

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

EA DEA&DP Ref: 16/3/3/1/F5/25/2028/23

INFORMAL ECO AUDIT REPORT

Prepared for:

The Director

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28 September 2024



ABBREVIATIONS

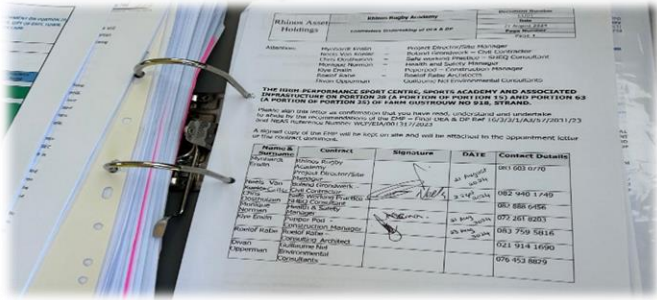
BGCMA	Breede-Gouritz Catchment Management Agency
DEA&DP	Department of Environmental Affairs and Development Planning
DWS.....	Department of Water Affairs and Sanitation
EA	Environmental Authorization
EAP	Environmental Assessment Practitioner
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMPr.....	Environmental Management Programme
ER	Employer's representative
DEO	Designated Environmental Officer
GNEC	Guillaume Nel Environmental Consulting
I&AP	Interested and Affected Parties

INTRODUCTION

This Informal ECO Report is distributed to the project team after the site audit was undertaken. The contractor has 3 working days after this report is distributed to provide a close out report with photographic evidence of how the findings in this report were rectified, if required.

The ECO Report is compiled in order to ensure continuous improvement with regards to environmental related matters. The aim is furthermore, to increase the contractor's compliance rating in terms of the environmental approvals, and to advise on environmental matters which might occur during construction activities. This ECO report incorporates the monthly environmental findings and furthermore may include corrective measures/actions which were taken by the contractor.

CLOSE OUT ON FINDINGS REQUIRED

	Finding	Close Out Recommendation
1	EA Condition 9 The EMPr must be included in all relevant contract documentation for the applicable phases of implementation. 	The EMPr has not been included in the contract documentation, because there is no documentation as the Holder of the EA is the contractor. A letter stating the EMPr will be implemented on site has been signed as is kept on file.
2	EA Condition 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.	The Environmental File has been set up and all the necessary files have been placed in the file.
3	EA Condition 13.1 The holder must undertake an environmental audit within three (3) months of the commencement of development activities and submit an Environmental Audit Report to the Competent Authority within one (1) month after the completion of the environmental audit.	An External Environmental Audit must be done within 3 months of commencement, and as the construction phase commenced before the ECO was notified, the External Audit should be done as soon as possible. Quotes have been sent to the Client.

		This condition however will stay partial compliant as the timeframe is 6 months after commencement.
4	Flora Three (3) Outeniqua yellowwood trees (<i>Afrocarpus falcatus</i>) are present on the southern boundary of Portion 63 of Farm No. 918. At this point in time, the two of the three Outeniqua Yellowwood trees will be retained and not impacted by the proposed development. Application under Section 15(1) of the National Forest Act, 1998, as amended, will be made to obtain a licence for the removal of one of the trees.	No trees were retained on site, the contractor to please supply proof that the trees are outside of the boundary wall with the following coordinates: A number of Outeniqua yellowwood trees (<i>Afrocarpus falcatus</i>) occur on the southern boundary of Portion 63 of Farm 918 (Figure 11). The waypoints for these species are: AF1 (S34.11872° E18.88320°), AF2 (S34.11886° E18.88344°) and AF3 (S34.11896° E18.88364°). The Client is advised to please send proof that the above coordinates are outside of the boundary wall.

PROJECT DESCRIPTION

The proposed development entails the development of a solar photovoltaic facility on the remainder of Farm Broodkraal No. 154, Piketberg (Swartland) that will generate approximately 3.15 MW of electricity for the servicing of the existing Broodkraal farm packhouses and coolers for the increase and optimisation of agricultural productivity.

The following infrastructure is proposed:

- Approximately 6912 modules;
- The portrait orientation arrangement of approximately 72 tables in three (3) rows; and
- An approximate clearance height of 600mm.

The development footprint will be approximately 3.6ha in extent.

The proposed development will connect to an existing 11kV powerline and substation for the conveyance of the generated electricity. Existing access to the site will be obtained via the R399 near Wittewater.

COMPLIANCE WITH THE EA

EA Condition No.	Short description of each Condition	Comments on Compliance (The following colours are used for ease of reference) Compliant Partial-compliant Non-compliant Require confirmation Not auditable
1	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.	Note
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 period of five (5) years, from the date of issue, during which period the holder must commence with the authorised listed activities; and A period of ten (10) years, from the date the holder commenced with the authorised listed activities, during which period the authorised	Compliant The holder commenced with construction at the beginning of August, and the EA was granted on the 15th of April, thus within 5 years time. The construction will continue until next year.

	listed activities for the construction phase, must be concluded.	
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.	Note
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.	Compliant No changes or deviations from the scope was observed in the audit.
5	A minimum of seven (7) calendar days' notice, in writing, must be given to the Competent Authority before commencement of the development activity. The notice must make clear reference to the site details and EIA Reference number given above. The notice must also include proof of compliance with the following conditions described herein: Conditions: 6, 7, 10 and 14.	Compliant A notification of commencement was sent to the relevant authority on the 24 th of July 2024, and made reference to the mentioned conditions.

6	The holder of the authorisation must in writing, within 14 (fourteen) calendar days of the date of this decision – 6.1.3 the date of the decision; and 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; 6.1.4 the date of issue of the decision; 6.2 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); 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 name of the responsible person for this Environmental Authorisation, 6.4.3 postal address of the holder, 6.4.4 telephonic and fax details of the holder, 6.4.5 e-mail address, if any;	Compliant The EA was issued on the 15th of April 2024, and the I&APs has been notified of the EA on the 17th of April, so within 2 days of the EA being issued.
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	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).	
7	The listed activities, including site preparation, must not commence within twenty (20) calendar days from the date the holder notifies the 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.	Compliant 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.
8	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.	Compliant The EMPr is implemented on site, and is kept on file.
9	The EMPr must be included in all relevant contract documentation for the applicable phases of implementation.	Partial Compliant The EMPr has not been included in contract documentation as there are no real contract documentation. The contractor and developer should please supply the ECO with a letter stating that the EMPr will be

		included and implemented in all future documentation on site.
10	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.	Compliant An ECO has been appointed on site, Nica Kotze from GNEC acts as the ECO on site.
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.	Compliant A copy of the EA, and EMPr has been placed on file in the site file. Thank you for that.
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 compliance with the conditions contained herein.	Compliant Access to the site referred to in Section C has been granted.
13	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	Note The ECO requested quotations for the External Audit to be done, the audit should please be done in October

	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). 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. An Environmental Audit Report must be submitted to the Competent Authority every two (2) years for the duration of the development/construction phase. A final Environmental Audit Report must be submitted to the Competent Authority within three (3) months of the completion of the construction / development phase. 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.	
14	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 commencement of development	Non Compliant The riparian habitat of the delineated watercourse has not

	activities and must remain visible for the duration of the construction phase of the proposed development.	been demarcated to date, and should please be done.
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. 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.	In Progress The developer would like to plant Syzygium hedging, the hedges are indigenous and would supply sufficient visual screening. The contractor should please plant the hedging as soon as possible.
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.	Noted No waste was seen on site.
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.	Compliant No surface or groundwater has been polluted on site
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.	Compliant No dust was seen on site during the audit, the contractor is reminded to please supply dust suppression on site.

19	Employment opportunities must be afforded to the local community (as far as possible) during all phases of the proposed development.	Compliant All the workers on site are living on the Farm.
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GENERAL FINDINGS DURING SITE VISIT ON THE 10TH OF SEPTEMBER 2024

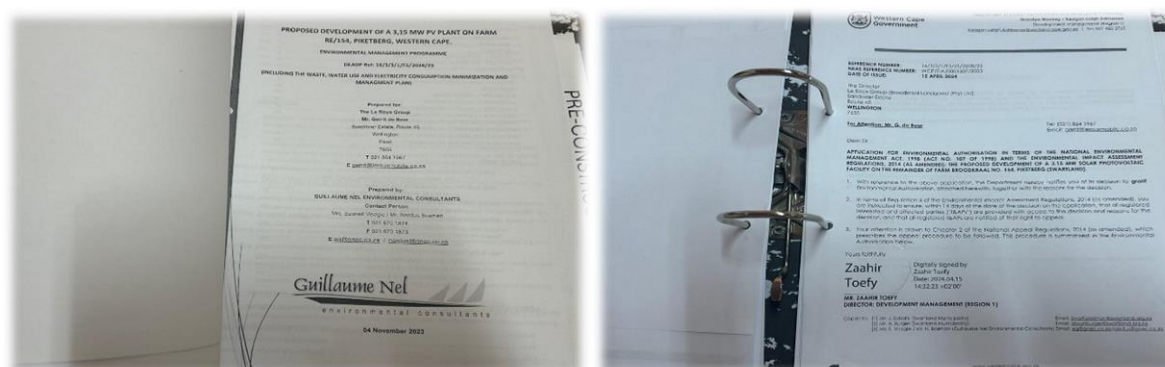
Environmental File

According to condition 11 of the EA, 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.

Compliance:

All the necessary documents were observed in the site file, thank you for that.

An Environmental Induction should please be done on site.



Method Statements

All the necessary method statements should please be submitted to the ECO.

No-Go areas

Topsoil stockpiles are to be demarcated with danger tape and seen as no-go areas.

All construction activities must remain within the boundaries of the development area, as demarcated at the start of the construction phase. The construction footprint must be kept to a minimum by constructing boundaries and demarcated around areas not to be disturbed.

These No-go areas must be demarcated with fencing / warning tape and signs before any construction activities commence.

The riparian area should be demarcated before commencement of construction activities.

Compliance:

No topsoil was seen on site.

The riparian area should please be demarcated as soon as possible



Spoil areas

Please ensure that any proposed spoil areas (other than approved landfill sites) are scanned and approved by the ER and ECO prior to the commencement of spoiling. The scanning is to ensure that no environmental legislation is contravened with the spoiling of the material.

Compliance:

No spoil areas were proposed yet.

Stockpile areas

Please ensure that any proposed stockpile areas (especially where clearance of vegetation is required) are scanned and approved by the ER and ECO prior to the commencement of clearance. The scanning is to ensure that no environmental legislation is contravened at the proposed stockpile areas. This includes proposed topsoil stockpile areas.

Compliance:

No stockpile areas have been proposed to date.

The contractor is advised to please inform the ER and ECO of potential stockpile areas prior to the start of using the area.

Topsoil

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 of vegetation of disturbed areas. All topsoil should be windrowed (preferred option) or stockpiled and

be reinstated after construction. Please ensure that topsoil is not contaminated with construction material. If topsoil is to be stockpiled the stockpiles may not be higher than 2m, to prevent the crushing of seeds.

Compliance:

The topsoil is not going to be stripped on site.

Fuel storage

If fuel is to be stored on site, the bowser and or tank will be maintained by the fuel supplier and/or contractor and is to be kept clean and leak free. The bowser is to be kept on site with a drip tray at all times or bunded to 110% if it is a large tank. Please ensure that drip trays are used during the refuelling of construction plant and placed underneath compressors, generators and stationary machinery.

Compliance:

No large-scale fuel storage is proposed according to the knowledge of the ECO.

Dust/mud

Dust suppression needs to be monitored and applied at areas where activities are currently active. Please ensure that roads under traffic surrounding the site must please be regularly cleaned to ensure that construction related sand/mud does not cause a danger to traffic.

Compliance:

Dust was not an issue during the audit, but dust suppression should please be done on dry days.



Cement

Small- and large-scale cement batching must be done on mortarboards and/or on plastic sheeting that serves an impermeable surface to prevent cement water from infiltrating the soil. Please ensure that mortarboards and plastic sheeting is properly positioned to prevent any surface runoff. No cement batching may be done directly on the soil as cement water is highly alkaline and may change the pH of the soil causing decreased soil fertility. Mostly ready-mix concrete should preferably be used on

site. The entire site must be monitored for any concrete spillages, all spillages must be disposed of at a registered Waste Landfill site. No concrete spillages/remains may be spoiled on site. No washing of concrete truck chutes is allowed on site without the proper impermeable sump area.

Compliance:

Batching was active in the mixer during the audit, the contractor was advised to please ensure that the mixer is placed on an impermeable area, and has since been done.



Litter

An integrated litter management approach, which is based on waste minimization and incorporated reduction, recycling, re-use and disposal, must be implemented where appropriate.

All construction litter must be placed within a litter structure, skips or bins. The litter structures must be properly enclosed to prevent any litter from blowing around on site. Please monitor the soil around the enclosure for any excessive cement water potentially flowing into the surrounding natural vegetation.

Please ensure that empty cement bags are removed to the site camp on the day they were used. Please ensure that empty cement bags (when placed in a litter structure) is placed in black bags prior to being stored in the litter structure to prevent any cement leaching from the empty bags. Please ensure that regular chicken parades are done to remove litter.

Please try to limit the usage of danger tape and rather use colourful rope, colourful droppers or netting as demarcation method as danger tape tears very easily in windy conditions and becomes a maintenance issue.

Please forward recycling, disposal etc. proof to the ECO for record keeping.

Compliance:

No construction related litter was noted laying around during the audit.

Bins have been placed in the site camp, thank you for that.

Rubble

An integrated rubble management approach, which is based on waste minimization and incorporated reduction, recycling, re-use and disposal, must be implemented where appropriate.

The contractor was advised to stockpile their rubble to be removed from site in a secure location to minimize the spread thereof. Any bitumen products/milled asphalt are hazardous waste and must be disposed at a registered Hazardous waste facility or reused. Concrete rubble may be disposed at a general waste facility. Please ensure that rubble is stockpiled in a secure location and removed regularly. Please forward recycling, disposal etc. proof to the ECO for record keeping.

Compliance:

No rubble was observed during the audit.

The contractor was advised to please ensure that the rubble is disposed appropriately if not reused. Please forward rubble disposal receipts to the ECO for record keeping.

Erosion and sedimentation control

Sediment traps have to be utilized during all dewatering activities or works within watercourses to prevent siltation of watercourses. Sediment traps either have to partially filter the suspended solids or allow settlement in a manageable location. Please ensure that sediment traps are being used during dewatering activities and that sediment traps are used during the works within watercourses.

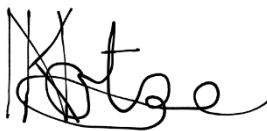
Compliance:

No dewatering was done during the audit.

CONCLUSION

No major findings were noted during the audit other than the general findings above.

Compiled by:



Nica Kotze

for GNEC