

# **RustMo1 Solar Farm**

## **Environmental and Social Action Plan**

### **Quarter 3 Report**

**30 September 2013**

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## 1. Overview and Principle 1

RustMo1 Solar Farm (Pty) Ltd (RustMo1) hereby submits the third 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) as well as the Environmental Authorisation issued by the Dept of Environmental Affairs for this project. Note that this report covers the period from 1 July 2013 to 30 September 2013 that comprises only of construction work (MV and HV connections). Most of the construction work was completed during the early part of this quarter; thus the number of workers on site and the number of incidents on site is reduced in comparison to previous quarterly periods for construction.

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

## 2. Principle 2: Social and Environmental Assessment

- 2.1 Draft EMS: to be ratified at next Board meeting.
- 2.2 The semi-annual report on the health and safety risk assessment will commence once Operations commences. A health and safety risk assessment will be completed by July 2014.
- 2.3 Interested and Affected Parties Register: Closed off.
- 2.4 Modules cleaning Training Manual: to be ratified at next Board meeting.
- 2.5 Planting of replacement Indigenous Plants: due January 2014.
- 2.6 The following incidents were recorded in the Environmental, Safety and Worker Incident Books: (refer to [Appendices 1 and 2](#) respectively).
  - 2.6.1 Module Theft and Shooting Incidents on Site

Around midnight of 05 July 2013 and 10 July 2013 about 8 suspects came into the site. When they were accosted by the site security personnel, the site security personnel were fired upon by the suspects. The site security personnel were unarmed; they dispersed and hid among the PV panels when the shooting began. The suspects hit 5 modules in the process. Besides the 5 damaged modules due to the shooting a further 6 modules were stolen during these armed incidents.

### Action Taken

- The matters were duly reported to the police.
- Security was increased at site; thereafter no incidents were reported.

### Mitigation Measures

- A comprehensive risk analysis has been done on site by specialists and higher levels of fixed and electronic security have been proposed;
- Enhanced security features such as an additional electric fence is proposed;
- Further a smart system to electronically monitor guard patrol movements during operations will be installed and this has also been proposed in the variation order;
- The variation order has been accepted by all parties: RustMo1 Board members, Nedbank and IDC.
- The extra security installation has commenced.

2.7 Economic Development Plan – [Appendix 3](#) hereunder sets out Juwi’s commitments and achievements in terms of the Contractors Economic development obligations for the period 1 July 2013 to 30 July 2013; [Appendix 4](#) sets out Juwi’s achievements for the month of August and out in [Appendix 21](#) sets out Juwi’s achievements for the month of September 2013.

Do note that the RustMo1 Project Company will begin its own economic development activities upon commencement of Operations.

2.8 The following training was carried out during the three months under consideration in this report:

<b>Appendix</b>	<b>Description</b>
5	<a href="#">09/07: ECO Training on Spillage Response and Waste Management</a>
6	<a href="#">Tool Box Talk 1</a>
7	<a href="#">Tool Box Talk 2</a>
8	<a href="#">Tool Box Talk 3</a>
9	<a href="#">Tool Box Talk 4</a>
10	<a href="#">Tool Box Talk 5</a>
11	<a href="#">Tool Box Talk 6</a>

2.9 RustMo1 Solar Farm Employment Policy: draft closed out; final to be ratified by Board.

2.10 Appointment of Health and Safety Officer: closed out. Note that the Health and Safety Officer has been on full time duty at the site throughout the period under review.

2.11 Job Opportunities for local community: Database of all employees, showing addresses, submitted on 30 June 2013 to LTA.

### 3. Principle 3: Applicable Social and Environmental Standards

- 3.1 Engagement of legal advisors: closed out.
- 3.2 Environmental Monitoring: refer to the following reports from the appointed ECO that includes the monthly Compliance Reports submitted to the DEA and an internal audit report:

Appendix	Description
12	<a href="#">ECO Compliance Report for July 2013</a>
13	<a href="#">Proof of Submission of July Report to DEA</a>
14	<a href="#">ECO Compliance Report for August 2013</a>
15	<a href="#">Proof of Submission of August Report to DEA</a>
16	<a href="#">ECO Compliance Report for September 2013</a>

Note that we still await the proof of submission of the report to the DEA from Savannah, the Environmental consultant for September 2013.

- 3.3 Compliance to OSHA: refer to 2.8 (above) that show regular health and safety training carried out with workers; refer also to 2.6 above for a record of the incidents on site, including a worker industrial action, which allude to correct procedures being adopted by site management. In this regard the installation and cold commissioning of the MV equipment of the site was accomplished during the period under review. Refer to [Appendix 20](#) which is the MV Installation Safety Report from Juwi on behalf of the Subcontractor, Brand.
- 3.4 Training sessions carried out: refer to 2.8 above.
- 3.5 Collaboration and communication with Affected Communities:
- 3.5.1 Community Liaison Officer appointed (see previous ESAP Quarterly Report);
- 3.5.2 The Community Trust has had two meetings to date with the first on 27 July 2013 and the second on 7 August 2013. All Trustees were present at both meetings; Community elected Trustees report back to the communities on proceedings;
- 3.5.3 The local workers to Subcontractor Lerumo (the subcontractor to Terrafix – installation of the Mounting Structures for the project) were issued certificates of work accomplished which will enhance the CVs of the workers. Refer to [Appendix 17](#) for the report by Lerumo confirming this action.
- 3.6 Waste disposal: Waste is disposed off by licensed waste management service providers, Sanitech and Interwaste. Refer to [Appendix 18](#) and [Appendix 19](#), the waste certificates of the respective service providers.
- 3.7 Replanting indigenous plants: this will be carried out post COD.
- 3.8 Use of local labour: refer to 2.11 above. The database of all workers on site from commencement to 30 June 2013 is set out in the said report that also shows the address of each worker. No new local workers were subsequently employed.

- 3.9 Facilitating dialogue between civil society and relevant decision makers: refer to 3.5 above. Reports have been uploaded into the following website: [www.momentousenergy.com](http://www.momentousenergy.com).
- 3.10 Contamination of soil: the one incidence of limited contamination has been recorded in the ECO Report for September 2013 – refer to [Appendix 16](#) item 3.3.

#### **4. Principle 4: Action Plan and Management System**

- 4.1 The construction workers have been trained in the EMP: closed out in ESAP Report 1.
- 4.2 Adherence to EMP: refer to ECO Reports in [Appendices 12, 14, and 16](#).
- 4.3 Appointment of independent ECO: closed out.
- 4.4 I&AP Register at site: closed out.
- 4.5 ESAP Report adopted: closed out.

#### **5. Principle 5: Consultation and Disclosure**

- 5.1 Tangible record of community feedback: environmental recording book implemented – refer to 2.6 above that sets out incidents and feedback (if any).
- 5.2 Record of Community Concerns: 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**

- 6.1 A grievance book for workers has been implemented at the Project Office – closed out.
- 6.2 Worker grievances and industrial actions: refer to item 2.6.2 above that sets out an incident of worker industrial action in the current review period.

#### **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. Principle 8: Covenants**

- 8.1 Improved Outcomes: the submissions above attest to the outcomes resulting from the project to date. Local people have benefited from jobs; local businesses have

benefited from local procurement in the amount of > R20m; skills were transferred to local people during the course of the construction to date.

- 8.2 Compliance with ESAP Action Plan: the many appendices attached to this report attest to the fact that the ESAP Action Plan is being complied with.
- 8.3 Periodic Reports: the ECO has carried out environmental audits during the period under review and also submitted Compliance Reports to the Department of Environmental Affairs on a monthly basis. Refer to [Appendices 12, 14 and 16](#) below for these reports.
- 8.4 Compliance to Regulations: the level of compliance has been set forth in the ECO reports in [Appendices 12, 14 and 16](#) below.

## 9. Conclusion

Equator Principle (EP) 9, Independent Monitoring and Reporting, and EP 10, EPFI Reporting, have been duly closed out.

## 10. Appendix List

Appendix	Description
1	Servest Incident Report 05 July 2013
2	Servest Incident Report 10 July 2013
3	Juwi July ED Report
4	Juwi August ED Report
5	Environmental Tool Box Talk
6	Tool Box Talk 1 – Brand Engineering
7	Tool Box Talk 2 – Brand Engineering
8	Tool Box Talk 3 – Brand Engineering
9	Tool Box Talk 4 – Brand Engineering
10	Tool Box Talk 5 – Brand Engineering
11	Tool Box Talk 6 – Brand Engineering
12	ECO July Report
13	ECO July Report – Submission Proof
14	ECO August Report
15	ECO August Report – Submission Proof
16	ECO September Report
17	Lerumo – Certificates Issued to Local Community Workers
18	Sanitech Waste Certificate
19	Interwaste Certificate
20	MV installation Safety Report
21	Juwi September ED Report