was identified as not applicable (n/a) at this stage of the project. The developer advised on most of the n/a specifications that should the project be selected as a preferred bidder in the REIPPP process, then the relevant requirement will be implemented accordingly.

6. CONCLUSION AND RECOMMENDATIONS

An overall compliance score of 100% was achieved for the planning and pre-construction specifications from the approved EMPr. Compliance with the EA (facility) planning and pre-construction specifications was also scored at 100%.

Overall, it was found that the facility is designed in an environmentally friendly manner. The audit revealed that environmental aspects as a whole are considered. It is imperative that the developer takes full cognisance of the requirements of the EA and EMPr to ensure that all planning and pre-construction requirements are addressed and implemented before the construction phase commences.

APPENDIX A
ENVIRONMENTAL AUTHORISATION CHECKLIST

3 POINT RATING SCALE



Not compliant

Compliant

- 3 - full compliance
- 2 - partial compliance (viz >50% compliance)
- 1 - Insufficient compliance (viz <50% compliance)
- 0 - nothing in place
- N/A - not applicable

The total score, average score and percentage compliance for each aspect of all elements is calculated.

ENVIRONMENTAL AUTHORISATION CHECKLIST FOR THE DU PLESSIS SOLAR PV 4, NORTHERN CAPE

| | | |
|---|---|---|
|  | Client name: Mulilo Renewable Project Developments (Pty)Ltd Athorisation Holder: Du Plessis Solar PV4 (Pty) Ltd Project name: Du Plessis Solar PV4 Authorisation registered number: 12/12/20/2498 Date issued: 28/09/2012 Last Amended: 03/05/2017 Environmental Auditor: Charles Lubbe (Principal EAP) Audit date: 25/11/2019 |  |
|---|---|---|

SCOPE OF AUTHORISATION

| Number | Environmental Condition | Permit Type | Compliant | Not Compliant | Rating | Owner and Auditor Comment |
|--------|---|-------------|-----------|---------------|--------|---|
| 1 | The preferred site (Site Alternative 1, Transmission line Alternative 1 (T1.1) and the preferred access) are approved. | | | | N/A | The owner takes not of this condition |
| 2 | Authorisation of the activity is subject to the conditions contained in this authorisation, which form part of the environmental authorisation and are binding on the holder of the authorisation. | | | | N/A | The owner takes not of this condition |
| 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. | | ✓ | | 3 | The Mulilo Environmental Manager is currently responsible for ensuring compliance with the conditions contained in this environmental authorisation |
| 4 | The activities authorised may only be carried out at the property as described above. | | | | N/A | The owner takes not of this condition |
| 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 environmental authorisation to apply for further environmental authorisation in terms of the regulations. | | ✓ | | 3 | No changes have been made to the approved plan and project description |
| 6 | This activity must commence within a period of three (3) years from the date of expiry of the EA issued on September 2012, which was then extended to 28 September 2017 (i.e. EA lapses on September 2020). 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. | | ✓ | | 3 | The project is still valid under the amended condition and the EA only lapses on 28/09/2020 |
| 7 | Commencement with one activity listed in terms of this environmental authorisation constitutes commencement of all authorised activities. | | | | N/A | The owner takes not of this condition |
| 8 | The holder of an environmental authorisation must apply for an amendment of 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. | | ✓ | | 3 | The owner contact details was amended on 03/05/2017 |

NOTIFICATION OF AUTHORISATION & RIGHT TO APPEAL

| | | | | | | |
|---|---|--|---|--|---|---|
| 9 | The holder of the authorisation must notify every registered interested and affected party, in writing and within 12 (twelve) calendar days of the date of this environmental authorisation, of the decision to authorise the activity. | | ✓ | | 3 | The authorisation was issued on 28/09/2012 and all I&APs was notified on 02/10/2012 |
|---|---|--|---|--|---|---|



Client name: Mulilo Renewable Project Developments (Pty)Ltd
Athorisation Holder: Du Plessis Solar PV4 (Pty) Ltd
Project name: Du Plessis Solar PV4
Authorisation registered number: 12/12/20/2498
Date issued: 28/09/2012
Last Amended: 03/05/2017
Environmental Auditor: Charles Lubbe (Principal EAP)
Audit date: 25/11/2019



SCOPE OF AUTHORISATION

| | | | | | | |
|----|---|--|---|--|---|----------------------------------|
| 10 | The notification referred to must — 10.1. specify the date on which the environmental authorisation was issued; 10.2. inform the interested and affected party of the appeal procedure provided for in Chapter 7 of the Environmental Impact Assessment Regulations, 2010; 10.3. advise the interested and affected party that a copy of the environmental authorisation will be furnished on request; and 10.4. give the reasons of the competent authority for the decision. | | ✓ | | 3 | All requirements were adhered to |
| 11 | The holder of the authorisation must publish a notice — 11.1. informing interested and affected parties of the decision; 11.2. informing interested and affected parties where the decision can be accessed; and 11.3. drawing the attention of interested and affected parties to the fact that an appeal may be lodged against this decision in the newspaper(s) contemplated and used in terms of regulation 54(2)(c) and (d) and which newspaper was used for the placing of advertisements as part of the public participation process. | | ✓ | | 3 | All requirements were adhered to |

MANAGEMENT OF ACTIVITY

| | | | | | | |
|----|--|--|---|--|-----|---|
| 12 | A copy of the final site layout plan must be submitted to the Department for written approval prior to commencement of the activity. All available biodiversity information must be used in the finalisation of the layout plan. Existing infrastructure must be used as far as possible e.g. roads. The layout plan must indicate the following: 12.1 Position of solar facilities and its associated infrastructure; 12.2 Foundation footprint; 12.3 Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting on sections possible); 12.4 Wetlands, drainage lines, rivers, stream and water crossing of roads and cables indicating the type of bridging structures that will be used; 12.5 All sensitive features e.g. heritage sites, wetlands and drainage channels that will be affected by the facility and associated infrastructure; 12.6 Sub-station(s) and/or transformer(s) sites including their entire footprint; 12.7 Connection routes (including pylon positions) to the distribution/transmission network; 12.8 All existing infrastructure on the site, especially roads; 12.9 Buildings, including accommodation; and 12.10 All "no-go" and buffer areas. | | ✓ | | 3 | The final EMPr and site layout plan was authorised on 22/06/2016 |
| 13 | The Environmental Management Programme (EMPr) submitted as part of the Amended BAR dated August 2012 must be amended to include measures as dictated by the final site lay-out plan and micro-siting; and the provisions of this environmental authorisation. The EMPr must be submitted to the Department for written approval prior to commencement of the activity. Once approved the EMPr must be implemented and adhered to. | | ✓ | | 3 | The final EMPr and site layout plan was authorised on 22/06/2017 |
| 14 | The EMPr is amendable and must be implemented and strictly enforced during all phases of the project. It shall be seen as a dynamic document and shall be included in all contract documentation for all phases of the development when approved. | | ✓ | | 3 | All EMPr planning and pre-construction requirements are adhered to. |
| 15 | Changes to the EMPr, which are environmentally defensible, shall be submitted to this Department for acceptance before such changes could be effected. | | | | N/A | The owner takes not of this condition |
| 16 | The Department reserves the right to amend the EMPr should any impacts that were not anticipated or covered in the Amended Bar dated August 2012 be discovered. | | | | N/A | The owner takes not of this condition |



Client name: Mulilo Renewable Project Developments (Pty)Ltd
Athorisation Holder: Du Plessis Solar PV4 (Pty) Ltd
Project name: Du Plessis Solar PV4
Authorisation registered number: 12/12/20/2498
Date issued: 28/09/2012
Last Amended: 03/05/2017
Environmental Auditor: Charles Lubbe (Principal EAP)
Audit date: 25/11/2019



SCOPE OF AUTHORISATION

| | | | | | | |
|----|---|---|--|--|-----|---|
| 17 | The provisions of the approved EMPr including recommendations and mitigation measures in the Amended Bar dated August 2012 and specialist' studies shall be an extension of the conditions of this EA and therefore noncompliance with them would constitute noncompliance with the EA. | | | | N/A | The owner takes not of this condition |
| 18 | The EMPr amendment must include the following: | | | | | |
| | 18.1 All recommendations and mitigation measures recorded in the Amended BAR dated August 2012. | ✓ | | | 3 | |
| | 18.2 The requirements and conditions of this authorisation. | ✓ | | | 3 | |
| | 18.3 The final site layout plan. | ✓ | | | 3 | The final approved site layout plan was included in the EMPr as Appendix 1 |
| | 18.4 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. | ✓ | | | 3 | An Invasive Alien Management Plan dated 5 February 2016 was in place. |
| | 18.5 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. | ✓ | | | 3 | A Flora Search and Rescue Management Plan dated 5 February was in place. |
| | 18.6 A re-vegetation and habitat rehabilitation plan to be implemented during the construction and operation of the facility. Restoration must be undertaken as soon as possible after completion of construction activities to reduce the amount of habitat converted at any one time and to speed up the recovery to natural habitation. | ✓ | | | 3 | A Flora Rehabilitation Management Plan dated 5 February was in place. |
| | 18.7 A traffic management plan for the site access roads to ensure that no hazards would results from the increased truck traffic and that traffic flow would not be adversely impacted. This plan must include measures to minimize impacts on local commuters e.g. limiting construction vehicles travelling on public roadways during the morning and late afternoon commute time and avoid using roads through densely populated built-up areas so as not to disturb existing retail and commercial operations. | ✓ | | | 3 | A Traffic Management Plan dated 9 February was in place. |
| | 18.8 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. | ✓ | | | 3 | A Stormwater Management Plan dated 8 February was in place. |
| | 18.9 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. | ✓ | | | 3 | An Erosion Management Plan was included in the EMPr as Appendix 7. |
| | 18.10 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. | | | | N/A | Will be verified during the construction phase |
| | 18.11 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. | | | | N/A | Will be verified during the construction phase |
| | 18.12 An environmental sensitivity map indicating environmental sensitive areas and features identified during the EIA process. | ✓ | | | 3 | An Environmental Sensitivity Map was included in the EMPr as Appendix 8. |
| | 18.13 A map combining the final layout plan superimposed on the environmental sensitivity map. | ✓ | | | 3 | A Final Site Layout superimposed on Sensitivity map was included in the EMPr as Appendix 9. |



Client name: Mulilo Renewable Project Developments (Pty)Ltd
Athorisation Holder: Du Plessis Solar PV4 (Pty) Ltd
Project name: Du Plessis Solar PV4
Authorisation registered number: 12/12/20/2498
Date issued: 28/09/2012
Last Amended: 03/05/2017
Environmental Auditor: Charles Lubbe (Principal EAP)
Audit date: 25/11/2019



SCOPE OF AUTHORISATION

ENVIRONMENTAL CONTROL OFFICER (ECO) DUTIES

| | | | | | | |
|----|---|--|--|--|-----|--|
| 19 | The holder of this authorisation must appoint a suitably experienced independent Environmental Control Officer (ECO) for the construction phase of the development that will have the responsibility to ensure that the conditions referred to in this authorisation are implemented and to ensure compliance with the provisions of the EMPr. | | | | N/A | The owner takes not of this condition, The ECO will be appointed prior to the commencement of the construction phase |
| 20 | The ECO must be appointed before commencement of any authorised activity. | | | | N/A | The owner takes not of this condition, The ECO will be appointed prior to the commencement of the construction phase |
| 21 | Once appointed, the name and contact details of the ECO must be submitted to the Director: Compliance Monitoring of this Department. | | | | N/A | The owner takes not of this condition, The ECO will be appointed prior to the commencement of the construction phase |
| 22 | 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. | | | | N/A | The owner takes not of this condition |
| 23 | <p>The ECO must:</p> <p>23.1 Keep record of all activities on site, problems identified, transgressions noted and a schedule of tasks undertaken by the ECO.</p> <p>23.2 Keep and maintain a detailed incident (including spillage of bitumen, fuels, chemicals, or any other material) and complaint register on site indicating how these issues were addressed, what rehabilitation measures were taken and what preventative measures were implemented to avoid re-occurrence of incidents/complaints.</p> <p>23.3 Keep and maintain a daily site diary.</p> <p>23.4 Keep copies of all reports submitted to the Department.</p> <p>23.5 Keep and maintain a schedule of current site activities including the monitoring of such activities.</p> <p>23.6 Obtain and keep record of all documentation, permits, licences and authorisations required by this facility.</p> <p>23.7 Compile a monthly monitoring report.</p> | | | | N/A | The owner takes not of this condition |



Client name: Mulilo Renewable Project Developments (Pty)Ltd
Athorisation Holder: Du Plessis Solar PV4 (Pty) Ltd
Project name: Du Plessis Solar PV4
Authorisation registered number: 12/12/20/2498
Date issued: 28/09/2012
Last Amended: 03/05/2017
Environmental Auditor: Charles Lubbe (Principal EAP)
Audit date: 25/11/2019



**SCOPE OF AUTHORISATION
ENVIRONMENTAL AUDIT REPORT**

| | | | | | | |
|----|--|--|--|--|-----|---|
| 24 | The holder of this environmental authorisation 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. | | | | N/A | The owner takes note of this condition |
| 25 | <p>The environmental audit report must:</p> <p>25.1 Be compiled by an independent environmental auditor;</p> <p>25.2 Indicate the date of the audit, the name of the auditor and the outcome of the audit;</p> <p>25.3 Evaluate compliance with the requirements of the approved EMPr and this environmental authorisation;</p> <p>25.4 Include measures to be implemented to attend to any non-compliances or degradation noted;</p> <p>25.5 Include copies of any approvals granted by other authorities relevant to the development for the reporting period;</p> <p>25.6 Highlight any outstanding environmental issues that must be addressed, along with recommendations for ensuring these issues are appropriately addressed;</p> <p>25.7 Include a copy of this authorisation and the approved EMPr.</p> <p>25.8 Include all documentation pertaining to this authorisation.</p> <p>25.9 Include evidence of adherence to the conditions of this authorisation and the EMPr where relevant such as training records and attendance records.</p> | | | | N/A | This is the first audit and is conducted by an independent environmental auditor as required under section 54 A (3) of the Amended EIA regulations 2014. All requirements highlighted under this condition is adhered to. |

COMMENCEMENT OF ACTIVITY

| | | | | | | |
|----|---|--|---|--|-----|---|
| 26 | The authorised activity shall not commence within twenty (20) days of the date of signature of the authorisation. | | ✓ | | 3 | The authorisation was issued on 28/09/2012 and none of the activities has commenced as yet. |
| 27 | An appeal under section 43 of the National Environmental Management Act (NEMA), Act 107 of 1998 (as amended), does not suspend an environmental authorisation or exemption, or any provisions or conditions attached thereto, or any directive, unless the Minister, MEC or delegated organ of state directs otherwise. | | | | N/A | The owner takes note of this condition |
| 28 | Should you be notified by the Minister of a suspension of the authorisation pending appeal procedures, you may not commence with the activity until such time that the Minister allows you to commence with such an activity in writing. | | | | N/A | The owner takes note of this condition |

NOTIFICATION TO AUTHORITIES

| | | | | | | |
|----|---|--|--|--|-----|--|
| 29 | Fourteen (14) days written notice must be given to the Department that the activity will commence. 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. This notification period may coincide with the Notice of Intent to Appeal period. | | | | N/A | The owner takes note of this condition |
|----|---|--|--|--|-----|--|



Client name: Mulilo Renewable Project Developments (Pty)Ltd
Athorisation Holder: Du Plessis Solar PV4 (Pty) Ltd
Project name: Du Plessis Solar PV4
Authorisation registered number: 12/12/20/2498
Date issued: 28/09/2012
Last Amended: 03/05/2017
Environmental Auditor: Charles Lubbe (Principal EAP)
Audit date: 25/11/2019



**SCOPE OF AUTHORISATION
OPERATION OF THE ACTIVITY**

Conditions under this heading are not applicable at this stage and are not considered during this audit

SITE CLOSURE AND DECOMMISSIONING

Conditions under this heading are not applicable at this stage and are not considered during this audit

SPECIFIC CONDITIONS

| | | | | | | |
|----|---|--|---|--|-----|---|
| 32 | The holder of this authorisation must obtain a Water Use Licence from the Department of Water Affairs (DWA) prior to the commencement of the project should the applicant impact on any wetland or water resource. A copy of the license must be kept by the ECO on site. | | | | N/A | The owner takes not of this condition |
| 33 | No exotic plants may be used for rehabilitation purposes. Only indigenous plants of the area may be utilised. | | | | N/A | The owner takes not of this condition |
| 34 | A lighting engineer must be consulted to assist in the planning and placement of light fixtures in order to reduce the impacts associated with glare and light trespass. | | ✓ | | 3 | A confirmation letter dated 13 January 2016 from an engineering company that is a member of the Illumination Engineering Society of SA was in place. The letter also includes the mitigatory specifications that the project must implement to reduce light trespass and light pollution. |
| 35 | An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal where appropriate. Any solid waste shall be disposed of at a landfill licensed in terms of section 20 (b) of the National Environment Management Waste Act, 2008 (Act No. 59 of 2008). Copies of all waste disposal certificates must be kept on site. | | | | N/A | The owner takes not of this condition |
| 36 | Vegetation clearing must be limited to the required footprint. Mitigation measures must be implemented to reduce the risk of erosion and the invasion of alien species. | | | | N/A | The owner takes not of this condition |
| 37 | Before the clearing of the site, the appropriate permits must be obtained from the Department of Agriculture, Forestry and Fisheries (DAFF) for the removal of plants listed in the National Forest Act 87 of 1998 and from the relevant provincial department for the destruction of species protected in terms of the specific provincial legislation. | | ✓ | | 3 | The Flora permit that was in place has expired on 09/11/2019 and the Fauna permit expired on 01/11/2018. It is recommended that the owner applies for the renewal of these permits before clearing starts. |
| 38 | Cleared alien vegetation must not be dumped on adjacent intact vegetation during clearing but should be temporarily stored in a demarcated area. | | | | N/A | The owner takes not of this condition |
| 39 | Removal of alien invasive species or other vegetation and follow-up procedures must be in accordance with the Conservation of Agricultural Resources Act, 1983 (Act 43 of 1983). | | | | N/A | The owner takes not of this condition |
| 40 | The applicant must ensure that all the "No-go" areas are clearly demarcated (using fencing and appropriate signage) before construction commences. | | | | N/A | The owner takes not of this condition |
| 41 | Construction activities must be restricted to demarcated areas to restrict impact on vegetation, birds and animals. Contractors and construction workers must be clearly informed of the no-go areas. | | | | N/A | The owner takes not of this condition |
| 42 | Roads must be designed so that changes to surface water runoff are avoided and erosion is not initiated | | | | N/A | The owner takes not of this condition |



Client name: Mulilo Renewable Project Developments (Pty)Ltd
Athorisation Holder: Du Plessis Solar PV4 (Pty) Ltd
Project name: Du Plessis Solar PV4
Authorisation registered number: 12/12/20/2498
Date issued: 28/09/2012
Last Amended: 03/05/2017
Environmental Auditor: Charles Lubbe (Principal EAP)
Audit date: 25/11/2019



SCOPE OF AUTHORISATION

| | | | | | | |
|----|---|--|---|--|-----|---|
| 43 | Should any archaeological sites, artefacts, paleontological fossils or graves be exposed during construction work, work in the immediate vicinity of the find must be stopped, the South African Heritage Resources Agency (SAHRA) must be informed and the services of an accredited heritage professional obtained for an assessment of the heritage resources must be made. | | | | N/A | The owner takes not of this condition |
| 44 | Appropriate dust suppression techniques must be implemented on all exposed surfaces during periods of high wind. Such measures must include wet suppression, chemical stabilization, the use of a wind fence, covering surfaces with straw chippings and re-vegetation of open areas. | | | | N/A | The owner takes not of this condition |
| 45 | Erosion and loss of soil must be prevented by minimizing the construction site exposed to surface water run-off. Where necessary erosion stabilizing actions such as gabions or re-vegetation must be implemented to prevent further habitat deterioration. | | | | N/A | The owner takes not of this condition |
| 46 | The applicant must train safety representatives, managers and workers in workplace safety. All applicable safety standards and regulations, including for subcontractors must be enforced. | | | | N/A | The owner takes not of this condition |
| 47 | A bird monitoring programme must be implemented and undertaken once every six months for a period of up to 12 months prior to construction and 12 months after construction (operation phase) to document the effect of the operation of the solar energy facility on birds. | | ✓ | | 3 | A Pre-construction bird monitoring report dated April 2014 was in place |
| 48 | Final reports regarding bird monitoring must be submitted to BirdLife South Africa, the Endangered Wildlife Trust (EWT) and this Department on a six-monthly basis. The report will assist all stakeholders in identifying potential and additional mitigation measures and to establish protocols for bird monitoring programmes for PV solar energy development in the country. | | ✓ | | 3 | The Pre-construction bird monitoring report was submitted to BirdLife SA and DEA on 20 January 2016 |
| 49 | The area around the historical farm werf must be cordoned off, protected from all harm and treated as an outright no-go area. | | | | N/A | The owner takes not of this condition |
| 50 | Disturbed areas within the riparian zones and stream beds must be rehabilitated after construction has been completed and revegetated with suitable indigenous vegetation. | | | | N/A | The owner takes not of this condition |
| 51 | A buffer of 30m must be maintained adjacent to the identified rivers and streams and 75m from the wetland areas. | | | | N/A | The owner takes not of this condition |
| 52 | The applicant must obtain a way leave from the Department of Public Transport Roads and Works prior construction. | | ✓ | | 3 | Approval letter dated 29 April 2016 was in place |
| 53 | Anti-collision devices such as bird flappers must be installed where transmission lines crosses avifaunal corridors. | | | | N/A | The owner takes not of this condition |



| |
|--|
| Client name: Mulilo Renewable Project Developments (Pty)Ltd |
| Athorisation Holder: Du Plessis Solar PV4 (Pty) Ltd |
| Project name: Du Plessis Solar PV4 |
| Authorisation registered number: 12/12/20/2498 |
| Date issued: 28/09/2012 |
| Last Amended: 03/05/2017 |
| Environmental Auditor: Charles Lubbe (Principal EAP) |
| Audit date: 25/11/2019 |



SCOPE OF AUTHORISATION

GENERAL

| | | | | | | |
|----|--|--|--|--|-----|---|
| 54 | A copy of this authorisation and the approved EMPr must be kept at the property where the activity will be undertaken. The environmental authorisation as well as any amendment to the environmental authorisation and approved EMPr must be provided to any authorised official of the Department who requests to see it and must be made available for inspection by any employee or agent of the holder of the environmental authorisation who works or undertakes work at the property. | | | | N/A | The owner takes note of this condition |
| 55 | The holder of the authorisation must notify both the Director: Integrated Environmental Authorisations and the Director: Compliance Monitoring at the Department, in writing and within 48 (forty eight) hours, if any condition of this authorisation cannot be or is not adhered to. Any notification in terms of this condition must be accompanied by reasons for the non-compliance. | | | | N/A | The owner takes note of this condition. The condition will be implemented during the construction phase |
| 56 | 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 or his 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 with the conditions of authorisation as set out in this document or any other subsequent document emanating from these conditions of authorisation. | | | | N/A | The owner takes note of this condition |

| | |
|-------------|-------|
| | 27 |
| TOTAL SCORE | 81 |
| AVERAGE | 3,0 |
| PERCENTAGE | 100,0 |

APPENDIX B
ENVIRONMENTAL MANAGEMENT PROGRAMME CHECKLISTS

3 POINT RATING SCALE



Not compliant

Compliant

- 3 - full compliance
- 2 - partial compliance (viz >50% compliance)
- 1 - Insufficient compliance (viz <50% compliance)
- 0 - nothing in place
- N/A - not applicable

The total score, average score and percentage compliance for each aspect of all elements is calculated.

ENVIRONMENTAL MANAGEMENT PROGRAMME CHECKLIST FOR THE DU PLESSIS SOLAR PV 4, NORTHERN CAPE

Client name: Mulilo Renewable Project Developments (Pty)Ltd

Project name: Du Plessis Solar PV4

EMPr Revision: Updated as of March 2016

Environmental Auditor: Charles Lubbe (Principal EAP)

Audit date: 25/11/2019



PRE-CONSTRUCTION & DESIGN PHASE REQUIREMENTS

| EMPr Page Number | Environmental Condition | Compliant | Not Compliant | Rating | Owner / Auditor Comment | Auditor Recommendations |
|--|--|-----------|---------------|--------|---|-------------------------|
| 4.2 Requirements & Mitigation Measures Arising From Specialist Studies: | | | | | | |
| EMPr, pg. 15 | 4.2.1 Ecology | | | | | |
| EMPr, pg. 15 | Unnecessary impacts on surrounding natural vegetation must be avoided. The construction impacts must be contained to the footprint of the solar array and other associated infrastructure. | | | N/A | The owner takes note of this condition | |
| EMPr, pg. 15 | Where disturbance is unavoidable, disturbed areas should be rehabilitated as quickly as possible. | | | N/A | The owner takes note of this condition | |
| EMPr, pg. 15 | Areas outside the construction footprint should be fenced and access to these areas should be limited as much as possible. | ✓ | | 3 | Included in the design | |
| EMPr, pg. 15 | If possible, place infrastructure a minimum of 50 m from watercourses. | ✓ | | 3 | Project is located away from the Northern and Western watercourse | |
| EMPr, pg. 15 | Ground surfaces within the solar array must be properly maintained to avoid erosion impacts. This would require ensuring that ground surfaces do not remain bare, either by planting a cover crop, rehabilitating vegetation or by covering with a suitable grade of gravel. | ✓ | | 3 | An Erosion Management Plan was included in the EMPr as Appendix 7. | |
| EMPr, pg. 15 | Any alien plants within the control zone of the company must be immediately controlled to avoid establishment of a soil seed bank. Control measures must follow established norms and legal limitations in terms of the method to be used and the chemical substances used. | ✓ | | 3 | An Invasive Alien Management Plan dated 5 February 2016 was in place. | |
| EMPr, pg. 15 | An on-going monitoring programme should be implemented to detect and quantify any aliens that may become established and provide information for the management of aliens. | | | N/A | The owner takes note of this condition | |
| EMPr, pg. 16 | A comprehensive storm-water management plan must be compiled for the solar array. In relation to the above, please refer to Appendix 1,2,3,4 and 6, which contain the Final Site Layout Plan, the Alien Invasive Management Plan, the Plant Rescue and Protection Plan, the Re-vegetation and Habitat Rehabilitation Plan, as well as the Stormwater Management Plan. | ✓ | | 3 | A Stormwater Management Plan dated 8 February was in place. | |
| EMPr, pg. 16 | 4.2.2 Fresh Water Ecology | | | | | |
| EMPr, pg. 16 | Construction activities should as far as possible be limited to the delineated site for the proposed development and the identified access routes. A buffer of 30m should be maintained adjacent to the identified freshwater features. It is important that any of the cleared areas that are not hardened surfaces are rehabilitated after construction is completed by revegetating the areas disturbed by the construction activities with suitable indigenous plants. Invasive alien plants that currently exist within the immediate area of the construction activities should also be removed and the sites. | | | N/A | The owner takes note of this condition | |
| EMPr, pg. 16 | Run-off over the exposed areas should be mitigated to reduce the rate and volume of run-off and prevent erosion occurring on the site and within the freshwater features and drainage lines. Contaminated runoff from the construction site(s) should be prevented from entering the rivers. All materials on the construction sites should be properly stored and contained. Disposal of waste from the sites should also be properly managed. Construction workers should be given ablution facilities at the construction sites that are located at least 100m away from the river system and regularly serviced. | | | N/A | The owner takes note of this condition | |
| EMPr, pg. 16 | Operational activities should as far as possible be limited to the delineated site for the proposed development and the identified access routes. Invasive alien plant growth should be monitored on an ongoing basis to ensure that these disturbed areas do not become infested with invasive alien plants. | | | N/A | The owner takes note of this condition | |

PRE-CONSTRUCTION & DESIGN PHASE REQUIREMENTS

| EMPr Page Number | Environmental Condition | Compliant | Not Compliant | Rating | Owner / Auditor Comment | Auditor Recommendations |
|------------------|---|-----------|---------------|--------|---|-------------------------|
| EMPr, pg. 16 | Storm water run-off infrastructure must be maintained to mitigate both the flow and water quality impacts of any storm water leaving the PV facilities site. | ✓ | | 3 | A Stormwater Management Plan dated 8 February was in place. | |
| EMPr, pg. 16 | Where transmission lines need to be constructed over/through the drainage channel, disturbance of the channel should be limited. All crossings over drainage channels or stream beds after the construction phase should be rehabilitated such that the flow within the drainage channel is not impeded. | | | N/A | The owner takes note of this condition | |
| EMPr, pg. 16 | Where access routes need to be constructed through ephemeral streams, disturbance of the channel should be limited. All crossings over drainage channels or stream beds should be such that the flow within the drainage channel is not impeded. Any disturbed areas should be rehabilitated and monitored to ensure that these areas do not become subject to erosion or invasive alien plant growth. | ✓ | | 3 | A Stormwater Management Plan dated 8 February was in place. | |
| EMPr, pg. 16 | 4.2.3 Avifauna | | | | | |
| EMPr, pg. 16 | Minimise the footprint of the development to the bare minimum; | | | N/A | The owner takes note of this condition | |
| EMPr, pg. 16 | Demarcation of 'no-go' areas to minimise disturbance impacts associated with the construction of the facility; | | | N/A | The owner takes note of this condition | |
| EMPr, pg. 16 | Reducing and maintaining noise disturbance to a minimum. | | | N/A | The owner takes note of this condition | |
| EMPr, pg. 17 | In the event that any breeding sites of priority species (refer to Appendix 3 of the Avifaunal Report contained within Annexure D of the Amended Final BAR) are identified on the site during the course of any pre-construction monitoring, mitigation measures would need to be assessed based on the particular species breeding, location of the nest site and the knowledge and experience of the avifaunal specialist, these could include (a) at the very least demarcating the nest site with a buffer of at least 150 m to make construction workers aware of the breeding activity and to minimise disturbance caused by construction activities, and/or (b) postponing construction until breeding has finished (i.e. the chick or chicks have fledged and all birds have vacated the area); it will be important that the buffer zone allocation and postponement of construction (if required) be done in consultation with the avifaunal specialist, the EAP and the client. If no priority species are found to be breeding then construction can proceed without further mitigation1. | ✓ | | 3 | Pre-construction bird monitoring plan dated April 2014 was in place | |
| EMPr, pg. 17 | From an avifaunal perspective, complete concrete bases would be preferred as this would reduce vegetation making it less attractive for invertebrates and therefore less attractive to birds to forage in and around the PV panels. | | | N/A | The owner takes note of this condition | |
| EMPr, pg. 17 | Minimizing the disturbance associated with the operation of the facility, by scheduling maintenance activities to avoid and/or reduce disturbance; | | | N/A | The owner takes note of this condition | |
| EMPr, pg. 17 | Excluding/restricting development from any sensitive areas, including nest sites of raptors and/or red-listed species, proximity to wetlands and any significant flight paths through the development areas. Such areas will be identified through comprehensive pre-construction monitoring programme; | ✓ | | 3 | A Final Site Layout superimposed on Sensitivity map was included in the EMPr as Appendix 9. | |
| EMPr, pg. 17 | Wetland species are usually concentrated around wetlands themselves, but flight routes into and away from the wetland may also be affected by the placement of powerlines and/or PV panels. Hence, 'no-go' zones would include: • Areas within 1 km of major wetlands to reduce disturbance and collision risk for waterbirds, and possibly Blue Cranes that may utilise the wetlands in the area. • Areas within 1 km of any raptor nests or breeding sites for red-listed large terrestrial birds, specifically Ludwig's Bustard and Blue Crane. | | | N/A | The owner takes note of this condition | |
| EMPr, pg. 17 | Minimising the length of any new powerlines installed, and ensuring that all new lines are marked with bird flight diverters along their entire length. It is imperative that all new powerline infrastructure is adequately insulated and bird friendly when configured. Powerlines rather than the actual PV panels, probably represent the greatest threat to birds in PVEF projects. Thus, ideally powerlines should be buried underground to avoid any likelihood of birds colliding with them. | ✓ | | 3 | Included in the design | |

PRE-CONSTRUCTION & DESIGN PHASE REQUIREMENTS

| EMPr Page Number | Environmental Condition | Compliant | Not Compliant | Rating | Owner / Auditor Comment | Auditor Recommendations |
|--|--|-----------|---------------|--------|--|-------------------------|
| EMPr, pg. 17 | Specific powerline mitigation measures would include the following: <ul style="list-style-type: none"> It is strongly recommended that should the development be approved and lines cannot be buried, the preferred transmission line and not the alternative line should be used. This is closest to the De Aar substation therefore limiting the length of the line which would help in reducing impacts on birds. Carefully monitoring the local avifauna through additional site surveys and/or pre and post-construction monitoring programme, and implementing appropriate additional mitigation as and when significant changes are recorded in the number, distribution or breeding behaviour of any of the priority species listed in this report, or when collision or electrocution mortalities are recorded for any of the priority species listed in this report. Additional mitigation arising from the results of additional surveys and/or preconstruction monitoring might include adjusting the siting of PV panels positioned in areas subsequently identified as important for disturbance and/or displacement of sensitive species and scheduling construction or maintenance activities on site to periods outside of the breeding season. | ✓ | | 3 | included in the design | |
| EMPr, pg. 18 | 4.2.4 Heritage | | | | | |
| EMPr, pg. 18 | Clearing of vegetation must be kept to a minimum in order to preserve as much of the typical local landscape character as possible. | | | N/A | The owner takes note of this condition | |
| EMPr, pg. 18 | All workmen and equipment must operate within the footprint area to be developed so as to avoid any unnecessary disturbance of heritage resources. | | | N/A | The owner takes note of this condition | |
| EMPr, pg. 18 | The development should avoid the undulating and higher lying land in the western part of the study area. | | | N/A | The owner takes note of this condition | |
| EMPr, pg. 18 | The area around the historical farm werf (See GPS co-ordinates in Table 4, below) should be cordoned off, protected from all harm and treated as an outright no-go area. This is important since the site is more tangible than Stone Age sites and thus more prone to vandalism and theft. Table 4: List of co-ordinates to be considered a no-go zone on the Farm Du Plessis Dam No 179. Co-ordinate S30 38 11.1 E24 03 47.1 S30 38 15.1 E24 03 46.1 S30 38 20.0 E24 03 54.8 S30 38 18.1 E24 04 02.9 S30 38 14.8 E24 04 05.7 S30 38 07.6 E24 03 58.2 | ✓ | | 3 | A Final Site Layout superimposed on Sensitivity map was included in the EMPr as Appendix 9. This will also be closely monitored during the construction phase. | |
| EMPr, pg. 18 | 4.2.5 Visual | | | | | |
| EMPr, pg. 18 | New structures should be placed where they are least visible to the greatest numbers of people, i.e. in places where the topography can offer shielding (where possible). | ✓ | | 3 | Included in the design | |
| EMPr, pg. 18 | Site offices, if required, shall be limited to a single storey and shall be sited carefully using temporary screen fencing to screen from the wider landscape. | | | N/A | The owner takes note of this condition | |
| EMPr, pg. 18 | Buildings should as far as possible, be clad and roofed in materials that will blend in with the local landscape. | | | N/A | The owner takes note of this condition | |
| EMPr, pg. 18 | Finishing materials for the infrastructure (including support structures) should be of colours that are non-reflective and in dark matte colours such as dark grey or charcoal. | | | N/A | The owner takes note of this condition | |
| 4.3 Tender Documentation: | | | | | | |
| EMPr, pg. 19 | The Developer (Du Plessis Solar PV4 (Pty) Ltd) shall ensure that this EMPr is included within the tender documents for all contractors tendering to undertake any aspects of the construction phase of the project. | | | N/A | The owner takes note of this condition | |
| EMPr, pg. 19 | In the adjudication of any tenders to undertake any aspect of the construction or operation of the proposed project, Du Plessis Solar PV4 (Pty) Ltd (or Du Plessis Solar PV4 (Pty) Ltd s' agent in this regard) must ensure that the costs of compliance with the Environmental Management Program have been adequately allowed for within the winning tender. | | | N/A | The owner takes note of this condition | |
| 4.4 Additional Pre-construction Requirements: | | | | | | |
| EMPr, pg. 19 | Notify all registered I&APs and key stakeholders of the Environmental Authorisation opportunity and appeal procedure. | ✓ | | 3 | All requirements were adhered to | |

PRE-CONSTRUCTION & DESIGN PHASE REQUIREMENTS

| EMPr Page Number | Environmental Condition | Compliant | Not Compliant | Rating | Owner / Auditor Comment | Auditor Recommendations |
|------------------|---|-----------|---------------|--------|--|-------------------------|
| EMPr, pg. 19 | Notify DEA prior to commencement of construction. | | | N/A | The owner takes note of this condition | |
| EMPr, pg. 19 | Comply with any further pre-construction requirements as outlined within the Environmental Authorization (Appendix 10) | | | N/A | The owner takes note of this condition | |
| EMPr, pg. 19 | The roads authorities shall be contacted prior to construction to ensure that the necessary road upgrades, permits, traffic escorts, etc. are scheduled (if relevant). | ✓ | | 3 | Approval letter dated 29 April 2016 was in place | |
| EMPr, pg. 19 | A health and safety plan must be developed prior to the commencement of construction to identify and avoid work related accidents. | | | N/A | The owner takes note of this condition | |
| EMPr, pg. 19 | The Developer should establish a recruitment and procurement policy which sets reasonable targets for the employment of South African and local residents /suppliers. All contractors should be required to procure and recruit in terms of the Du Plessis Solar PV 4 recruitment and procurement policy. | | | N/A | The owner takes note of this condition | |
| EMPr, pg. 19 | A Code of Conduct must be developed for all workers and contractors directly related to the project. The objective of the code of conduct is to limit, where possible, social ills brought about by the construction and operation of the renewable energy facility. | | | N/A | The owner takes note of this condition | |

15

| | |
|-------------|-------|
| TOTAL SCORE | 45 |
| AVERAGE | 3,0 |
| PERCENTAGE | 100,0 |