

RustMo1 Solar Farm

Environmental and Social Action Plan

Quarter 1 Report

31 March 2013

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1. Overview and Principle 1

RustMo1 Solar Farm (Pty) Ltd (RustMo1) hereby submits the first ESAP Quarterly Report that covers the actions taken with regards to the environmental and safety aspects of the Project (RustMo1 PV Solar Power Generation Facility) and primarily focussing on the commitments made in the Environmental and Social Action Plan (ESAP) on 12 June 2012. Note that this report covers the initial period of construction work which is the only work that has been carried out thus far. Construction commenced on 18 February 2013.

In terms of the Equator Principles the project has been categorised as Category B Project – which is the first of the ten Equator Principles espoused. This report provides comment on the first seven principles. Principles 8, 9 and 10 are superfluous in the context of this report and therefore not discussed.

In support of the statements made herein, supporting documents appear as Appendices at the end.

2. Principle 2: Social and Environmental Assessment

- 2.1 The Environmental Authorisation for the project has been issued by the Department of Environmental Affairs (the EA has been previously submitted to the LTA).
- 2.2 Comments from SAHRA, DAFF, DWA, Biodiversity Specialist, Heritage Impact Specialist, Soils and Agriculture Specialist and the Palaeontologist have been previously submitted to the LTA.
- 2.3 An Environmental Management System that takes into account the requirements of the Environmental Authorisation, the Environmental Management Programme, the ESAP and the Schedule on occupational health and safety in the EPC contract, has been created for the Project and has been submitted to the LTA for comment.
- 2.4 A semi-annual report on the health and safety risk assessment is due at the next Quarterly Report (RustMo1 ESAP Quarterly Report 2).
- 2.5 Interested and Affected Parties:
A copy of the I&AP Register is available at site. Refer to ECO Supplementary Report Q1 in [Appendix 5](#).
An Environmental Incident Book for all I&APs has been implemented at site. Refer to [Appendix 6](#) – Incident Book Implemented.
- 2.6 There were no environmental incidents reported in the period for Quarter 1 – refer to [Appendices 5 and 7](#).
- 2.7 With regards to the risk of over using water, an Operations Cleaning Manual and an Operator Training Manual were duly submitted to the LTA. The Training Manual is to be ratified by the Board prior to COD.
- 2.8 With regards to the occupational health and safety on site for Q1, a full time Safety Officer has been appointed (refer to [Appendix 13](#) – Appointment Letter of Safety Officer) who carries out safety induction on all new site workers at the first moment of arriving on site. Safety signs have been erected as and where required. The safety officer maintains an Incident Report process on all matters pertaining to health and

safety at site. Compulsory use of PPE by all workers and visitors at site is meticulously followed. Further, a Safety Committee has been formed for the project for the duration of the construction. Refer to [Appendix 22](#) for the composition of the Safety Committee and [Appendix 23a and 23b](#) for minutes of the Safety Committee Meetings.

- 2.9 Training of employees in the conditions set out in the EMP and Occupational Health and Safety requirements may be found in the following Appendices:

Appendix	Description
8	EMP_ToolboxTalk1
9	EMP_ToolboxTalk2
10	EMP_ToolboxTalk3
11	HealthSafetyInduction_Workers_Q1
12	HealthSafetyInduction_Visitors_Q1
18	Basic Fire Fighting Training Certificates
19	Basic First Aid Certificates
20	General Environmental Health and Safety Training Records

- 2.10 A draft Employment Policy for RustMo1 has been submitted to the LTA.

3. Principle 3: Applicable Social and Environmental Standards

- 3.1 The project work to date conforms to the EA and the EMP – refer to [Appendices 1 and 2](#). [Appendices 3 and 4](#) provide proof that the ECO Report has been duly submitted to the DEA.
- 3.2 For a register of the training provided to site workers, refer to [Appendices 8 to 12](#) and [Appendices 18 to 20](#).
- 3.3 Emergency Procedures: this has been drawn up for the project – refer to [Appendix 24](#) for a copy of the Procedure and [Appendix 5](#), the ECO’s Supplementary report, for confirmation.
- 3.4 Collaboration with communities: the following Appendices show the various actions implemented in order to maintain a close liaison and cooperation with the local communities – especially with the communities of Lapologang and Tsakane Villages as they are located closest to the project site:

Appendix	Subject	Description
6	Environmental Incident Book	Implementation of this book allows any Project I&AP from the surrounding communities to record any issue of an environmental nature. This book is checked monthly by RustMo1 Representative and ensures follow up actions to any incidents recorded therein.
14	Environmental Incidence Book – Community Notice	Proof that a notice has been placed at site for public awareness that the Incident Book is available.
15	Appointment of T Ncheche – Community Liaison Officer	Mr Ncheche is the Chairperson of the Residents’ Association of the Village of Lapologang. He has been employed as the

		Community Liaison Officer for the project for the duration of construction. His primary duty is two-fold: (1) provide the required skills for construction work from local resource base and (2) report back to the community on the progress of the project on a regular basis.
16	Community Meeting and Register	RustMo1 Solar Farm initiated a meeting with the community prior to commencement of construction work and informed the community of the requirements for labour and of the environmental incident book. The community participated in this meeting with much enthusiasm.
17	Municipality Meeting and Register	In order to ensure that the local municipality is kept abreast of progress in the Project prior to construction, a meeting was arranged with the local Ward Councillor and the Speaker of the Council of Rustenburg Municipality.

- 3.5 This full report may be viewed in the following website after 30 April 2013: www.momentousenergy.com.
- 3.6 [Appendix 5](#), the ECO Supplementary Report, confirms that no degradation of the site has occurred due to pesticides or herbicides.

4. Principle 4: Action Plan and Management System

- 4.1 The construction workers have been trained in the EMP as they arrive to commence work on site – refer to [Appendices 8, 9, 10, 11, 12, 18, 19 and 20](#). A copy of the EMP is available at all times at site.
- 4.2 An independent ECO (Environmental Control Officer) from Savannah Environmentals has been appointed for the Project. The appointment letter has been previously submitted to the LTA. [Appendix 21](#) records the internal Environmental audit carried out by the ECO.
- 4.3 The ECO Monitoring Reports show compliance to the EMP – refer to [Appendices 1 to 4](#).
- 4.4 A tangible form of the I&AP Register is available at site – refer to ECO Supplementary Report in [Appendix 5](#).

5. Principle 5: Consultation and Disclosure

- 5.1 Consultations with all stakeholders is an ongoing process. This can be verified through the ECO Supplementary Report in [Appendix 5](#) and the community meetings as recorded in [Appendices 16 and 17](#).
- 5.2 While written records of positive (or negative) feedback from the communities may not be available for this report, there has been verbal positive feedback from the local areas through the Community Liaison Officer.

6. Principal 6: Grievance Mechanism

A grievance book for workers has been implemented at the Project Office and is available 24 hours per day in the Security Office. To date no incident has been recorded. The ECO's Supplementary Report, [Appendix 5](#), confirms this.

7. Principle 7: Independent Review

An independent review of the Project from an environmental, safety and social aspect has been undertaken by Arup, the Lenders' Technical Advisor.

8. Appendix List

Appendix	Description
1	ECO Monthly Report 1 – February 2013
2	ECO Monthly Report 2 – March 2013
3	Proof of submission – ECO Monthly Report 1
4	Proof of submission – ECO Monthly Report 2
5	ECO-Supplementary Report Q1
6	Incident Books Implemented
7	Safety_Environmental_Worker_IncidentBooks_Q1
8	EMP_ToolboxTalk1
9	EMP_ToolboxTalk2
10	EMP_ToolboxTalk3
11	HealthSafetyInduction_Workers_Q1
12	HealthSafetyInduction_Visitors_Q1
13	Appointment Letter – Safety Officer
14	Environmental Incidence Book – Community Notice
15	Appointment of T Ncheche – CLO
16	Community Meeting and Register
17	Municipality Meeting and Register
18	Basic Fire Fighting Training Certificates
19	Basic First Aid Certificates
20	General Environmental Health and Safety Training Records
21	ECO Internal Environmental Audit Report
22	Safety Committee Members
23a	Safety Committee Meeting 1
23b	Safety Committee meeting 2
24	Site Emergency Procedures