

**THE PROPOSED DEVELOPMENT OF A 3.15 MW SOLAR
PHOTOVOLTAIC FACILITY ON THE REMAINDER OF
FARM BROODKRAAL NO. 154, PIKETBERG
(SWARTLAND).**

**EXTERNAL ENVIRONMENTAL AUDIT REPORT IN TERMS
OF REGULATION 34 OF THE NEMA EIA REGULATIONS,
2014 (AS AMENDED).**

DEA&DP EIA REF. NO. 16/3/3/1/F5/25/2028/23
NEAS REF. NO. WCP/EIA/0001307/2023



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KAPPEC

08 January 2025

DETAILS OF THIS REPORT

Status of this Report	Final Regulation 34 External Compliance Audit Report
Date Submitted	08 January 2025
Public Review Period	Not Applicable
Report Title	Proposed Development of a 3.15 MW Solar Photovoltaic Facility on the Remainder of Farm Broodkraal No. 154, Piketberg (Swartland).
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 The logo for KAPP Environmental Consultants features a stylized green leaf and blue water droplet icon to the left of the word 'KAPP' in large, bold, dark grey letters. Below 'KAPP' is the text 'ENVIRONMENTAL CONSULTANTS' in a smaller, all-caps, dark grey font.	

DISCLAIMER

This report has been prepared for Le Roux Group (Broodkraal Landgoed (Pty) Ltd.) represented by Mr. G. de Beer and is subject to and issued in accordance with the agreement with Kapp Environmental Consultant (Pty) Ltd. (KAPPEC).

The opinions expressed in this report have been based on the information supplied to KAPPEC by the Client and the relevant Environmental Assessment Practitioner. The Author has exercised all due care in reviewing the supplied information, but conclusions from the review are reliant on the accuracy and completeness of the supplied data. KAPPEC does not accept responsibility for any errors or omissions in the supplied information and does not accept any consequential liability arising from commercial decisions or actions resulting from them. KAPPEC accepts no liability or responsibility whatsoever for it in respect of any use of or reliance upon this report by any third party.

Opinions presented in this report apply to the site conditions and features as they existed at the time of the writing of this report, and those reasonably foreseeable.

Copying of this report without the permission of the Client and KAPPEC is not permitted.

LETTER OF UNDERTAKING AND STATEMENT OF INDEPENDENCE

I Renier Kapp, as the appointed independent Environmental Assessment Practitioner (EAP) hereby declare that I:

- Will perform the work relating to the appointment in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- Other than fair remuneration for work performed/to be performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity;
- Work performed for this study was done in an objective manner irrespective of how such findings may be favourable or not to the applicant;
- declare that there are no circumstances that may compromise my objectivity in performing such work;
- All facts and findings will be presented in an objective manner in accordance with my professional experience and information derived from the study;
- have expertise in conducting the independent audit, including knowledge of the relevant legislation and any guidelines that have relevance to the development; and
- All particulars furnished in this report are true and correct.



(Renier Kapp)

Signature of the Principle Environmental Assessment Practitioner

Kapp Environmental Consultants (Pty) Ltd

Name of Company

08 January 2025

Date

CONTENTS

INTRODUCTION.....	2
PROJECT DESCRIPTION	3
LISTED ACTIVITIES	4
CONDITIONS OF AUTHORISATION.....	9
SITE AUDIT FINDINGS	15
CONCLUSION.....	37
ANNEXURE A – SITE PHOTOGRAPHS.....	38

LIST OF FIGURES

FIGURE 1: LOCALITY MAP.....	7
FIGURE 2: SITE DEVELOPMENT PLAN.....	8

LIST OF TABLES

TABLE 1: COMPLIANCE RATING	2
TABLE 2: ENVIRONMENTAL AUTHORISATION GENERAL CONDITIONS AND COMPLIANCE	9
TABLE 3: ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE	16

ABBREVIATIONS

MMP	Maintenance Management Plan
DEFF	Department of Environment, Forestry and Fisheries
DWS	Department of Water Affairs and Sanitation
EA	Environmental Authorization
EAP	Environmental Assessment Practitioner
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMP	Environmental Management Programme
DEO	Designated Environmental Officer
KAPPEC	Kapp Environmental Consultants
I&AP	Interested and Affected Parties
RE	Resident Engineer

APPENDICES

Appendix A:	Site Photographs
Appendix B:	Site Development Plan
Appendix C:	Copy of EA
Appendix D:	Copy of EMPr
Appendix E:	Commencement Notification and I&AP Database
Appendix F:	ECO reports
Appendix G:	Method Statements

INTRODUCTION

Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed by Le Roux Group (Broodkraal Landgoed (Pty) Ltd.) (the Applicant) as the independent environmental assessment practitioners to undertake an external compliance audit in fulfilment of Condition 13 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).

An Environmental Authorisation (EA) was granted to the Le Roux Group on April 15, 2024 (DEA&DP EIA Ref: 16/3/3/1/F5/25/2028/23) in terms of the National Environmental Management Act, 1998 (Act 107 Of 1998) and The Environmental Impact Assessment Regulations, 2014 (as amended). This external audit, conducted in alignment with the National Environmental Management Act (NEMA), is to increase the contractor's compliance rating in terms of the approved Environmental Authorization and the EMP. The body of this report will incorporate the auditable conditions and requirements contained in both the EA and the EMP. The conditions of the EA have been summarized in the report including its corresponding level of compliance with each condition.

The methodology followed for conducting the environmental audit included:

- Compilation of background information for site visit
- Site Visit (7 November 2024)
- Documentation audit
- Compilation of environmental audit report
- Submission of environmental audit report (08 January 2025)

The items have been included in table format and compliance will be indicated based on assigned colour significance as per Table 1 below:

TABLE 1: COMPLIANCE RATING

Colour	Compliance Rating Significance
GREY	A grey item indicates that a compliance rating is not relevant. Item is listed for awareness although will not/cannot be rated.
GREEN	An item is marked green to indicate complete compliance in line with the EMP.
YELLOW	An item is marked yellow to indicate sufficient compliance although possibly not as prescribed in the EMP.
ORANGE	An item is marked orange to indicate a non-compliance although the resulting impact is not deemed significant.
RED	An item is marked red to indicate a significant or ongoing non-compliance which needs to be addressed as per the EAP instruction.

PROJECT DESCRIPTION

The proposed project involves the construction of a solar photovoltaic (PV) facility on the remainder of Farm Broodkraal No. 154, located near Piketberg in the Swartland region. This facility is designed to generate approximately 3.15 MW of electricity, which will be used to power the existing packhouses and coolers on Broodkraal farm, directly supporting increased agricultural productivity.

- **PV Array and Infrastructure:**
 - The facility will comprise approximately 6,912 solar modules arranged in a portrait orientation across 72 tables in three rows.
 - Each table will have a clearance height of approximately 600 mm to allow for optimal positioning and maintenance access.
 - The total development footprint will span approximately 3.6 hectares.
- **Power Transmission and Connectivity:**
 - The electricity generated will connect to an existing 11kV powerline and substation on-site, facilitating efficient energy transmission.
 - Power will be conveyed to nearby Broodkraal farm infrastructure through established powerline corridors, minimizing the need for additional powerline construction.
- **Site Access and Location:**
 - Site access will be provided via the R399 near the community of Wittewater.
 - The development area is bordered to the north by utility infrastructure, including electrical and water storage facilities, while farm worker housing, agricultural sheds, and the Berg River are located farther north. Previously cultivated fields lie to the south and east.

The PV facility will be situated on an unused portion of agricultural land that has been previously transformed from its natural state due to historical ploughing, most recently in 2022. Although the land is uncultivated, past agricultural activities have had a lasting impact on the site's vegetation and soil seed bank. The development site is located outside any urban areas, situated near table grape fields with shade netting, and adjacent to existing utility infrastructure.

This solar PV development aligns with Broodkraal farm's commitment to sustainable practices by leveraging renewable energy to power its agricultural operations, optimizing productivity, and minimizing the environmental footprint by using existing powerlines and infrastructure.

LISTED ACTIVITIES

The Amended EA subsequently authorised the applicant to undertake the underneath **listed activities**:

Listing Notice 1 of the NEMA EIA Regulations, 2014 (as amended):

Activity 1:

Activity Description:

The development of facilities or infrastructure for the generation of electricity from a renewable resource where—

- (i) the electricity output is more than 10 megawatts but less than 20 megawatts; or
- (ii) the output is 10 megawatts or less but the total extent of the facility covers an area in excess of 1 hectare;

excluding where such development of facilities or infrastructure is for photovoltaic installations and occurs -

- (a) within an urban area; or
- (b) on existing infrastructure.

The proposed development of a solar photovoltaic facility on the remainder of Farm Broodkraal No. 154, Piketberg (Swartland) will result in the generation of 3.15MW of electricity from a renewable resource with a development footprint of approximately 3.6 hectares in extent outside an urban area.

Activity 28:

Activity Description:

Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development:

- (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or
- (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare;

excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.

The proposed development of a solar photovoltaic facility on the remainder of Farm Broodkraal No. 154, Piketberg (Swartland) will result in an industrial development on land that was used for agriculture purposes on or after 01 April 1998 outside an urban area on land bigger than 1 hectare.

REGULATION 34 EXTERNAL AUDIT REQUIREMENTS

This section will attempt to detail the content requirements to be included as part of a Regulation 34 Audit Report as outlined in terms of Appendix 7 of Regulation 982 of the 2014 EIA Regulations.

Environmental audit report

The environmental audit report must provide recommendations regarding the need to amend the EMPr, and where applicable, the closure plan.

Objective of the environmental audit report

The objective of the environmental audit report is to

- a) report on –
 - i. the level of compliance with the conditions of the environmental authorisation and the EMPr, and where applicable, the closure plan; and
 - ii. the extent to which the avoidance, management and mitigation measure provided for in the EMPr, and where applicable, the closure plan achieve the objectives and outcomes of the EMPr, and closure plan;
- b) identify and assess any new impacts and risks as a result of undertaking the activity;
- c) evaluate the effectiveness of the EMPr, and where applicable, the closure plan; and
- d) identify shortcomings in the EMPr, and where applicable the closure plan, and
- e) identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr, and where applicable, the closure plan.

Content of environmental audit reports

(1) An environmental audit report prepared in terms of these Regulations must contain –

- a) details of the –
 - i. independent person who prepared the environmental audit report; and
 - ii. expertise of the independent person that compiled the environmental audit report;
- b) a declaration that the independent auditor is independent in a for as may be specified by the competent authority;
- c) an indication of the scope of, and purpose for which, the environmental audit report was prepared;
- d) a description of the methodology adopted in preparing the environmental audit report;
- e) an indication of the ability of the EMPr, and where applicable, the closure plan to –
 - i. sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis;

- ii. sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility; and
 - iii. ensure compliance with the provisions of environmental authorisation, EMPr, and where applicable, the closure plan;
- f) a description of any assumptions made, and any uncertainties or gaps in knowledge;
- g) a description of any consultation process that was undertaken during the course of carrying out the environmental audit report;
- h) a summary and copies of any comments that were received during any consultation process; and
- i) any other information requested by the competent authority.

Additional Content of Environmental Audit Reports

According to the issued EA, the following should be addressed in addition to the minimum requirements as set out above.

15. In accordance with the recommendation provided in the Visual Impact Assessment compiled by David Gibbs and dated 26 June 2023), and as included in the EMPr, tall vegetation must be **planted along the boundary of the site during the construction phase** to form a visual screen.

15.1. The **establishment and maintenance of the visual screen** must be reported on as part of the environmental audit reports to be submitted to the competent authority.

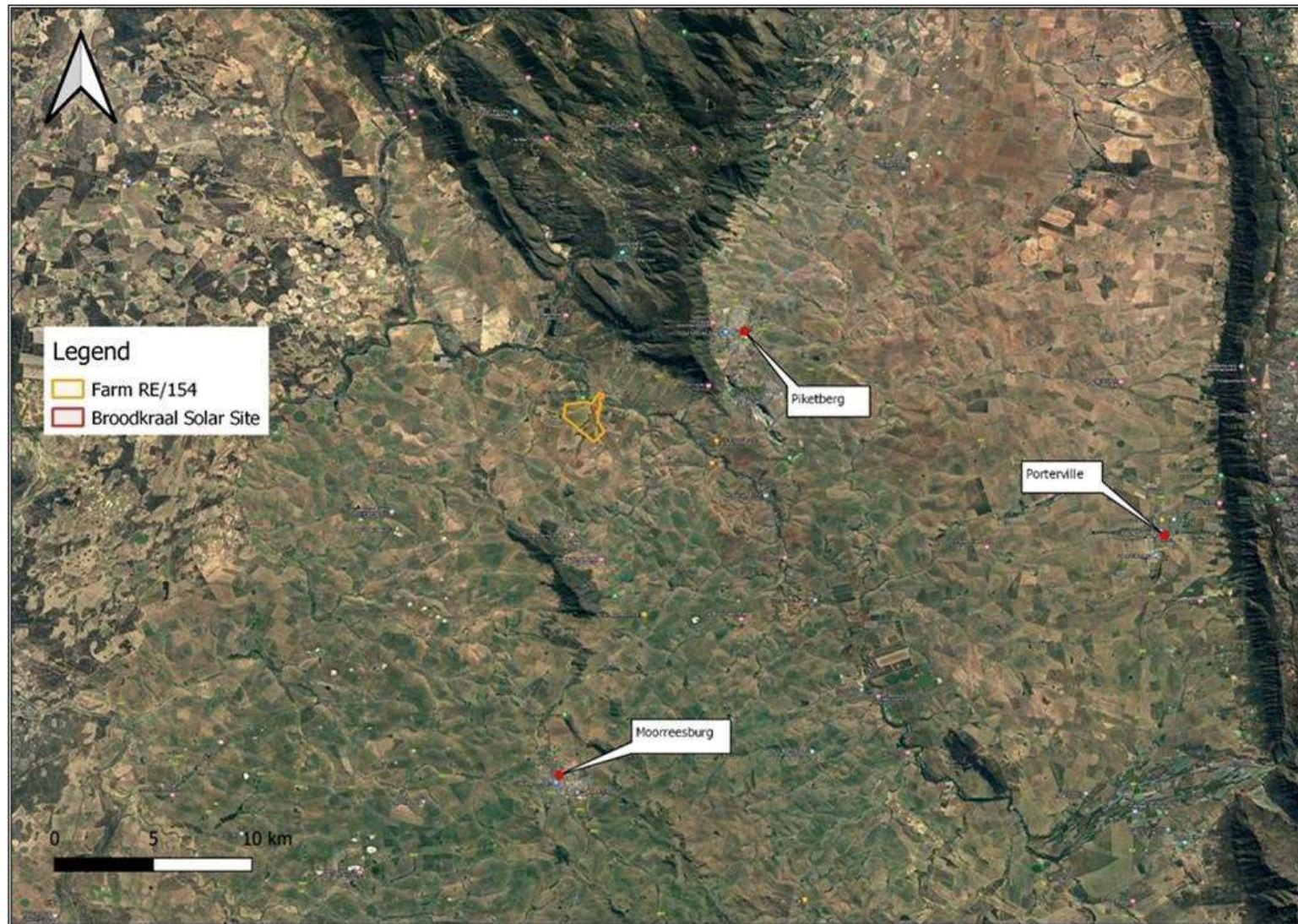


FIGURE 1: LOCALITY MAP

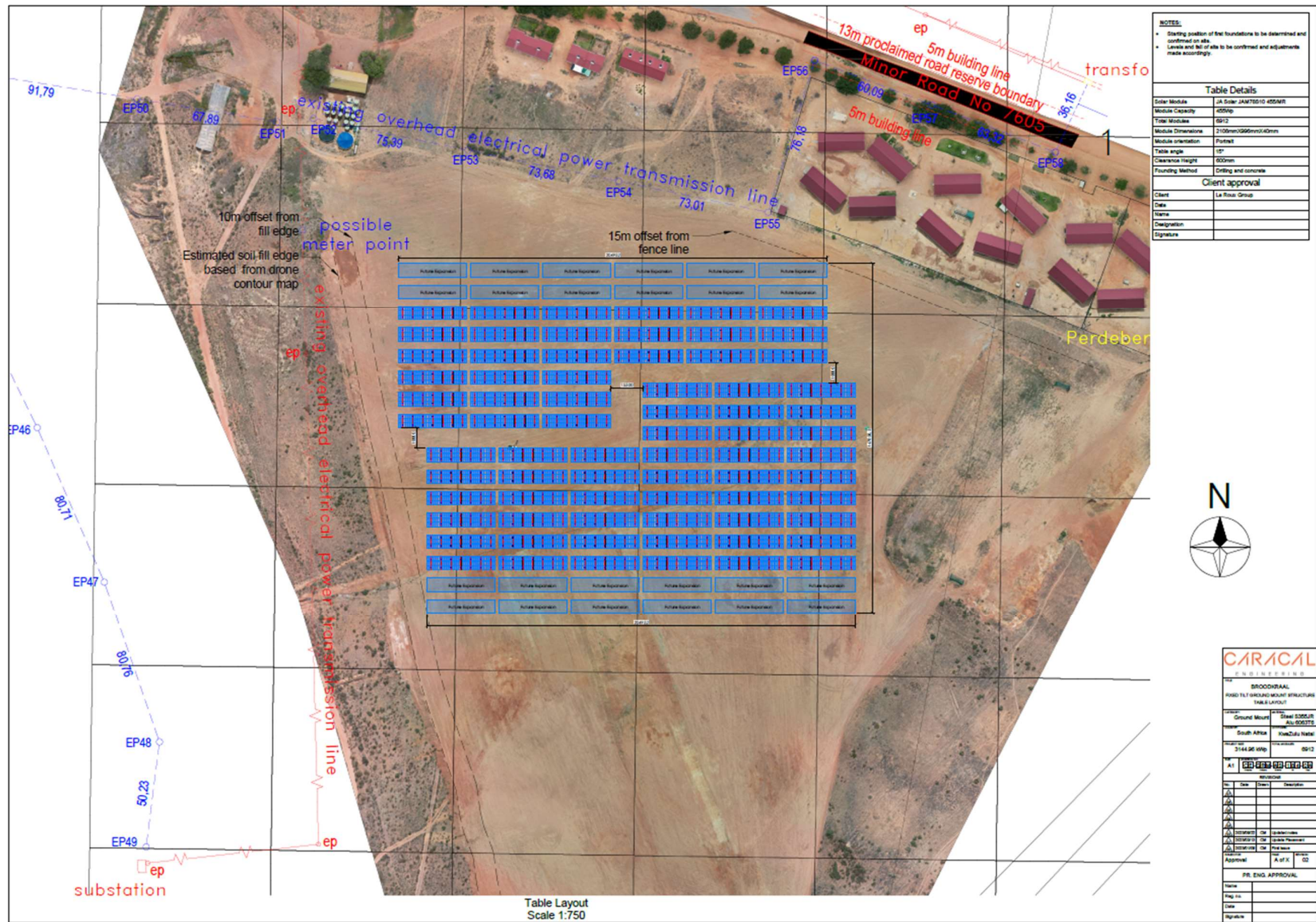


FIGURE 2: SITE DEVELOPMENT PLAN

CONDITIONS OF AUTHORISATION

TABLE 2: ENVIRONMENTAL AUTHORISATION GENERAL CONDITIONS AND COMPLIANCE

No.	EA CONDITIONS	COMPLIANCE FINDING
1.	Scope of authorisation The holder is authorised to undertake the listed activities specified in Section B above in accordance with and restricted to the Preferred Alternative described in Section B above and in the BAR dated November 2023 on the site as described in Section C above.	The preferred alternative, as authorised, is being implemented on site.
2.	The holder must commence with, and conclude, the listed activities within the stipulated validity period, which this Environmental Authorisation is granted for, or this Environmental Authorisation shall lapse and a new application for Environmental Authorisation must be submitted to the competent authority. This Environmental Authorisation is granted for – (a) A period of five (5) years, from the date of issue, during which period the holder must commence with the authorised listed activities; and (b) A period of ten (10) years, from the date the holder commenced with the authorised listed activities, during which period the authorised listed activities for the construction phase, must be concluded.	A letter to notify the department of the intended commencement of activities was submitted to the Department on 24 July 2024. The holder commenced with construction in August 2024, and the EA was granted on the 15th of April, thus within 5 years.
3.	The holder shall be responsible for ensuring compliance with the conditions by any person acting on his/her behalf, including an agent, sub-contractor, employee, or any person rendering a service to the holder.	Noted, the holder holds all responsibility for the actions undertaken by anyone on site.

4.	Any changes to, or deviations from the scope of the alternative described in section B above must be accepted or approved, in writing, by the Competent Authority before such changes or deviations may be implemented. In assessing whether to grant such acceptance/approval or not, the Competent Authority may request information in order to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the holder to apply for further authorisation in terms of the applicable legislation.	Noted. No changes or deviations from the scope of the alternative described in section B of the EA has occurred on site.
5.	Written notice to the Competent Authority A minimum of seven (7) calendar days' notice, in writing, must be given to the Competent Authority before commencement of the development activity. 5.1. The notice must make clear reference to the site details and EIA Reference number given above. 5.2. The notice must also include proof of compliance with the following conditions described herein: Conditions: 6, 7, 10 and 14.	A notification of commencement was sent to DEA&DP on the 24th of July 2024 and made clear reference to the site details and EIA Reference, it also included proof/comments of compliance with conditions 6, 7, 10 and 14. Please refer to proof of EA conditions below. Condition 6: The EA was issued on the 15th of April 2024, and the I&APs were notified of the EA on the 17th of April 2024, thus within 2 days from the EA was issued. Condition 7: The listed activities have not commenced within 20 days from the date of issue of the EA. Condition 10: Guillaume Nel Environmental Consultants (GNEC) has been appointed as the Environmental Control Officer (ECO) to conduct fortnightly audits on compliance in terms of the EA and the Environmental Management Programme (EMPr). Condition 14: The riparian area in the western boundary has been identified and demarcated, proofs to be included in the first ECO report.

6.	Notification and administration of appeal The holder must in writing, within fourteen (14) calendar days of the date of this decision – 6.1. Notify all registered Interested and Affected Parties (“I&APs”) of – 6.1.1. the outcome of the application; 6.1.2. the reasons for the decision as included in Annexure 3; 6.1.3. the date of the decision; and 6.1.4. the date when the decision was issued. Draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, 2014 (as amended) detailed in Section G below; 6.3. Draw the attention of all registered I&APs to the manner in which they may access the decision; and 6.4. Provide the registered I&APs with: 6.4.1. The name of the holder (entity) of this Environmental Authorisation; 6.4.2. The name of the responsible person for this Environmental Authorisation; 6.4.3. The postal address of the holder; 6.4.4. The telephonic and facsimile details of the holder; 6.4.5. The e-mail address, if any, of the holder; and 6.4.6. The contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the National Appeal Regulations, 2014 (as amended).	The I&AP Notification letter after the approval of the EA was sent on the 17th of April 2024 (2 days after the EA was granted). All of the information required in this condition was provided as stipulated. A copy of the Notification letter is herewith included as Appendix E.
7.	The listed activities, including site preparation, must not commence within twenty (20) calendar days from the date the holder notifies the	The holder commenced with the approved listed activities in August 2024, 4 months after notifying the registered I&APs of

	registered I&APs of this decision. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided i.e. the listed activities, including site preparation, must not commence until the appeal is decided.	the decision. (The I&APs were notified on the 17 th of April 2024, and the letter of commencement for site preparation was sent on the 24 th of July 2024). No appeals were lodged against the EA.
8.	Management of activity The Environmental Management Programme ("EMPr") (compiled by Guillaume Nel Environmental Consultants and dated 04 November 2023) submitted as part of the application for Environmental Authorisation is hereby approved and must be implemented.	Noted. A copy of the EMPr is available on-site as part of the environmental file, and the contractor is aware of the requirements.
9.	The EMPr must be included in all relevant contract documentation for the applicable phases of implementation.	The Holder of the EA is also the contracts manager. A letter stating the EMPr will be implemented on site has been signed as is included in the environmental file on site.
10.	Monitoring The holder must appoint a suitably experienced environmental control officer ("ECO"), or site agent where appropriate, before the commencement of any land clearing or development activities to ensure compliance with the provisions of the EMPr and the conditions contained in this Environmental Authorisation.	Nica Kotze from Guillaume Nel Environmental Consultants was appointed as ECO on the site and have compiled monthly ECO reports to DEA&DP.
11.	A copy of the Environmental Authorisation, EMPr, Environmental Audit Reports and compliance monitoring reports must be kept at the site of the authorised activities during the development activities thereafter it must be kept at the office of the holder and must be made available to any authorised person on request.	An environmental file is available on-site and includes all the necessary documentation (EA, EMPr, Method Statements, as well as the ECO monitoring requirements).
12.	Access to the site referred to in Section C above must be granted, and the environmental reports mentioned above must be produced, to any authorised official representing the Competent Authority who requests to see it for the purposes of assessing and/or monitoring	Access to the site referred to in Section C is available, and the environmental reports are available from the project manager on the farm.

	compliance with the conditions contained herein.	
13.	Auditing In terms of Regulation 34 of the NEMA EIA Regulations, 2014 (as amended), the holder must conduct environmental audits to determine compliance with the conditions of the Environmental Authorisation and the EMPr and submit Environmental Audit Reports to the Competent Authority. The Environmental Audit Report must be prepared by an independent person with the relevant environmental auditing expertise and must contain all the information required in Appendix 7 of the NEMA EIA Regulations, 2014 (as amended). 13.1. The holder must undertake an environmental audit within three (3) months of the commencement of the listed activities and submit an Environmental Audit Report to the Competent Authority one (1) month after the completion of the environmental audit. 13.2. An Environmental Audit Report must be submitted to the Competent Authority every two (2) years for the duration of the development/construction phase. 13.3. A final Environmental Audit Report must be submitted to the Competent Authority within three (3) months of the completion of the construction/development phase. 13.4. The holder must, within seven (7) days of the submission of the Environmental Audit Reports to the Competent Authority, notify all potential and registered I&APs of the submission and make the Environmental Audit Report available to any I&APs upon request.	Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed by the Le Roux Group (the Applicant) as the independent environmental assessment practitioners to undertake the required 3 months external compliance audit in fulfilment of Condition 13 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended). The I&AP's will be notified within 7 calendar days after the submission of the external audit report to the Competent Authority.
14.	Specific Conditions The riparian habitat of the delineated watercourse (i.e. unnamed tributary of the Berg River) located along the western boundary of the proposed site must be demarcated as a "no-go" area prior to the	Large no-go stakes were painted and planted at intervals to demarcate the area prior to construction and were still clearly in place at the time of the external audit. <i>Please also refer to the EMPr findings and the photo pages in this regard.</i>

	commencement of development activities and must remain visible for the duration of the construction phase of the proposed development.	
15.	In accordance with the recommendation provided in the Visual Impact Assessment (compiled by compiled by David Gibbs and dated 26 June 2023), and as included in the EMPr, tall vegetation must be planted along the boundary of the site during the construction phase to form a visual screen. 15.1. The establishment and maintenance of the visual screen must be reported on as part of the environmental audit reports to be submitted to the competent authority.	The applicant has planted <i>Syzygium</i> which is an indigenous shrub and commonly used for hedging and screening which would provide sufficient visual screening. The trees are still small in size.
16.	An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate avoidance, reduction, recycling, treat, reuse and disposal where appropriate.	The site was in good, clean, and neat condition, no rubble or litter was observed during the site audit. Minimal litter is generated, and large bags are available on site for the removal of packaging material.
17.	Surface, storm, or groundwater must not be polluted due to any actions on the site. The applicable requirements with respect to relevant legislation pertaining to water must be met.	Several groundwater trenches have been constructed throughout the site to contain and is diverted away from the site towards the west in the direction of the unnamed tributary. No pollution of surface, or groundwater should occur on site based on the observations during the site audit.
18.	Dust suppression measures must be used to mitigate dust during the construction phase. No potable water must be used to mitigate dust nuisance. Alternative dust suppression methods (such as shade netting screens and/ or straw stabilisation, etc.) must be implemented instead.	At the time of the audit, it was noted that a watering bowser and truck was available on site. The access roads surrounding the site was watered (<i>please refer to the photo pages</i>) and a rotating movable sprayer was also noted within the site for dust suppression within the working areas. Water pipelines have also been installed between the panel rows.
19.	Employment opportunities must be afforded to the local community (as far as possible) during all phases of the proposed development.	It is understood that most of the workers are local employees of the applicant (Broodkraal Landgoed) and the contractor.

SITE AUDIT FINDINGS

The detailed walkthrough site visit was conducted on the 7th of November 2024 to assess the progress of the ongoing construction activities in line with Condition 13 of the environmental authorization. The auditor was accompanied on site by the contractor and the clients representative to assist in providing additional information including the environmental file on site. A large canvas tent has been erected to serve as site camp and eating area along the eastern boundary. A chemical toilet on a trailer is available withing the site and deemed sufficient for the workforce.

At the time of audit, the installation of the footings and the steel structures were underway and progressing well. Approximately 50% of the structures have been constructed or is currently in the process of being constructed. No photovoltaic (PV) panels have been installed at the time of the audit. It is understood that the bulk external electrical cabling works have been completed which includes the connection of the underground distribution cable to the ring main unit (RMU) as well as the connection from the RMU to the existing overhead 11kV distribution lines.

Stormwater trenches have been excavated within the development footprint as well as along the eastern and northern boundaries of the development (due to the site slope) for the effective management and treatment of groundwater. These channels redirect only excess groundwater away from the site footprint and away from the houses located immediately north of the site, towards the unnamed tributary located west of the site. A drainage pipe is covered with rocks and black plastic sheeting for this purpose in line with best practice.

Dust suppression is being implemented and a watering truck is available on site. The gravel access roads along the northern boundary and the main internal road were watered at the time of the audit.

Cement batching is taking place along the eastern boundary of the site. A watering cart is available at the batching to supply dam water for mixing. Cement bags are kept on a pallet and the batching takes place on an impermeable surface created underneath the cement mixer. A small excavation was made and lined with plastic builders sheeting and covered with sand. Builders sheeting is also in place for the placement of the mixed concrete.

A visual screening, per the recommendations of the VIA has been planted along the northern boundary of the site. The applicant has planted Syzygium which is an indigenous shrub and commonly used for hedging and screening which would provide sufficient visual screening. The trees are still small in size.

Along the western boundary of the site, it was noted that a 25mm water pipeline was laid in a shallow trench within the no-go area. The pipeline does not continue to the watercourse and connects to an existing water pipeline toward the east of the unnamed tributary. This pipeline connection provides the required water for the future washing of the pv panels. This pipeline has, however, encroached within the demarcated no-go area.

ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

TABLE 3: ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

No.	EMP REQUIREMENT	COMPLIANCE FINDING
1.	Site Demarcation and No-Go/Sensitive Areas	
1.1	The surveys for the overall project area and construction footprint as approved in the Environmental Authorisation (EA) must be clearly demarcated before the contractors set up their crew camps or begin construction.	Construction commenced in August 2024. The construction footprint was demarcated with droppers prior to commencement. The no-go area as identified west of the development footprint was surveyed and demarcated with 1.8m painted no-go stakes prior to commencement.
1.2	Stockpiled topsoil should be demarcated with danger tape and seen as no-go areas.	No stockpiles were observed during the site audit and no topsoil was stripped for construction purposes from the available audit reports.
1.3	These No-go areas must be demarcated with fencing/warning tape and signs before any construction activities commence. The EO and ECO must be on site in order to make sure the correct areas are fully demarcated.	The construction footprint was demarcated with droppers prior to commencement. The no-go area as identified west of the development footprint was surveyed and demarcated with 1.8m painted no-go stakes prior to commencement. The development footprint has been formally demarcated through the installation of permanent electrical wire fencing.
1.4	All construction activities must remain within the boundaries of the development area, as demarcated at the start of the construction phase. There must be no vehicular access to the drainage lines outside the development area thus reducing the infringement of the development on natural habitat.	Along the western boundary of the site, it was noted that a 25mm water pipeline was laid in a shallow trench within the no-go area. The pipeline does not continue to the watercourse and connects to an existing water pipeline toward the east of the unnamed tributary. This pipeline connection provides the required water for the future washing of the pv panels. This pipeline has, however, encroached within the demarcated no-go area.

1.5	The construction footprint must be kept to a minimum by constructing boundaries and demarcated areas not to be disturbed.	Sufficient demarcation is in place on site and a formal electrical fence around the development footprint has been erected. External ancillary activities required, including the waterline connections, and the connection of the electrical cable to the RMU has been completed. All remaining works are to be conducted within the formal footprint.
2.	Flora	
2.1	Locally indigenous plants must be used in the landscaping of the site.	As per condition 15 of the EA, tall vegetation must be planted along the boundary of the site during the construction phase to form a visual screen. The developer has planted <i>Syzygium</i> hedging, the hedges are indigenous and would supply sufficient visual screening in time.
2.2	Plants that are proclaimed as problem plants or noxious weeds must be excluded from the landscaping plan and these must be removed immediately, should they occur on site.	No invasive alien plants were observed within the rehabilitation and development area.
2.3	No plants/trees may be destroyed prior to notify the ECO about the plan. The ECO is to approve all plants to be removed.	No indigenous trees or plants have been destroyed outside the approved development area, which comprised a disturbed area.
2.4	The contractor must rehabilitate the construction camp and any other disturbed areas once construction activities have terminated. Compacted areas will be ripped and mulched in order to ensure recovery of the natural vegetation cover.	During the site audit, <i>Syzygium</i> hedging was planted to provide vegetation screening. All other rehabilitation efforts will begin after construction is completed.
2.5	Once construction is complete, rehabilitation of un-built areas must be undertaken in order to restore the aesthetic & ecological value of the area. It is recommended that a qualified landscape architect, qualified botanist, aquatic specialist and the ECO be consulted with regard to the most appropriate rehabilitation vegetation and structures, where agricultural land uses are not proposed. Active	To be audited once construction activities have been completed.

	re-vegetation must take place with locally indigenous vegetation under the supervision of the ECO.	
2.6	No open fires shall be allowed on site under any circumstances, fires will only be permitted in adequate facility within the crew camp, Forest Act, 1984 (Act No. 122 of 1984).	No evidence of fires were observed during the site audit. A method statement was provided for fire management, included in Appendix G.
3.	Stockpiles	
3.1	All stockpiled material must be easily accessible on site without any environmental damage of the surrounding properties.	Excavated material was placed on one side of the trenches which will be backfilled once stormwater measures are completed, and electrical wiring has been laid. Material stockpiles used for cement batching are located next to the site camp. Structural material is stored in the middle of the development footprint for easy access.
3.2	All temporarily stockpiled material must be stockpiled in such a way that the spread of materials is minimised. In the case of strong wind and/or rain all stockpiled material must be covered with a tarpaulin in order to prevent erosion. All exposed soils must be protected for the duration of the construction phase with a suitable geotextile (e.g. Geojute or hessian sheeting) in order to prevent erosion and sedimentation of the watercourses in close proximity to these stockpiles.	Excavated material was placed on one side of the trenches which will be backfilled once stormwater measures are completed, and electrical wiring has been laid. Material stockpiles used for cement batching are located next to the site camp. Both these locations and methods are appropriate.
3.3	The stockpiles may only be placed within the demarcated areas, outside of delineated watercourses, the location of which must be approved by the RE, EO or ECO.	No stockpiles are in the vicinity of the watercourse. The stockpile and laydown areas are all deemed appropriate at the time of audit.
3.4	Stockpiles may not exceed 2 metres in height and their footprint should be kept to a minimum.	Excavated material and batching material stockpiles do not exceed the 2m height restriction.
3.5	Stockpiling of removed materials may only be temporary and should be disposed of at a registered waste disposal facility.	Noted, no material has been cleared that requires removal. Large bags are available at the material laydown area for enclosing plastic packaging material and will feed into the farms waste disposal system.

3.6	Soils from different horizons must be stockpiled such that topsoil stockpiles do not get contaminated by sub-soil material.	No stockpiles were observed during the site audit and no topsoil was stripped for construction purposes.
3.7	Stockpiles are to be stabilised if signs of erosion are visible.	No stockpiles were observed during the site audit and no topsoil was stripped for construction purposes.
3.8	Topsoil stockpiles must be monitored for invasive exotic vegetation growth. Contractors must remediate where necessary.	No topsoil was stripped for construction purposes.
3.9	No plant, workforce or any construction related activities may be allowed onto the topsoil stockpiles.	No topsoil was stripped for construction purposes.
3.10	No stockpiles or construction of any hard infrastructure may occur near watercourses.	Noted and complied with the riparian habitat has been demarcated and the site camp is located far away from this area.
4.	Topsoil Management	
4.1	All topsoil must be removed prior to the commencement of any development activities. Topsoil must be stockpiled. Stockpiled topsoil must be regarded as no-go areas.	No topsoil was stripped for construction purposes, the area contained heavily disturbed conditions.
4.2	Stockpiled topsoil must be monitored for invasive exotic vegetation growth. Contractors must remediate as and when required in consultation with the EO, RE and ECO.	No topsoil was stripped for construction purposes, the area contained heavily disturbed conditions.
4.3	No plant, workforce or any construction related activities may be allowed onto the windrowed topsoil.	No topsoil was stripped for construction purposes, the area contained heavily disturbed conditions.
4.4	All topsoil must be replaced during the rehabilitation phase to ensure the re-establishment of natural vegetation.	No topsoil was stripped for construction purposes, the area contained heavily disturbed conditions.
4.5	Handling of the topsoil should be minimised and should therefore only be handled before construction (to be windrowed) and after construction (topsoil to be replaced).	No topsoil was stripped for construction purposes, the area contained heavily disturbed conditions.
5.	Oil and Chemicals	
5.1	These substances must be confined to specific and secured areas within the contractor's camp, and in a way that does not pose a	A method statement was provided for Hazardous Chemical Handling and Spill Response. No fuel bowzers or storage tanks

	danger of pollution even during times of high rainfall.	were observed during the audit. A small 5-liter plastic jerry can is in place at the batching area to supply the cement mixer and the small generator with fuel.
5.2	Drip trays (minimum of 10cm deep) must be placed under all machinery and vehicles. The surface area of the drip trays will be dependent on the vehicle and must be large enough to catch any hydrocarbons that may leak from the vehicle while standing. The depth of the drip tray must be determined considering the total amount / volume of oil in the vehicle. The drip tray must be able to contain the volume of oil in the vehicle.	A generator was observed on site without the required drip tray placed underneath it. No other machinery and vehicles were observed during the site audit, apart from the water truck which is driven from the barn.
5.3	Any spills larger than 100l should be reported to all local authorities. Spill kits must be available on site and in all vehicles that transport hydrocarbons for dispensing to other vehicles on the construction site. Spill kits must be made up of material/product that is in line with environmental best practice (sunsorb is a recommended product that is environmentally friendly).	No oils or chemicals of significant volume are kept on site.
5.4	All spilled hazardous substances must be contained in impermeable containers for removal to a General & Hazardous Waste Landfill site, (this includes contaminated soils, and drenched spill kit material).	No oils or chemicals of significant volume are kept on site.
5.5	Vehicles to be serviced at the contractor laydown area and all refuelling to take place outside of the watercourses and the applicable variable buffer.	No vehicles are serviced at the site as they are stored in the garages on the farm and serviced off site. Only the cement mixer and the generator is refueled on site and per the method statements a drip tray is available for this purpose.
6.	Method Statements The ECO will evaluate the method statement and ensure that it covers the handling of the following aspects: Emergency spills procedures for the contamination of soils	The required method statements were available on file on site. The contracts manager has provided all the required method statements as per the ECO request. These include:

	from spills and fire. • Handling & storage of oils and chemicals. • Cement and concrete batching, which includes the storage, washing & disposal of cement, packaging, tools and plant. • Diesel tanks and refuelling procedures. • Crew camps and construction lay down areas. • Workshop maintenance and cleaning of plant.	• Dust mitigation • Concrete mixing • Fire management • Hazardous chemical handling and spills response • Soil erosion prevention and sediment control • Solid waste management • Traffic management
7.	Cement	
7.1	It is suggested that ready-mix cement be used as far as possible to minimize the possible impact on the surrounding environment.	A method statement for cement mixing was provided. During the site audit concrete batching was underway to the east of the development and adjacent to the site camp. An impermeable surface was created underneath the cement mixer through a small excavation and lining it with plastic builders sheeting and covering it with sand. Builders sheeting is also in place for the placement of the mixed concrete. Physical aggregate remains are removed and temporarily placed in blue bins provided, prior to removal.
7.2	Proper handling and disposal should minimise or eliminate discharges into watercourses.	The batching area is located towards the east of the development footprint away from any watercourse. A small excavation lined with impermeable sheeting and sand is in place under the mixing area to capture spills and prevent ground contamination.
7.3	Fresh concrete and cement mortar should not be mixed near waterbodies. Mixing of cement may be done within the construction camp, may not be mixed on bare soil, and must be within a lined, bound or bunded portable mixer. Consideration must be taken to use ready-mix concrete.	The batching area is located towards the east of the development footprint away from any watercourse. A small excavation lined with impermeable sheeting and sand is in place under the mixing area to capture spills and prevent ground contamination.
7.4	No mixed concrete shall be deposited directly onto the ground. A batter board or other suitable platform/mixing tray is to be provided	Builders sheeting is also in place for the placement of the mixed concrete. From here the cement is carted to the areas where

	onto which any mixed concrete can be deposited whilst it awaits placing.	footings are affixed in place.
7.5	Cement bags must be disposed of in the demarcated hazardous waste receptacles and the used bags must be suitably disposed of.	No empty cement bags were observed during the site audit. Per the method statement, <i>“Ensure proper handling, storage, and disposal of cement bags, leftover concrete, and wash water to prevent contamination of soil and water.”</i> A 50l steel bin is in place for temporary storage of cement bags prior to removal.
7.6	Spilled or excess concrete must be disposed of at a suitable landfill site.	No physical cement remains were observed during the site audit. Blue bins are available for the temporary storage of concrete remains.
7.7	Cement batching areas must be located in consultation with the RE, EO or ECO to ensure residues are contained and that the proposed location does not fall within sensitive areas such as drainage lines, storm water channels, etc.	The batching area is located towards the east of the development footprint away from any watercourse in line with the proposal from the ECO.
7.8	The mixing of concrete shall only be done at selected sites on mortarboards or similar structures to contain run-off into natural vegetation, soils and streams. Fresh concrete and cement mortar should not be mixed near the watercourses. No mixed concrete may be deposited outside of the designated construction footprint.	Only one batching area has been utilized. A small excavation lined with impermeable sheeting and sand is in place under the mixing area to capture spills and prevent ground contamination.
7.9	Cleaning of cement mixing and handling equipment shall be done using proper cleaning trays.	Per the method statement, <i>“Ensure that all equipment is washed only in designated areas to avoid wastewater contaminating surrounding soil and water bodies.”</i> No washing or contaminated runoff from the batching area was noted at the time of audit.
7.10	All empty containers must be stored in a dedicated area and later removed from the site for appropriate disposal at a Licensed Landfill site.	No batching related litter nor empty cement bags was noted during the audit. 50l Bins have been placed at the batching area as well as within the development footprint for waste disposal. The ECO has requested proof of disposal slips.
7.11	All empty cement bags are to be picked up immediately to ensure	No batching related litter nor empty cement bags was noted

	that cement dust is not blown away. Empty cement bags are to be stored in a weather and scavenger proof bin, in order to prevent leaching and groundwater contamination.	during the audit. 50l Bins have been placed at the batching area as well as within the development footprint for waste disposal.
7.12	Cement dust is poisonous and will be detrimental to the environment. Any spillage that may occur must be investigated and immediate remedial action shall be taken. The visible remains of concrete, either solid, or from washings, shall be physically removed immediately and disposed of as waste to a Licensed Landfill site.	No cement spills nor physical remains were observed during the site audit. Per the method statement, <i>“Ensure proper handling, storage, and disposal of cement bags, leftover concrete, and wash water to prevent contamination of soil and water. In case of spills, use spill kits (with sand or absorbent materials) to contain and clean up any cement, water, or other hazardous substances.”</i>
7.13	Washing of the remains into the ground is unacceptable.	No cement spillage or remains were observed during the site audit and an impermeable surface is in place at the batching area.
7.14	Should any cement silos be employed on site; they are to be fitted with appropriate air pollution control equipment to control dust during fill-up operations.	No cement silos have been employed on site.
7.15	A batter/dagga board mixing trays and impermeable sumps should be provided, onto which any mixed concrete can be deposited whilst it awaits placing.	An impermeable surface was created underneath the cement mixer through a small excavation and lining it with plastic builders sheeting and covering it with sand. Builders sheeting is also in place for the placement of the mixed concrete.
8.	Dangerous and Toxic Materials	
8.1	Materials such as fuel, oil, paint, herbicide and insecticides must be sealed and stored in bermed areas or under lock and key, as appropriate, in well-ventilated areas.	A method statement was provided please refer to Appendix G. No hazardous chemicals will be stored on site during construction, apart from very limited fuel and oil, per the MS. A small 5-liter plastic jerry can is in place at the batching area to supply the cement mixer and the small generator with fuel.
8.2	Storage facilities should be bunded, roofed, secure, rain, wind and tamper-proof.	No hazardous chemicals will be stored on site during construction, apart from very limited fuel and oil, per the MS. A small 5-liter plastic jerry can is in place at the batching area to supply the cement mixer and the small generator with fuel.

8.3	Storage areas shall display the required safety signs depicting “no smoking”, “No Naked lights” and “Danger” containers shall be clearly marked to indicate contents as well as safety requirements.	No hazardous chemicals will be stored on site during construction, apart from very limited fuel and oil, per the MS. A small 5-liter plastic jerry can is in place at the batching area to supply the cement mixer and the small generator with fuel.
8.4	Sufficient care must be taken when handling these materials to prevent pollution. Training on the handling of dangerous and toxic materials must be conducted for all staff prior to the commencement of construction. In the case of pollution of any surface or groundwater, the Regional Representative of the Department of Water and Sanitation (DWS) must be informed immediately.	A method statement was provided please refer to Appendix G. Per the MS “Refuelling of plant and machinery on site shall only take place at designated locations, and drip trays will be used for all refuelling and similar activities.
9.	Bulk Storage of Fuels and Oils	
9.1	Bulk fuel storage tanks on the site shall be on an impervious surface that is bunded and able to contain at least 110% of the volume of the tanks.	No bulk fuel storage will be done on site.
9.2	Bulk fuel storage tanks shall be located in a portion of the construction camp where they do not pose a high risk in terms of water pollution.	No bulk fuel storage will be done on site.
9.3	Bulk fuel storage tanks shall be placed so that they are out of the way of traffic, so that the risk of the tanks being ruptured or damaged by vehicles is minimised.	No bulk fuel storage will be done on site.
9.4	Bulk fuel storage should be covered during the rainy season.	No bulk fuel storage will be done on site.
10.	Use of Dangerous and Toxic Materials	
10.1	The contractor shall keep the necessary materials and equipment on-site to deal with spills/fires of the materials present should they occur.	A method statement has been included as Appendix G. No hazardous material, apart from PPC cement bags, and very limited fuel and oil is available on site. The contractor noted that waste manifests/disposal slips and permits for hazardous waste will be available within the SHEQ office and will be made available

		upon request by an inspector.
10.2	The contractor shall set up a procedure for dealing with spills/fires, which will include notifying the ECO and the relevant authorities prior to commencing with construction. These procedures must be developed in consultation and approval by the appointed EO. All staff should receive some form of fire training.	An incident reporting system has been included in the MS within the environmental file on-site. According to the contractor, certain staff members have received fire safety training.
10.3	Fire buckets and hoses shall be in good working order and easily accessible on site.	Fire buckets and hoses are not available. A large watering truck is available on site for fire management during construction. Fire fighting equipment to deal with electrical fires will be available once operational.
11.	Contractors Camp Site and Crew Camps	
11.1	The Contractor shall, in conjunction with the EO, designate the restricted eating area for eating during normal working hours. Two refuse bins with lids must be provided and cleaned on a daily basis. The bins are to be secure, wind, weather and scavenger proof. Designated areas for smoking must be provided.	A tented site camp has been established at the entrance to the site and is in a good and clean condition. The workforce utilizes the tented camp as eating and laydown area.
11.2	No fires are to be lit outside of a facility designed to contain fires. The adequacy and positioning of these structures must be determined in consultation with the EO and ECO.	No evidence of fires was observed during the site audit and no mention of fires are contained in the ECO reports.
11.3	No animals, domestic or otherwise are allowed on the premises. The feeding, or leaving of food, for stray or other animals in the area is strictly prohibited.	No evidence of domestic animals were observed during the site audit.
11.4	Litter (even if originating outside the camp) and concrete bags etc. must be picked up and put into suitably closed bins. The contractor shall provide labourers to clean up the contractor's camp and construction site on a daily basis. These areas shall then be inspected by the contractor or his/her ESO to ensure compliance with this requirement. Rubble and litter must be removed every two	Based on the ECO reports and the site audit, several 50l plastic blue drums are available and in place on site. Large bags are available at the material laydown area for enclosing plastic packaging material and will feed into the farms waste disposal system. No litter was found/observed on-site during the audit.

	weeks or more often as the need arises and be disposed of at a registered landfill site as designated by the Local Municipality's solid waste removal department.	
11.5	Accommodation for members of the workforce will not be permitted on site unless authorisation has been given in terms of the Environmental Authorisation issued for the site.	All members of the workforce are permanently housed on the farm.
11.6	The contractor's camp shall be monitored for dust fallout and dust suppression applied as required. This may include the laying of gravel, the use of grey water can be considered as an option if the required permits have been acquired.	Dust suppression is being implemented and a watering truck is available on-site using water from the farm dam. The gravel access roads along the northern boundary and the main internal road were watered at the time of the audit.
11.7	The contractor's camp, offices and storage facilities shall be located within the site boundaries. If this is not feasible an alternative should be designated in consultation with the ECO.	The contractors camp is located just east of the entrance to the site in a previously disturbed area. A large canvas tent has been erected to serve as a site camp and eating area along the eastern boundary. No offices are required and material storage is done within the development footprint.
11.8	The contractor shall provide labourers to clean up the contractor's camp and construction site on a daily basis. These areas shall then be inspected by the contractor or his/her ESO to ensure compliance with this requirement.	The site is in a good and clean condition throughout.
11.9	The contractor shall be responsible for cleaning the contractor's camp and construction site of all structures, equipment, residual litter and building materials at the end of the construction period and, the topsoil restored in areas where landscaping is to take place.	The site is in a good and clean condition throughout.
12.	Ablution Facilities	
12.1	The contractor will be responsible for providing all sanitary arrangements for his and the sub-contractors team. It is proposed that that one toilet for 15 people will be established on site.	One chemical toilet has been provided by the contractor on a trailer which moves with the construction team.

12.2	Sanitary arrangements shall be to the satisfaction of the ECO and the local authority. The contractor shall keep the toilets in a clean, neat and hygienic condition. The contractor shall supply toilet paper at all toilets at all times . Toilet paper dispensers shall be provided in all toilets.	The chemical toilet is in a good and clean condition.
12.3	Toilets provided by the contractor must be easily accessible and a maximum of 150m from the works area to ensure they are utilised. All toilets will be located within the contractor's camp. Should toilets be needed elsewhere, their location must first be approved by the ER, ECO.	A chemical toilet was noted adjacent the current works area, inside the footprint, outside of any buffer area of the delineated riparian habitat.
12.4	The contractor (who must use reputable toilet-servicing company) shall be responsible for the cleaning, maintenance and servicing of the toilets. The contractor (using reputable toilet-servicing company) shall ensure that all toilets are cleaned and emptied before the builders' or other public holidays.	The chemical toilet on site is in hygienic condition.
12.5	Toilets out on site must be secured to the ground and have a sufficient locking mechanism operational at all times.	One chemical toilet has been provided by the contractor on a trailer which moves with the construction team. The toilet is affixed to the trailer.
12.6	The natural surrounding area may NOT be used for any ablution activities.	No such incidents have been recorded.
13.	Dust	
13.1	Potable water may not be used as a means of dust suppression, alternative measures must be sourced. The use of 'grey' water must be investigated as an alternative. The contractor will be responsible to source this water and obtain the required approvals. Dust mitigation measures to include the use of chemical dust suppressants, such as Lignosulphonates; and the use of soil stabilisers such as straw for large open ground areas.	A method statement for dust suppression was obtained. Dust suppression is being implemented and a watering truck is available on-site using water from the farm's irrigation dam. The gravel access roads along the northern boundary and the main internal road were watered at the time of the audit.

13.2	The construction camp shall be treated with dust suppression during dry and windy conditions to control dust fallout. Dust production must be controlled by regular dust suppression of roads and works area, should the need arise. (NB: Concrete dust is toxic and damages soil properties. Therefore dust suppression to prevent dust spread must not be done where concrete dust has fallen or it will infiltrate into the soil. Concrete bags must not be allowed to blow around the site and spread cement dust.)	Dust suppression is done regularly throughout the site as and when required. A rotating sprayer was also noted within the works area connected to the water pipelines provided and utilized on site for dust suppression. No dust suppression is required at the contractors camp, as it constitutes a tent with no exposed areas.
13.3	At the end of construction, the site camp must be fully rehabilitated by removing the temporary surface and ripping the area to loosen the soil.	To be audited once construction activities are completed.
13.4	All vehicles transporting material that can be blown off (e.g. soil, rubble etc.) must be covered with a tarpaulin, and speed limits of 20 km/h must be adhered to.	Not applicable at this stage as no such material is transported at this stage.
14.	Noise	
14.1	Work hours during the construction phase shall be strictly enforced unless permission is given (07H00 – 18H00). Permission shall not be granted without consultation with the local industries and businesses by the EO. No work to be done on Sundays. The EO must inform the residents of houses and businesses adjacent to the development in writing 24 hours prior to any planned activities that will be unusually noisy or any other activities that could reasonably have an impact on the adjacent sites. These activities could include, but are not limited to use of pneumatic jack-hammers and compressors etc. No noise louder than 70dB from the ambient noise level.	All construction activities are restricted to the normal working hours on the farm and no work is done on weekends.
14.2	Noise reduction is essential and Contractors shall endeavour to limit unnecessary noise, especially loud talking, shouting or	No heavy machinery nor noise generating activities are required on site, apart from the batching of concrete and the running of

	whistling, radios, sirens or hooters, motor revving, etc. The use of silent compressors is a specific requirement. All machinery to be muffled where possible.	generator which is not significant.
15.	Visual Management	
15.1	Designate the former dam and riparian corridor as 'no-go areas' for site camp establishment, materials storage, stockpiling, dumping, to avoid and prevent damage or intrusion to these areas.	The western boundary has been demarcated with formal electrical fencing of the footprint, as well as 1.8m painted stakes were put in place along the no-go areas. No activities are allowed although a shallow water pipeline was laid here and should be rehabilitated.
15.2	Limit construction activity to within the hoarding areas, constructing on disturbed areas only to minimize impact to visual amenity resources identified (e.g., tree clusters, windbreaks, etc.).	No vegetation clearing was necessary for construction to commence, and all activities are conducted in disturbed areas.
15.3	Ensure post-construction repair and rehabilitation of the site, towards improvement of disturbed, areas and areas degraded by the construction activity.	During the site audit, <i>Syzygium</i> hedging has been planted to provide a vegetation screening hedge. All other rehabilitation efforts will commence after construction is completed.
15.4	Implement a construction phase environmental management plan (CEMP) to ensure on-going management of environmental matters, including noise, dust, and erosion control.	The approved CEMP is being implemented on site.
15.5	Keep sufficient distance from the existing Broodkraal farm workers village so to allow for a landscape buffer/interface along the edge. Consider productive use of space between panels.	Sufficient distance from the existing Broodkraal farm workers village for the buffer has been implemented and the required landscape interface has been established.
15.6	New screen planting, using clusters of indigenous trees (or 'naturalized' introduced/exotic species now considered part of the cultural landscape) should be integrated into the layout to further obscure and filter views of the proposed solar panels from the viewpoints and views from the farm works village immediately adjacent, taking cues from established landscape patterns within the contextual landscape.	A visual screening, per the recommendations of the VIA has been planted along the northern boundary of the site. The applicant has planted <i>Syzygium</i> which is an indigenous shrub and commonly used for hedging and screening which would provide sufficient visual screening. The trees are still small in size.
15.7	With respect to the utility components and service infrastructure	The utility components including electrical boxes come standard

	(ancillary building, etc), muted colours and 'earth tones' are more subtle and are more easily absorbed (visually) than bright or highly reflective surfaces. Suitable colours include grey, olive green, ochre, brown, etc. – refer to on-site geology, soil, and vegetation types for reference. Rough/textured surfaces are preferable to shiny/highly reflective surfaces in terms of visual absorption (minimise reflection/glare).	as olive green and the cement base within the development footprint will remain in its natural grey color. No highly reflective surfaces apart from the panels itself are included.
15.8	The detailing of internal access roadways and service yards associated with the development should reflect a green infrastructure approach, which alludes to the rural character of the context of the site as a cultural landscape, incorporating where possible earth-swales for storm-water run-off rather than heavily engineered concrete channels and drains. Where practical, existing roadways should be utilized.	Existing roadways have been utilized around the solar plant. The roadways are small gravel roads, no construction of roads are being done on-site.
15.9	Roadways should not be over-scaled and should include new tree planting where possible; concrete kerbs and channels should be avoided. With respect to the new accessways and roadways, these should respond to historical patterns and existing alignments in scale and placement, avoiding excessive earthworks / cut and fill or vegetation removal.	Existing roadways have been utilized around the solar plant. The roadways are small gravel roads, no construction of roads are being done on-site.
15.10	Storm-water management through 'soft' engineering of the site, incorporating the principles of sustainable drainage and water sensitive design, will be environmentally advantageous and further mitigate the visual impact of driveways, service yards and other hardened surfaces (this to be ensured through meaningful engagement between freshwater ecology and storm-water engineering).	Stormwater trenches have been excavated within the development footprint as well as along the eastern and northern boundaries of the development (due to the site slope) for the effective management and treatment of groundwater. These channels redirect only excess groundwater away from the site footprint and away from the houses located immediately north of the site, towards the unnamed tributary located west of the site. A drainage pipe is covered with rocks and black plastic sheeting for

		this purpose in line with best practice. The development footprint will remain as a permeable area where stormwater will seep into the ground. Internal and access roads will remain gravel paths and driveways.
15.11	With respect to site boundaries, apart from gateway thresholds, solid masonry boundary walls should be minimized; and no galvanized steel palisade fencing should be allowed. Visually transparent fencing (e.g., welded mesh Clearvu or similar), is preferable, especially if integrated into generous planting beds to properly 'disappear' into the landscape, noting that dark grey or black fencing is more visually recessive than green	No solid walls have been constructed or are proposed. The development footprint has been formally demarcated through the installation of permanent electrical wire fencing which is visually transparent.
15.12	Landscaping must enhance the aesthetic appeal of the development. The buildings that are to be erected must be aesthetically pleasing and blend into the area as far as possible.	The utility components including electrical boxes come standard as olive green and the cement base within the development footprint will remain in its natural grey color. No highly reflective surfaces apart from the panels itself are included.
16.	Fires	
16.1	Fire training and equipment to be nearby to put fires out. The Contractor shall ensure that there is appropriate fire-fighting equipment available on site at all times.	The ECO has requested that the appropriate firefighting equipment be placed on-site. Per the method statement and the ECO reports no firefighting equipment apart from the watering truck is available on site.
16.2	Fires must be within designated areas and must be in small scale. Absolutely no burning of waste is permitted.	No evidence of fires was observed during the site audit.
16.3	Fires will only be allowed in facilities especially constructed for this purpose within fenced Contractor's camps. Wood and/or charcoal are the only fuels permitted to be used for fires. The contractor must provide sufficient wood (fuel) for this purpose. Fires in the designated areas must be small in scale so as to	No evidence of fires was observed during the site audit.

	prevent excessive smoke being released into the atmosphere. Heavy smoke may not be released into the air.	
16.4	No felling of trees or wood collection is allowed from private or public property.	No trees required clearance within the footprint and no evidence of fires was observed during the site audit.
17.	Erosion and Sedimentation	
17.1	To reduce the loss of material by erosion, the contractor shall ensure that disturbance on site is kept to a minimum. The disturbance especially includes the movement of heavy vehicles. These areas must be cordoned off so that vehicles or construction personnel cannot gain access to these areas.	A method statement has been obtained for erosion and sedimentation management. No erosion or sedimentation was observed during the site audit. Through the retention of the existing groundcover in place which is permeable and the use of gravel paths and driveways, as well as the installation of groundwater channels, no soil erosion should occur.
17.2	The contractor shall be responsible for rehabilitating all eroded areas in such a way that the erosion potential is minimised after construction has been completed. These areas are to be filled with mulch or funnels constructed to route the water. All disturbed areas that will not be rehabilitated within the construction phase, must be mulched to encourage vegetation re-growth. Mulch used must be free from alien seed.	No erosion or sedimentation was observed during the site audit. Through the retention of the existing groundcover in place within the development footprint which is permeable, and the use of gravel paths and driveways, as well as the installation of groundwater channels, no soil erosion should occur.
17.3	In the case of strong wind and/or rain all stockpile material must be covered with a tarpaulin in order to prevent erosion.	No stockpiles are on site other than the excavated material on one side of the trenches and concrete batching sand.
18.	Fauna	
18.1	All possible sensitive faunal species present on the site must be rescued and relocated to another suitable location prior to the commencement of construction activities.	No reports of animal rescues were recorded nor required.
18.2	All construction workers must be informed that the intentional killing of any animal is not permitted as faunal species are a benefit to society.	All construction workers are aware of this and no killing, hunting or trapping of animals have occurred.
18.3	All on site staff should be informed about sensitive aquatic species,	The ECO has requested that a faunal awareness talk be held on-

	sensitive estuarine habitats, and the responsible disposal of construction waste.	site.
18.4	Any lighting to be implemented within the study area should be designed in such a way so as to avoid light emission into the freshwater habitat as well as the non-indigenous woodland habitat. Lighting may affect movement of more cryptic and nocturnal mammal species that may avoid lit areas.	Note yet applicable, no lighting have been installed.
18.5	Disturbance of the area upstream and downstream of construction site must be avoided.	Along the western boundary of the site, it was noted that a 25mm water pipeline was laid in a shallow trench within the no-go area. The pipeline does not continue to the watercourse and connects to an existing water pipeline toward the east of the unnamed tributary. This pipeline connection provides the required water for the future washing of the pv panels. This pipeline has, however, encroached within the demarcated no-go area. The ECO should provide the contractor with a methodology and ensure that this linear disturbance is appropriately rehabilitated.
19.	Heritage	
19.1	In terms of the National Heritage Act, 1999 (Act No. 25 of 1999), should any archaeological artefacts be exposed during construction activities, work on the area where the artefacts were found shall cease immediately and the ECO as well as the Local Council shall be notified within 24 hours. Finds of human remains must be treated as a crime scene. Upon receipt of such notification, the ECO will arrange for the excavation to be examined by an Archaeologist. Under no circumstances shall archaeological artefacts be removed, destroyed or interfered with. Any archaeological sites exposed during demolition or construction activities must not be disturbed prior to authorisation by the	No archaeological artefacts have been exposed during the construction activities thus far.

	Heritage Western Cape and/or the South African Heritage Resources Agency or the appropriate provincial heritage resource agency.	
19.2	No building older than 60 years may be demolished or altered without prior approval by Heritage Western Cape.	No buildings have been altered or demolished.
19.3	No graveyard or grave may be altered or impacted upon during the construction or operational phase of the development.	No graveyards have been altered or impacted.
20.	Hydrology	
20.1	Increased run-off during construction must be managed using berm and other suitable structures as required to ensure flow velocities are reduced; this must be done in consultation with the Resident engineer as well as the ECO. The Contractor shall take reasonable measures to control the erosive effects of storm water runoff.	No increased runoff or signs of erosion on or adjacent to the site were observed during the site audit. Through the retention of the existing groundcover in place within the development footprint which is permeable, and the use of gravel paths and driveways, as well as the installation of groundwater channels, no increased runoff from the site should occur.
20.2	Storm water, wherever possible, should be allowed to soak into the land in the area on which the water fell.	Through the retention of the existing groundcover in place within the development footprint which is permeable, and the use of gravel paths and driveways, the stormwater will be allowed to soak into the land on which the water fell.
20.3	Clear areas for the proposed construction in a phased manner and retain as much indigenous vegetation as possible.	The existing groundcover is in place within the development footprint which is permeable, and the paths and driveways are gravel. The implementation of the pv plant will not be phased prior to connection of the panels to the grid.
20.4	In the event of pollution caused as a result of construction activities, the contractor, according to section 20 of the National Water Act, 1998 (Act No. 36 of 1998) shall be responsible for all costs incurred by organisations called to assist in pollution control and/or to clean up polluted areas and water courses.	A method statement has been obtained for spills and response procedure. Please refer to Appendix G. No spills or pollution on site were identified nor reported.
20.5	The contractor shall ensure that excessive quantities of sand, silt	The no-go area demarcated adjacent to the western boundary

	and silt-laden water do not enter the non-perennial watercourse found on site. No wastewater may run freely into the surrounding area.	and the large buffer area it represents between the non-perennial watercourse and the site boundary will ensure that no excessive quantities of sand and silt-laden water enter the area. No wastewater runs freely on the site.
20.6	Sediment control devices (such as geotextile sediment traps) should be installed downgradient of the construction works, to avoid excess sediment entering the receiving freshwater features.	According to the ECO sediment control devices are not applicable as vegetation is seen next to the site on the downgradient, and construction is happening in the summer, so sediment should not be an issue.
20.7	Proliferation of alien vegetation as a result of the construction and operation related disturbances must be monitored and controlled.	No alien vegetation was observed in and around the construction footprint at the time of audit. As part of the MS provided for erosion control it is stated that weed control and alien vegetation maintenance will be continuously carried out as part of the rehabilitation of the site.
20.8	It is highly recommended that the ground cover under the solar panels be vegetated with indigenous terrestrial graminoid species, maintained and not be left as gravel or bare ground to assist with stormwater management and prevent erosion at the base of the panels (Cook and McCuen, 2013). Alternatively, a buffer strip must be placed after the most downgradient row of panels. The buffer strip length must be sufficient to return the runoff characteristics with the panels to those of runoff experienced before the gravel and panels were installed (Cook and McCuen, 2013).	The ECO has requested confirmation from the contractor on <i>“what will be done underneath the solar panels”</i> <u>To be audited once the construction activities are completed.</u>
21.	Soil	
21.1	Topsoil must be stripped from all areas that are to be utilized during the construction period and where permanent structures and access is required. These areas will include comprising the permanent works, pipeline trenches, stockpiles, access roads, construction camps and lay down areas.	No topsoil was stripped for construction purposes, the area contained heavily disturbed conditions, and the groundcover is still intact.

21.2	Topsoil must be deemed to be the top layer of soil containing organic material, nutrients and plant grass seed. For this reason, it is an extremely valuable resource for the rehabilitation and vegetation of disturbed areas. At the beginning of the construction phase, topsoil removed for vegetation clearance must be stripped to a minimum depth of 300 mm and windrowed.	No topsoil was stripped for construction purposes, the area contained heavily disturbed conditions, and the groundcover is still intact.
21.3	All topsoil must be removed and stockpiled on the site. However, the use of topsoil for rehabilitation contaminated by the seed of alien vegetation must not be permitted unless a programme to germinate the seed and eradicate the seedlings is drawn up and approved, or some other mitigatory feature is found. This must be approved by the ECO.	No topsoil was stripped for construction purposes, the area contained heavily disturbed conditions, and the groundcover is still intact.
21.4	Backfill will require contouring to ensure that it blends in with the surrounding environment.	Several trenches have been adequately backfilled and shaped according to the natural contour and surrounding area.

CONCLUSION

Based on the information obtained and the site visit conducted on the 7th of November 2024, the applicant has sufficiently complied with the conditions of the Environmental Authorisation and EMPr. Furthermore, the EMP is considered adequate and effective to manage and mitigate the activities.

No specific contradictions between the EA and EMP were noted.

The only non-compliance with the conditions in the Environmental Authorization relates to the 25mm water pipeline which was found to be laid in a shallow trench within the no-go area. The pipeline does not continue to the watercourse and connects to an existing water pipeline toward the east of the unnamed tributary. The pipeline has, however, encroached within the demarcated no-go area. It is recommended that this pipeline be appropriately trenched to allow for the rehabilitation of this disturbed area. The ECO should provide the contractor with a methodology and ensure that this linear disturbance is appropriately rehabilitated.

The outcome of this audit has not found insufficient mitigation of environmental impacts associated with the undertaking of the listed activities in line with the EMPr. As such a public participation process in terms of Regulation 34(5) will not be undertaken.

In compliance with regulation 34(6) the holder of the EA must within 7 days of the date of submission of an environmental audit report to the competent authority, notify all potential and registered interested and affected parties of the submission of that report, and make such report immediately available –

(a) to anyone on request; and

(b) on a publicly accessible website, where the holder has such a website.

Compiled by:

A handwritten signature in black ink, appearing to be 'Renier Kapp', written over a light blue grid background.

Renier Kapp
for KAPPEC

ANNEXURE A – SITE PHOTOGRAPHS



Excavated trenches for implementing groundwater control measures.



Excavated trenches for implementing groundwater control measures.



Cement batching active for the construction of the solar panel footings and control stations.



Impermeable builders plastic sheeting used during cement batching.



Impermeable builders plastic sheeting used during cement batching.



Water truck available for dust suppression.



Site camp location adjacent (east) of the development area.



Entrance to the solar units.



Eastern boundary of the development footprint with security fencing installed seen towards the north.



Eastern boundary of the development footprint with security fencing seen towards the south.



Condition of the newly installed solar panel footings and frame structures.



Condition of the site seen towards the north with a channel being lined with rocks for groundwater control.



Excavated trenches towards the middle of the site where rocks are utilized for assisting with groundwater control.



Excavated trenches towards the middle of the site where rocks are utilized for assisting with groundwater control.



Excavated trenches towards the middle of the site where rocks and pipelines are installed for groundwater control.



Excavated trenches towards the middle of the site where rocks and pipelines are installed for groundwater control.



Excavated trenches towards the middle of the site where rocks and pipelines are installed for groundwater control.



Groundwater cutt-off trenches along the northern boundary conveying groundwater towards the west.



Groundwater cut-off trenches along the northern boundary conveying groundwater towards the west.



Structural material stored on-site with a bag for plastic storage.



Structural material stored on-site with a generator. No drip tray in place.



Structural material stored on-site with a bag for plastic storage.



Condition of the newly installed solar panel footing and frame structures as seen towards the south.



Condition of the newly installed solar panel footing and frame structures as seen towards the west.



Condition of the newly installed solar panel footing and frame structures as seen towards the south.



Condition of the newly installed solar panel footing and frame structures as seen towards the east.



Excavated holes for the placement of the solar panel footing structures.



Footings in place awaiting concrete fillings.



Concrete cast footings in place. Dry concrete remains are removed once concrete has set.



The condition of the site with water pipelines to be installed and utilized for washing of the panels.



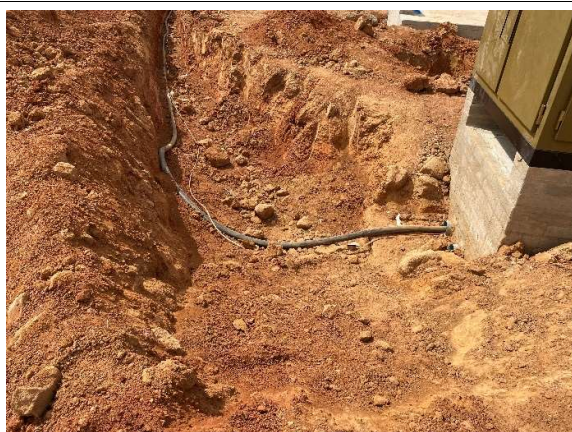
Completed panel footing and frame structures as seen towards the east.



A portable chemical toilet is in place on-site.



Completed electrical control stations.



Installed electrical wiring leading from the solar panel units toward the electrical control station.



Completed electrical control stations.



Electrical control station substructure.



Excavated trench for the installation of electrical distribution cables.



Control station substructure being constructed.



Completed and covered trenches of power cables leading towards the ring main unit and distribution network.



The ring main unit located immediately northwest of the site.



Watering of gravel access roads on site towards the northwestern corner.



Watering of gravel access roads on site towards the northern boundary.



A rotating sprayer on site for dust suppression.



Excavated trenches where water pipelines have been installed for the washing of the panels.



Excavated trenches where water pipelines have been installed for the washing of the panels.



Excavated trenches where water pipelines have been installed for the washing of the panels.



Visual screen planted with *Syzygium* hedging along the northern boundary of the site.



Visual screen planted with *Syzygium* hedging along the northern boundary of the site.



Visual screen planted with *Syzygium* hedging along the northern boundary of the site.



Visual screen planted with *Syzygium* hedging along the northern boundary of the site.



Towards the west of the development seen towards the south showing the condition of the no-go area.



Towards the west of the development seen towards the south showing the condition of the no-go area.



Along the western boundary of the development seen towards the south showing the interface between the no-go boundary and the accompanying stakes erected.



Along the western boundary of the development footprint seen towards the south showing the no-go area stakes.



From the western boundary fence of the development seen towards the watercourse (west).



A water pipeline connecting to an existing pipeline within the no-go area, although outside the wetland boundary.



No-go stakes towards the back of picture as seen from the no-go area towards the development (east).



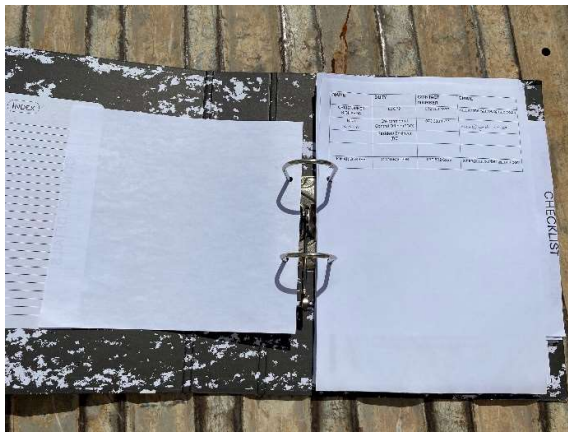
The southwestern boundary of the development footprint as seen towards the southeast.



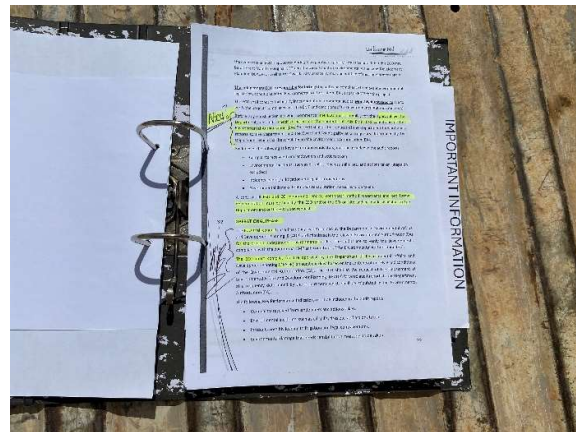
Along the southern boundary (within) of the development footprint as seen towards the east.



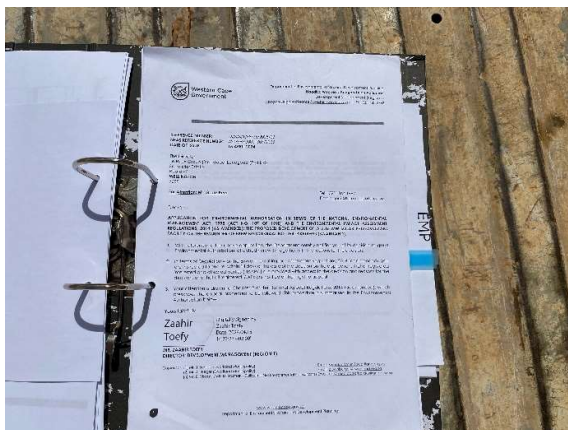
Along the southern boundary (outside) of the development footprint as seen towards the west.



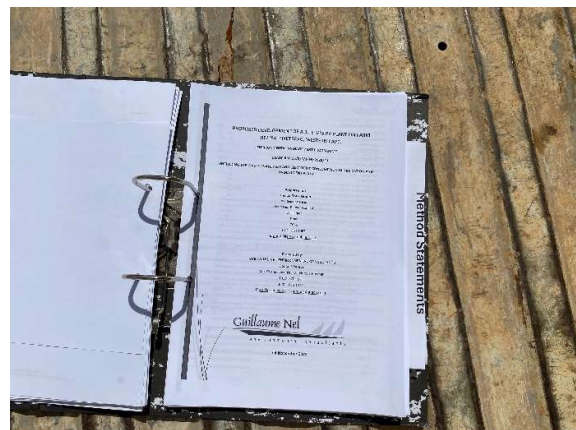
ECO audit checklist included in the environmental file on site.



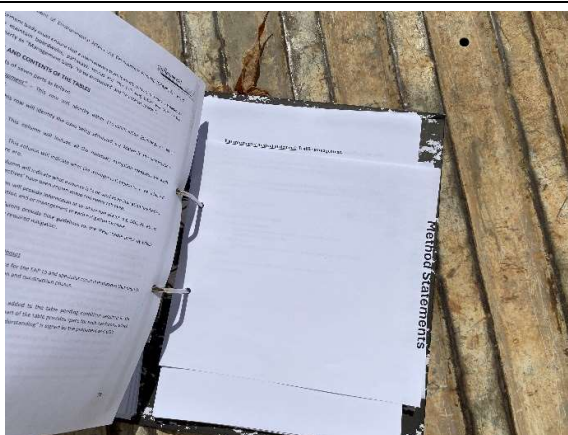
ECO audit checklist included in the environmental file on site.



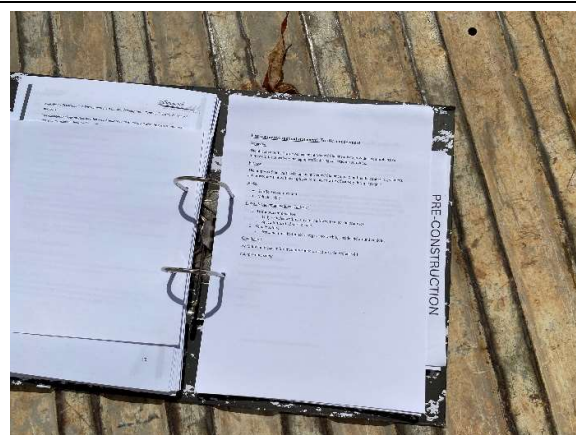
Environmental Authorization included in the environmental file on site.



Approved EMPr included in the environmental file on site.



Contractor method statements included in the environmental file on site.



Contractor method statements included in the environmental file on site.