

RUSTMO1 SOLAR FARM

ENVIRONMENTAL COMPLIANCE MONITORING REPORT

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& Momentous Energy

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1. INTRODUCTION

This report is the 06th Compliance Report for the RustMo1 PV Facility and outlines the findings of the bi-weekly environmental compliance monitoring undertaken by the ECO during the month of July 2013. Savannah Environmental, as the appointed ECO, is responsible to monitor, review, and verify compliance by the EPC Contractor (i.e. Juwi Renewable Energy), and all other contractors on site with the environmental specifications contained in the EMP, conditions of the Environmental Authorisation (EA), specific management plans, method statements and all relevant environmental policies and legislation.

2. OVERVIEW OF CONSTRUCTION PROGRESS (NOTABLE ACTIVITIES/ EVENTS)

The Construction of RustMo1 Solar Farm is still on going as planned, and all the contractors on site are successfully keeping to the construction schedule/ programme. All the pre-construction-activities were successfully completed at the outset of the project and no environmental issues were noted.

The main activities undertaken on site during this reporting period comprise:

- Laying of Solar Cable (Stringing)
- Terminations of DCBs, Inverters, Mini-Substations
- Building of Relay Room at Substation
- Building of Bundwall at Substation
- Placing of steel materials at Substation

Activities expected to be undertaken within the next month (i.e. August 2013) comprise:

- Completion of all Terminations on DCBs Inverters and Mini Substation
- Completion of Relay Room at Substation
- Construction of the OPS building

As all earthworks on site are completed and environmental compliance on the site is maintained, the ECO is no longer permanently on site and is undertaking bi-weekly audits in line with the approved EMP for the project. This is considered adequate due to the high level of compliance on the site.

Site monitoring was undertaken on the following dates within this reporting period: 09th /07/13, and 29th /07/2013

3. AUDIT FINDINGS

3.1. Non-conformities and Non Compliances identified during this monitoring and reporting period

Currently there is no record of Non-conformances or Non-compliances from the contractors, and Sub-contractors. All the contractors on site are currently complying with all environmental regulations, the approved EMP, and the Environmental Authorisation.

3.2. Previously recorded non-conformities not yet rectified

To date there is no record of previously recorded Non-conformities that have not been rectified / resolved.

3.3. Previously recorded non-conformities rectified during this monitoring and reporting period.

None (All previously recorded non conformities have been closed /resolved in the previous reporting periods).

3.4. Compliances and Conformances recorded to date

- » All the contractors and sub-contractors on site have their own complete spill kits (EMP ref page 36).
- » Additional chemical toilets have been delivered on site (chemical toilets for both men and women are available).
- » The proper construction waste bins have been delivered on site (waste bins for General and Recyclable, and Hazardous waste). These bins are appropriately labelled and they are not overfilled. The hazardous waste bins are properly sealed.
- » All the Contractors on site are keeping to their demarcated area of work and they have not disturbed anything outside the development footprint.
- » No off-roading from agreed access roads is happening on site, as most of the workers are moving on foot from one area of work to another.
- » The emergency assembly point has been implemented on site and signage for an emergency assembly point has been erected. All the contractors on site have all required safety equipment.
- » Signage for a designated smoking area has been erected on site.
- » All contractors on site have all required safety equipment for fire fighting.
- » There is good communication between the client, Contractors and, Sub-contractors as well as the ECO. This is considered advantageous to the progress of the project.

- » Housekeeping is well maintained on site. There is no littering on site.
- » All open trenches for the substation foundations on site have been barricaded.

3.5. Measures implemented to avoid /reduce impacts on the environment

The following measures have been implemented to reduce the impacts on the environment:

- » Environmental Training/ induction is communicated to the construction workers on site as part of environmental awareness.
- » There is a designated smoking area on site to reduce the chance or risk of fire outbreak on site (fire extinguishers also available on site).
- » Spill packs are made available on site to reduce/avoid any fuel spillages from construction machinery /vehicles.
- » Construction waste bins are not overfilled to prevent/ minimise pollution on site.
- » Construction workers are keeping to their demarcated area of work and agreed access roads to reduce/avoid disturbance to the surrounding environment not falling within the development footprint.
- » Ablution facilities (in the form of chemical toilets) are made available to construction workers on site
- »

3.6. Outstanding matters

There are no outstanding matters for the month of July 2013. All the outstanding matters for previous months have been closed, and the contractors are currently complying with the EMP, EA and all South African environmental legislation.

4. ENVIRONMENTAL MONITORING RECORD OF OBSERVATIONS

4.1. Waste Management

Appropriate measures in the form of adequate waste bins and chemical toilets are being taken to manage construction waste that may be generated during construction work. The construction waste bins have been placed within a designated area and are appropriately labelled. Sanitech and Coastal Hire (waste management contractors) service the waste bins and chemical toilets on a weekly basis.

4.1.1 Solid Waste (domestic/general)

Precautions are being taken to manage general wastes that may be generated during construction work in the form of waste skips and wheelie bins that have been delivered on site. General waste generation is currently low at Rustmo1 Solar Farm and no signs of pollution are evident on site.

4.1.2 Liquid Waste

Precautions are being taken to manage liquid sewage waste in the form of chemical toilets that have been delivered on site. These chemical toilets are accessible for all construction workers and the following waste management companies service them on a regular basis: Sanitech and Coastal Hire. There are enough toilets on site for both men and women. Sewage waste generation is currently low and no signs of pollution are evident.

4.1.3 Hazardous Waste

Actions have been taken to manage oil and diesel spills in the form of drip trays that are placed under the construction vehicles when not operated. At present, no major hazardous spillage has occurred on site. Spill kits and drip trays are available on site at all times. All the Sub-contractors have their own drip trays and spill packs.

4.2. Ecosystem Conservation

4.2.1 Flora

No protected species have been identified within the area of development during pre-construction activities. No plants that have been cleared on site were identified as protected or endangered, but they are indigenous to the area of work. According to the client, actions will be taken to plant more species of indigenous plants on the nearby areas as part of the rehabilitation after construction has been completed. This will be done with assistance from the ECO.

4.2.2 Fauna and Avi fauna

No animal was observed on site (RustMo1) during the reporting month of July 2013. However, there is evidence of some guinea fowl bird species and small herbivores such as duiker and rabbits, which were observed at the beginning of the project during site establishment activities.

The ECO has advised the contractor and Sub-contractors that no animal may be hunted, trapped or killed on site for any purpose whatsoever (Ref: EMP Page 31 (control impacts on ecology)).

4.2.3 Water Management

A water permit from the Department of Water Affairs has been issued regarding the use of water from the borehole as construction progresses. An access road to the borehole has been constructed. The Contractor (Finishing Touches) has completed the trenching for the placement of the water pipeline from the borehole to the solar farm.

4.2.4 Soil Management

Currently no soil has been stockpiled on site, and all the excess soil that was stockpiled in the previous month has been used to fill in the eroded area on the farm near Marikana Platinum Mine. The ECO has received a signed formal agreement letter between the landowner and the contractor, Brand Engineering, regarding the re-use of soil for filling in the eroded area.

4.3. Heritage

Although limited heritage sites were noted on the proposed development site, it is possible that sites could be uncovered during excavation activities associated with construction (Ref: EMP Page 34). However, no new heritage artefacts/objects have been uncovered on site during the construction work to date, and the contractors have not disturbed any of the already known heritage sites (e.g. gravesite) within or close to the development footprint.

Through environmental awareness toolbox talks prepared by the ECO and communicated on site, the Contractors have been made fully aware that if at any stage during the construction phase any archaeological artefact is uncovered, the work in the vicinity of the finding should be stopped immediately and the finding should be reported to the South African Heritage Resources Association and/or a professional archaeologist as soon as possible so that appropriate mitigation measures can be implemented (Ref: EMP page 34; EA - Scope of authorisation Point 10).

4.4. Social

4.4.1. Public Involvement

Approximately 80% of workers at RustMo1 are from the local communities, and the public involvement is notable through the regular informative meetings they have with the community liaison officer (CLO) for RustMo1.

The Contractor Brand Engineering hired an additional 59 temporary labour workers from local communities from the 15th /07/2013 to 26th /07/2013.

4.4.2. Complaints and claims for damage

No complaints or claims for damage were received during this reporting period; however, a copy of complaints register for the month of July 2013 has been attached to this report as Appendix A.

Any complaints from Interested and affected parties will be recorded in the I&AP Complaints register and a copy will be available on site at all times.

4.4.3. Landowner issues

No issues of concern from the landowners were recorded during the month of July 2013

4.5. Rehabilitation

All the disturbed areas associated with the construction activities will be rehabilitated upon the completion of all construction activities. According to the client, actions will be taken to plant more species of indigenous plants on the nearby areas as part of the rehabilitation after construction has been completed, and this will be done with assistance from the ECO

5. PROTECTIVE MEASURES

The EPC Contractor, Juwi Renewable Energy, and all the Sub-contractors on site, have implemented the following protective measures on site.

- » The security contractor (Servest Security) is responsible for ensuring the safety of all stored equipment on site, as well as the security for all construction workers. Access to the site is controlled.
- » All the construction workers on site are easily identified and are required to wear appropriate Personal Protection Equipment (PPE), which includes safety boots, earplugs, reflector vests, and hard hats.

- » Barricading is in place for all the open trenches on site in order to protect animals and anyone working on site from falling into the opened trenches.
- » The emergency assembly point, and designated smoking area has been implemented on site, and signage erected respectively for each of the designated area.
- » The Safety officer also communicates the Emergency Evacuation Procedure to all construction workers. The Evacuation plan is kept in the office of the Safety officer.
- » Fire fighting equipment (e.g. fire extinguishers, and fire beaters) is present on site
- » Dust Suppression is done on the weekly basis on internal access road to the OPS Building.

6. INFRASTRUCTURE MANAGEMENT

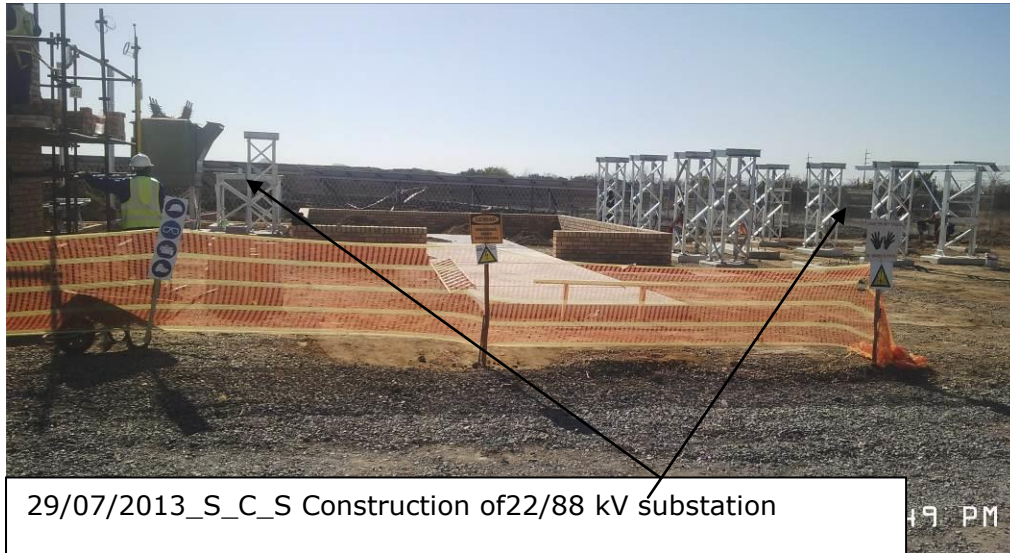
The contractor Beaulac Electrical has finished with the installation of DCBs, Inverters, Mini-Substations of solar panels, and they are busy with the terminations of all DCBs, Inverters, and Mini-Substations of solar panels: Refer to Figure 1 below.

Figure 1: DC- AC Converter and Mini Substation



The subcontractor Pambele is currently undertaking the construction of the 22/88KV substation. Refer to Figure 2 below.

Figure 2: Construction of 22/88kV Substation



7. ENVIRONMENTAL AWARENESS AND TRAINING

Environmental awareness at RustMo1 is achieved through the undertaking of regular environmental toolbox talks, inductions, and SHE (Safety & health, and Environment) weekly meetings. The table below indicates the major environmental awareness toolbox talks, which were communicated to RustMo1 construction workers on site during this reporting period.

| DATE | TOOLBOX TOPIC | VENUE |
|------------|-----------------------------------|--------------------|
| 01/07/2013 | Environmental policy | RustMo1 Solar Farm |
| 08/07/2013 | Spillage response | RustMo1 Solar Farm |
| 15/07/2013 | Spillage reponse waste Management | RustMo1 Solar Farm |
| 22/07/2013 | Pollution control | RustMo1 Solar Farm |
| 29/07/2013 | Trenching | RustMo1 Solar Farm |

8. NON-COMPLIANCE AND CONTRACTOR COMMUNICATIONS

There are no issues of non-compliance for this reporting period. The communication between the client, ECO, and the contractor remains good.

9. INCIDENTS

No environmental incidents were recorded during this reporting period; however, a copy of environmental incident register has been attached to this report as

Appendix B. Another copy of this environmental incident register is kept on the ECO file.

10. MEETINGS AND CORRESPONDENCE

| DATE | MEETING/CORRESPONDENCES | VENUE |
|------------|--|--------------------|
| 02/07/2013 | SHE Weekly Meeting | RustMo1 Solar Farm |
| 09/07/2013 | SHE Weekly Meeting | RustMo1 Solar Farm |
| 16/07/2013 | SHE Weekly Meeting | RustMo1 Solar Farm |
| 22/07/2013 | SHE Weekly Meeting | RustMo1 Solar Farm |
| 29/07/2013 | Internal Environmental Audit(Brand Engineering, and Pambele) Refer to Appendix D | RustMo1 Solar Farm |
| 29/07/2013 | Safety internal Audit(Brand Engineering) | RustMo1 Solar Farm |
| 30/07/2013 | SHE Weekly Meeting | RustMo1 Solar Farm |

11. OVERVIEW OF ENVIRONMENTAL PERFORMANCE

Percentage overall environmental performance is reflected in the environmental audit checklist (refer to Appendix C) that clearly reflects on the contractor's performance on individual activities. It is important to note that the attached checklist for construction activities has been compiled with reference to the approved EMP and Environmental Authorisation for RustMo1, as well as all the relevant environmental regulations of South Africa. The overall environmental performance as calculated in the attached audit checklist stands at 99.8%

Each element in the attached environmental compliance-monitoring checklist is scored on the following basis:

- » Score 3 : best practice/full compliance,
- » Score 2 : satisfactory (>50% compliance),
- » Score 1 : unsatisfactory (<50% compliance),
- » Score 0 : nothing in place and
- » Score N/A : not applicable at this time.

12. CONCLUSIONS AND RECOMMENDATIONS

To date the ECO is satisfied with the level of environmental performance for Rustmo1. All the construction activities on site are undertaken with careful consideration of their impacts on the environment. The contractors have developed specific and carry-over environmental method statements for all of their construction activities on site. There is a good level of communication

between the ECO, Contractors, and the Client. This is considered advantageous to the progress of the project. The contractors on site make use of all the advice and recommendations they receive from the ECO, and that assists to avoid/minimise non-compliances on site and to inform the resolution/rectification of a Non-conformance if it occurs.

The ECO recommends that all the contractors on site should strive to maintain this level of environmental performance to avoid/minimise any possibilities of Non-compliances as the construction progresses.

Dakalo Nemalegeni (ECO) of Savannah Environmental prepared this report for RustMo1 Solar Farm.