

# **ECO REPORTS**

**2025**

**JANUARY 2025**



---

# ECO MONTHLY ENVIRONMENTAL MONITORING REPORT

Virginia Photo Voltaic (PV) Solar Facility 1, 2 and 3,  
Matjhabeng, Lejweleputswa District Municipality within  
the jurisdiction of the Free State Province.

January 2025

---

**PREPARED FOR:**

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

Department of Forestry, Fisheries, and the Environment: Compliance Monitoring

**DATED:**

January 2025

**PREPARED BY:**

NCC Operations

**T** • 021 702 2884

**E** • [info@ncc-group.co.za](mailto:info@ncc-group.co.za)

T • +27 21 702 2884  
E • [info@ncc-group.co.za](mailto:info@ncc-group.co.za)

26 Bell Close, Westlake Business Park  
Westlake 7945, Cape Town

**NCC Operations (Pty) Ltd.** | Reg No: 2012/057432/07 | VAT Reg: 4220281432

## DECLARATION OF INDEPENDENCE

I, Jennipher Sakaunda, as duly authorised representative of NCC Operations (Pty) Ltd ("**NCC**"), hereby confirm my independence (as well as that of NCC) as an auditor and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which URSA Energy (Pty) Ltd has appointed NCC as Environmental Control Officer ("**ECO**"), other than fair remuneration for worked performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'J Sakaunda', is positioned below the 'Signed:' text.

**Jennipher Sakaunda**

05 February 2025

Environmental Control Officer

NCC Operations (Pty) Ltd

## **LIABILITY DISCLAIMER AND CONFIDENTIALITY CLAUSE**

All inspections conducted, as well as reports and recommendations provided by NCC are purely advisory. They are primarily intended for the purpose of assisting clients in loss control, risk management as well as health, safety, and environmental procedures.

Observations and recommendations are the result of practices and conditions observed, and information made available to us in various forms at the time of our visit. They do not purport to refer to or guarantee compliance with local or government regulations which may be applicable to such practices and conditions. This report should not be considered a definitive listing of all existing risks nor an absolute solution to all indicated risks, or hazards present from time to time in the Client Organisation. The report should always be considered in its entirety; individual sentences, paragraphs or sections of the report should not be used in isolation.

This report should not be reproduced except in its entirety, including this liability disclaimer or contents reproduced or disclosed to any third party without the prior written approval of NCC.

NCC assumes no responsibility for any losses incurred as a result of the implementation, management, and operation of recommended health, safety and environmental systems, processes and procedures.

## DOCUMENT CONTROL

|                     |                                                         |
|---------------------|---------------------------------------------------------|
| <b>REPORT TITLE</b> | Monthly ECO Environmental Monitoring Report             |
| <b>PROJECT</b>      | Virginia Solar PV 1, 2, 3 and Associated Infrastructure |
| <b>LOCATION</b>     | Free State Province                                     |
| <b>EA HOLDER</b>    | URSA Energy (Pty) Ltd                                   |
| <b>ECO</b>          | NCC Operations (Pty) Ltd                                |
| <b>REVISION</b>     | 00                                                      |
| <b>DATE</b>         | 05/02/2025                                              |

| Revision | Date       | Description                  |
|----------|------------|------------------------------|
| Rev 00   | 05/02/2025 | First Draft - Internal       |
| Rev 01   | 09/02/2025 | Final - Authority submission |

## REPORT DISTRIBUTION LIST

| Name                   | Organisation                      | Issued     | Format     |
|------------------------|-----------------------------------|------------|------------|
| Janine Brasington      | Red Rocket South Africa (Pty) Ltd | 05/02/2025 | Electronic |
| Serina Pillay          | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Maggie Logan           | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Director of Compliance | DFFE                              | 09/02/2025 | Electronic |

## TABLE OF CONTENTS

### 1 CONTENTS

|                                                     |           |
|-----------------------------------------------------|-----------|
| <b>ABBREVIATIONS.....</b>                           | <b>8</b>  |
| <b>2 INTRODUCTION .....</b>                         | <b>9</b>  |
| 2.1 Background.....                                 | 9         |
| 2.2 Audit Scope and Purpose.....                    | 11        |
| 2.3 Monitoring Frequency and Reporting.....         | 11        |
| <b>3 AUDITOR BACKGROUND.....</b>                    | <b>12</b> |
| <b>4 GENERAL (NOTABLE EVENTS) .....</b>             | <b>13</b> |
| 4.1 General Outstanding matters .....               | 13        |
| 4.2 Audits (Internal and External) .....            | 13        |
| <b>5 WASTE MANAGEMENT .....</b>                     | <b>14</b> |
| 5.1 Domestic/ General Waste .....                   | 14        |
| 5.2 Hazardous waste .....                           | 14        |
| 5.3 Wastewater .....                                | 14        |
| <b>6 PROTECTIVE MEASURES.....</b>                   | <b>15</b> |
| 6.1 General.....                                    | 15        |
| <b>7 ENVIRONMENTAL CONSERVATION.....</b>            | <b>16</b> |
| 7.1 Conservation of Flora and Fauna .....           | 16        |
| 7.2 Water Management.....                           | 16        |
| 7.3 Soil Management.....                            | 16        |
| <b>8 INFRASTRUCTURE MANAGEMENT.....</b>             | <b>17</b> |
| 8.1 Access Roads .....                              | 17        |
| 8.2 Fences, Gates, and Barricading.....             | 17        |
| 8.3 Buildings and Structures .....                  | 17        |
| <b>9 SOCIAL RESPONSIBILITY .....</b>                | <b>18</b> |
| <b>10 ENVIRONMENTAL AWARENESS AND TRAINING.....</b> | <b>18</b> |
| <b>11 HERITAGE .....</b>                            | <b>18</b> |

|           |                                                        |           |
|-----------|--------------------------------------------------------|-----------|
| <b>12</b> | <b>WARNING &amp; NCRS .....</b>                        | <b>18</b> |
| <b>13</b> | <b>REHABILITATION .....</b>                            | <b>19</b> |
| <b>14</b> | <b>INCIDENTS AND ACCIDENTS .....</b>                   | <b>20</b> |
| <b>15</b> | <b>MEETINGS AND OTHER CORRESPONDANCE.....</b>          | <b>20</b> |
| <b>16</b> | <b>AUDIT METHODOLOGY .....</b>                         | <b>21</b> |
| 16.1      | Audit Process .....                                    | 21        |
| 16.2      | Observation and Recommendation Determination .....     | 21        |
| 16.3      | Findings .....                                         | 22        |
| 16.4      | Audit Tables and Compliance Ratings.....               | 22        |
| <b>17</b> | <b>ASSUMPTIONS AND LIMITATIONS.....</b>                | <b>23</b> |
| <b>18</b> | <b>CONSULTATION PROCESS.....</b>                       | <b>23</b> |
| <b>19</b> | <b>FINDINGS.....</b>                                   | <b>24</b> |
| 19.1      | Minor improvements required.....                       | 24        |
| 19.2      | Major improvements required.....                       | 24        |
| <b>20</b> | <b>AUDIT SUMMARY .....</b>                             | <b>25</b> |
| <b>21</b> | <b>RECOMMENDATIONS.....</b>                            | <b>27</b> |
| <b>22</b> | <b>CONCLUSION .....</b>                                | <b>27</b> |
|           | <b>ANNEXURE A – CONCERNS/COMPLAINTS REGISTER .....</b> | <b>29</b> |
|           | <b>ANNEXURE B - NCR REGISTER.....</b>                  | <b>30</b> |
|           | <b>ANNEXURE C - INCIDENT REGISTER.....</b>             | <b>31</b> |
|           | <b>THIS PAGE WAS INTENTIONALLY LEFT BLANK .....</b>    | <b>37</b> |



## TABLE OF FIGURES

|                                                                      |    |
|----------------------------------------------------------------------|----|
| Figure 1: Excessive dust being generated.....                        | 33 |
| Figure 2: Oil Spillage.....                                          | 33 |
| Figure 3: Standing Equipment with drip trays.....                    | 34 |
| Figure 4: Fuel wood that can be given to the local communities ..... | 34 |
| Figure 5: Open trenches must be barricaded.....                      | 35 |
| Figure 6: Stockpile height exceeding 2m. ....                        | 35 |
| Figure 7: Bins and Spill Kit onsite .....                            | 36 |

## ABBREVIATIONS

|             |                                                         |
|-------------|---------------------------------------------------------|
| <b>BAR</b>  | Basic Assessment Report                                 |
| <b>CA</b>   | Competent Authority                                     |
| <b>DEA</b>  | Department of Environmental Affairs (now DFFE)          |
| <b>DFFE</b> | Department of Forestry, Fisheries, and the Environment  |
| <b>DWS</b>  | Department of Water and Sanitation                      |
| <b>EA</b>   | Environmental Authorisation                             |
| <b>EAP</b>  | Environmental Assessment Practitioner                   |
| <b>ECO</b>  | Environmental Control Officer                           |
| <b>EIA</b>  | Environmental Impact Assessment                         |
| <b>EMPr</b> | Environmental Management Programme                      |
| <b>EO</b>   | Environmental Officer (Contractor)                      |
| <b>ER</b>   | Employer's Representative                               |
| <b>ESCO</b> | Environmental Site Compliance Officer                   |
| <b>kV</b>   | Kilovolt                                                |
| <b>MVA</b>  | Megavolt Amperes                                        |
| <b>MW</b>   | Megawatt                                                |
| <b>NCC</b>  | NCC Environmental Services                              |
| <b>NCR</b>  | Non-Compliance Report                                   |
| <b>NEMA</b> | National Environmental Management Act (No. 107 of 1998) |
| <b>NWA</b>  | National Water Act (No. 36 of 1998)                     |
| <b>OHPL</b> | Overhead Power Line                                     |
| <b>SDC</b>  | Safe Disposal Certificate                               |
| <b>SHE</b>  | Safety, Health, and Environment                         |
| <b>SS</b>   | Substation                                              |
| <b>TBC</b>  | To Be Confirmed                                         |
| <b>WEF</b>  | Wind Energy Facility                                    |

## 2 INTRODUCTION

### 2.1 Background

NCC Operations (Pty) Ltd (**"NCC"**) was appointed by URSA Energy (Pty) LTD (**"URSA"**) to provide a suitably experienced independent Environmental Control Officer (**"ECO"**) for the construction phase of Virginia Solar Park which will be connected to the Eskom Theseus Main Transmission Substation (MTS). The site is located on Farm Blomskraal 216, Ventersburg RD located within the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province. On completion the facility will consist of the Photovoltaic (PV) Power Plant with a maximum generation capacity up to 100 MW, a 132kV powerline connecting the substation to the Eskom Theseus substation which is located 16.2 km North-East of the north-western corner of project site.

The ECO has the responsibility of ensuring the mitigation/ rehabilitation measures and conditions referred to in the Environmental Authorisation (**"EA"**) are implemented, as well as ensuring compliance with the requirements of the Environmental Management Programme (**"EMPr"**). This report provides an insight into the overall compliance performance and a summary of other environmental concerns and potential environmental risks through observations during site inspections.

This report is based on the following environmental conditions or requirements:

- a) Environmental Authorisations (EA)
  - 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
  - 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
  - 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)
  - 4) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
  - 5) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)
- b) Environmental Management Programmes (EMPr)
- c) Relevant environmental legislation.
- d) All other environmental permits, licenses, and authorisations.

The notification of commencement of construction was submitted to the DFFE for Virginia Solar Plant (Pty) Ltd on the 02 May 2024.

This report addresses conditions set out in the EA which states the ECO as part of their duties: *"The ECO must keep record of all activities on site, problems identified, transgressions noted, and a task schedule of tasks undertaken by the ECO."* As per the roles and responsibilities in the Virginia Solar Project (**"VSP"**) EMPr, the primary role of the ECO will

be to monitor the construction activities and ensure that the mitigation measures of the EMPr and Environmental Authorisations (EA) are implemented. This report also includes an audit checklist for the VSP EA as follows:

- 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
- 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
- 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)
- 4) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
- 5) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)

A summary of the various environmental requirements i.e. the audit criteria relating to the overall project is provided in **Table 1**.

**Table 1:** Summary of environmental requirements / criteria relating to the overall project.

| Components of overall project         | Environmental requirements / criteria |               |                             |          |
|---------------------------------------|---------------------------------------|---------------|-----------------------------|----------|
|                                       | DFFE EA Ref No.                       | Issue date    | Approved EMPr (Compiled by) | Date     |
| Virginia 1 Solar Park                 | 14/12/16/3/3/2/2099/1                 | 20 April 2022 | AGES Limpopo (Pty) Ltd      | Jan 2022 |
| Virginia 2 Solar Park                 | 14/12/16/3/3/2/2100                   | 20 May 2022   | AGES Limpopo (Pty) Ltd      | Jan 2022 |
| Virginia 3 Solar Park                 | 14/12/16/3/3/2/2101                   | 20 April 2022 | AGES Limpopo (Pty) Ltd      | Feb 2022 |
| Virginia Solar Park Switching Station | 14/12/16/3/3/2/2099/2                 | 20 April 2022 | AGES Limpopo (Pty) Ltd      | Jan 2022 |
| Virginia Solar Park OHPL              | 14/12/16/3/3/1/2444                   | 02 Feb 2022   | AGES Limpopo (Pty) Ltd      | Dec 2021 |

This report represents the monitoring for the Construction Phase. The responsibility of enforcement of the conditions of the EAs and EMPrs lies with the Project and Project Manager, while the Department of Forestry, Fisheries, and the Environment (“**DFFE**”) Environmental Management Inspectorate (“**EMI**”) may also enforce existing and potentially new conditions through compliance notices.

An Environmental Site Compliance Officer (“**ESCO**”) has been appointed by the holder of the EA to monitor the project compliance onsite on a full-time basis on behalf of the EA holder. The responsibilities of the ESCO includes:

- Monitoring conditions of the Basic Assessment Reports (“**BARs**”), Environmental Impact Report (**EIR**) EAs and the EMPrs.
- Ensuring compliance with all relevant environmental legislation.
- Approving method statements (reviewed by the ECO and co-approved by Site Manager).
- Remaining employed until the completion of the construction activities.

- Reporting to the Project Manager, including all findings identified onsite.
- Reporting any significant findings to the ECO.
- Preparing and submitting monthly reports to the ECO and Project Manager.
- Monitoring compliance by the Contractor.

In addition, the ESCO will:

- Undertake daily inspections of the site and surrounding areas.
- Audit compliance with the EMPr and conditions of the environmental authorisation.
- Take appropriate action if the specifications contained in the EMPr and conditions of the environmental authorisation are not followed.
- Monitor and verify that environmental impacts are kept to a minimum, as far as possible; and
- Ensure that activities onsite comply with all relevant environmental legislation.

## **2.2 Audit Scope and Purpose.**

In accordance with Regulation 34 of the 2014 NEMA EIA Regulations (as amended) the holder of an environmental authorisation must, for the period during which the EA and EMPr, and where applicable the closure plan, remain valid —

- a) Ensure that the compliance with the conditions of the EA and the EMPr, and where applicable the closure plan, is audited; and*
- b) Submit an environmental audit report to the relevant competent authority.*

The purpose of this environmental audit is to verify compliance to the overarching environmental requirements specified as conditions of the EAs and EMPrs, and report on the extent to which the objectives of the EMPrs are being achieved.

## **2.3 Monitoring Frequency and Reporting.**

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 27<sup>th</sup> of January 2025 after which this report was compiled which serves to document and record the audit proceedings and observations and provide recommendations and conclusions in relation to the audit. This report covers the monthly reporting for the month of January 2025.

### 3 AUDITOR BACKGROUND.

NCC is a multi-disciplinary environmental consulting company based in South Africa which adopts a 'values driven' approach with a common purpose to conserve and create sustainable environments that enable people, planet and business to thrive. We are a trusted partner to major engineering and construction firms, mines, parastatals, film, sports and event production companies, municipalities, provincial and national government, and conservation organisations. Drawing on our years of experience on a wide range of projects, NCC works with our clients to develop, implement, and monitor customised services that add real value.

The auditor, Jennipher Sakaunda, is a senior environmental manager with more than 14 years' experience currently employed with NCC. Jennipher Sakaunda has experience in several environmental fields including environmental compliance monitoring and auditing, due diligence assessment, environmental impact and risk assessment, and compilation of environmental management plans/programmes.

**Table 2:** Details of the auditor.

|                       |                                                                                                                                                                                                |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Company</b>        | NCC Operations (Pty) Ltd                                                                                                                                                                       |
| <b>Auditor</b>        | Jennipher Sakaunda                                                                                                                                                                             |
| <b>Tel</b>            | +27 21 702 2884                                                                                                                                                                                |
| <b>Mobile</b>         | +27 69 510 7630                                                                                                                                                                                |
| <b>Email</b>          | <a href="mailto:jenniphers@ncc-group.co.za">jenniphers@ncc-group.co.za</a>                                                                                                                     |
| <b>Address</b>        | 26 Bell Close, Westlake Business Park Westlake, 7945                                                                                                                                           |
| <b>Affiliation</b>    | International Association of Impact Assessment South Africa.<br>Environmental Assessment Practitioner Association of South Africa.<br>South African Council of Natural Scientific Professions. |
| <b>Qualifications</b> | BSc (honors) Environmental Management                                                                                                                                                          |
| <b>Expertise</b>      | A detailed CV can be provided on request.                                                                                                                                                      |

## 4 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (January 2025) included the following:

- Pull out tests (Concrete Casting, Axial and Lateral).
- Fencing
- Site Establishment
- Demarcation of sensitive sites
- Constructing the access roads
- Site clearing
- Topsoil stock piling

### 4.1 General Outstanding matters

Any major outstanding matters are to be recorded and summarised in the Concerns Register (**Annexure A**). The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

### 4.2 Audits (Internal and External)

Internal audits are undertaken monthly by the Red Rocket ESCO. This Audit was undertaken on the 27<sup>th</sup> of January 2025. Audit tables/checklists are available on request. The ECO undertakes external monthly audits.

## 5 WASTE MANAGEMENT

The contractor must make provision for waste avoidance, minimisation, and separation of waste where possible through recycling efforts. Waste management awareness must be done on an ongoing basis and must be provided through toolbox talks and awareness posters.

### 5.1 Domestic/ General Waste

Approximately 5286 kg of general waste was generated on site in the month of January 2025. General waste bins are provided at the site camp. An estimated 4.8 tonnes of rubble were generated on site. This rubble came from the concrete tank that was demolished on site. The service providers dispose the general waste at Matjhabeng Local Municipality waste disposal site-Licence number: B33/2/340/21/P8 16/2/7/C404/D2/Z1/P367. Proof of disposal is available on request.

### 5.2 Hazardous waste

Approximately of 2 400 kg hazardous wastes were removed from Site, this constituted mostly the soil that was contaminated by the oil spillage. Approximately 20l of hydraulic oil spilled from a tipper truck. Spoiled soil must be removed immediately, and the areas be backfilled with clean soil. Spoiled soil must be kept in a sealed container and only be disposed at a registered landfill site. The spoiled soil was disposed at Vlakfontein Waste Management Facility which is a registered landfill site.

### 5.3 Wastewater

Approximately 3329 L of sewerage waste was generated on site in the month of January 2025. Chemical toilets are provided onsite. The Appointed Service Provider removes sewage and dispose of it at Matjhabeng Local Municipality wastewater treatment facility - Licence No: 10/D4/J/G/2082. Proof of disposal is available onsite. The contractor must ensure the appointed service provider is licenced to provide sewer removal services. Additionally, adequate ablution facilities must be always provided.



## 6 PROTECTIVE MEASURES

### 6.1 General

Protective measures have been deployed to mitigate environmental impacts or prevent impacts from occurring which includes:

- Security guards are present on the site, with access control in place.
- Induction training is conducted for all persons working and visiting the site.
- Snake gaiters are provided.
- Spill kits.
- No-go areas are demarcated and provided with signage.
- Access cards

## **7 ENVIRONMENTAL CONSERVATION**

### **7.1 Conservation of Flora and Fauna**

A permit to clear the site and relocate species of concern was received from the Free state Department of Economic, Small Business Development, Tourism and Environmental Affairs. The permit with Ref No. 202306000012649 was issued on 08/06/2023 to pluck protected and unprotected flora. Search and rescue of protected plants is ongoing. Rescued plants have been replanted on the farm where they will not be harmed by construction activities an where it was deemed suitable habitat for those species occurred. The locations of the rescued plants are known to the ESCO's and kept on file.

### **7.2 Water Management**

Approximately 421 m<sup>3</sup> of water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The pipe burst on site resulted in water leakage was recorded onsite. The contactor must ensure water abstraction does not exceed the licenced volumes.

### **7.3 Soil Management**

As site establishment and works commence onsite, the contractor must ensure that no concrete is mixed directly onto the ground. Concrete must be mixed on trays or on a concrete slab to prevent soil pollution. Oil leakages from vehicles must be prevented by ensuring all standing vehicles are equipped with drip trays and leaking vehicles are removed from site for repair. No repairs of vehicles must be done onsite.

## **8 INFRASTRUCTURE MANAGEMENT**

### **8.1 Access Roads**

The project team is using existing farm roads for current construction activities until such time as the project access roads and internal roads have been constructed. The existing access roads must be maintained. While waiting for the access road to be constructed the contractor must desist from driving on the veld unnecessary.

### **8.2 Fences, Gates, and Barricading**

N/A.

### **8.3 Buildings and Structures**

N/A.

## 9 SOCIAL RESPONSIBILITY

Any complaints from the public are to be recorded on complaints register maintained by the Contractor whose responsibility it is to track and resolve the complaints/issues that are raised. In addition, a box for receiving internal grievances is present at the main site office facility which allows for project staff to bring to the attention of the project management team any comments and or concerns.

## 10 ENVIRONMENTAL AWARENESS AND TRAINING

The contractor has undertaken Toolbox talks for the month of **January 2025** covering the following topics:

- Demarcated No Go Areas & designated Smoking Areas
- Pollution Prevention
- Environmental Induction
- Environmental induction
- Wildlife Management Plan
- Reporting Environmental Incidents
- Hazardous Chemical Plan
- Complying with Safety & Environment procedures
- Topsoil Management
- Reporting Environmental Incidents
- Incorrect disposal of waste
- House Keeping + Fauna & Flora
- Wildlife
- Reporting Environmental Incidents

## 11 HERITAGE

The contractor has cleared vegetation encroaching into the 50m buffer between the graves. The contractor must rehabilitate the buffer area and demarcate the graves as a sensitive- and no-go area.

## 12 WARNING & NCRS

One non-conformance report ("**NCRs**") was issued by the ESCO during the month of January 2025. On the 14<sup>th</sup> of January 2025 water leak was observed at the TSF Water Storage Tank. Damages to the bottom threaded connection resulted in the spillage as far as approximately 20 000l from the tank. The contractor failed to formally communicate the incident, resulting in the issuing of the NCR.

## 13 REHABILITATION

No rehabilitation works have commenced during this period, further rehabilitation is expected to occur on the project as other works have been completed. The area that was cleared that falls within the 50 m buffer of the graves must be rehabilitated accordingly.

## 14 INCIDENTS AND ACCIDENTS

All environmental related events, incidents and accidents are to be reported directly to the ECO and kept on a central register and included in the monthly report. No environmental incidents were observed during this period. A template of the ECO incident register is attached as **Annexure C**.

## 15 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 27<sup>th</sup> of January 2025 with observations documented in this report. Monthly ECO compliance reports are submitted to the Department (DFFE) by the ECO.

## 16 AUDIT METHODOLOGY

This section provides an overview of the methods employed in making observations and providing recommendations and conclusions derived from the audit procedures undertaken.

### 16.1 Audit Process

The site visit, data reviews and report drafting were undertaken by the ECO/auditor. The audit included the following procedures:

- Site Inspections. The areas and aspects covered during the inspections with concurrent discussions with the ESCO and site-based representatives of the EA holder included *inter alia*:
  - i. Access control to the sites.
  - ii. Ecologically sensitive areas, where applicable.
  - iii. Waste management.
  - iv. Incident and complaints management.
  - v. Landowner relations.
  - vi. Infrastructure management.
  - vii. Stormwater and erosion control and management.
  - viii. Environmental Awareness.
  - ix. Record-keeping and document control.
- Documentation review. This included:
  - i. A review of the EAs, EMPs and where applicable, method statements.
  - ii. A review of previous audit reports, records, observations, and findings.
  - iii. A review of any remedial and/or protective measures implemented.
  - iv. Identification, if applicable, any gaps requiring action and/or rectification.
- Audit Report compilation. This included:
  - i. Recording any observations and findings identified during the audit.
  - ii. Providing recommendations relating to improvement or non-compliance, if and where applicable.

### 16.2 Observation and Recommendation Determination

Observations and subsequent recommendations were based on and are limited to the following:

- i. Available documentation and records viewed or received prior, subsequent, or during the site visit;
- ii. Observations made during the period that the ECO/auditor was on site; and
- iii. Information received from both direct and cross-referenced discussions with permanent site-based staff.

### 16.3 Findings

Any key findings highlighted in this report will indicate areas and/or aspects that require improvement or rectification. The purpose of summarising the findings is to allow the EA holder to identify common management challenges that effect the level of compliance to the conditions of the EAs and EMPs.

Where findings and recommendations pertaining are deemed significant through compliance status or performance, they are documented as specific issues in the report. All site-specific observations are recorded in the corresponding audit checklist tables **(these are available upon request)**.

### 16.4 Audit Tables and Compliance Ratings

The audit table captures observations and recommendations made in relation to the conditions stipulated in the EAs and EMPs. It provides the reader with more detailed information in terms of what the stipulated requirements are in relation to the organisation's assessed current compliance status, according to the observations recorded by the auditor.

Ratings are calculated based on a scoring system whereby each auditable condition is provided with a score as highlighted in **Table 3** below.

**Table 4:** Compliance rating and scoring.

| Status                              | Compliance Rating |        | Scoring | Description                                                                                                                                                                                |
|-------------------------------------|-------------------|--------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | Abbreviation      | Symbol |         |                                                                                                                                                                                            |
| <i>Compliant</i>                    | C                 | ✓✓     | 2       | <i>No improvements required</i>                                                                                                                                                            |
| <i>Partially Compliant</i>          | PC                | ✓      | 1       | <i>Minor improvements required</i>                                                                                                                                                         |
| <i>Non-Compliant</i>                | NC                | x      | 0       | <i>Major improvements required</i>                                                                                                                                                         |
| <i>Not Applicable / Not Audited</i> | NA                | -      | -       | <i>No improvements required and / or the condition is either not, not yet or no longer relevant at the time of the audit</i>                                                               |
| <i>Informative</i>                  | info              | -      | -       | <i>These relate to informative elements that provide either useful information or are descriptive in the explanation and understanding of statements or concepts in the audit criteria</i> |

Each condition has been ascribed a colour-coded status indicator of Compliant (green), Partially Compliant (orange), non-compliant (red), Not Auditable/Audited (grey) and Informative (blank/white) to assist the reader in determining aspects that require attention to improve on compliance achieved, if and where applicable. No compliance scoring is attributed any of the audit criteria information pertaining to the latter two audit status symbols, namely 'NA' and



'info' as they were either not auditable and/or were not applicable/relevant at the time the audit was undertaken. In other words, they are excluded from the overall compliance rating calculations.

An overall compliance rating is calculated as a percentage to provide the reader with an overview of compliance to the relevant audit criteria however each condition should be considered on its own merits as the ratings do not necessarily portray the severity or impact of the reported finding relating to a condition.

## 17 ASSUMPTIONS AND LIMITATIONS

The ECO compliance audit and associated report are based upon the assumptions that:

- i. Documentation provided to the ECO/auditor is factual and true.
- ii. The audit is based purely on the conditions as stipulated in the EAs and EMPs.
- iii. The construction phase is currently underway and operational phase activities are not applicable.
- iv. Documentation / reports were randomly sampled / reviewed in order to accommodate time constraints.
- v. Where visual observations were not possible either due to physical access constraints or safety constraints, the ECO/auditor used other means to determine compliance, either through requesting written evidence provided by contractors / service providers who service the site or via interviews with technical site-based staff.

## 18 CONSULTATION PROCESS

The approach of consultation followed during the environmental audit was based on written (email) and telephonic correspondence between the ECO/auditor and the Environmental Site Compliance Officer which also includes consultation and communication with the EA holder and competent authority in terms of report submission.

## 19 FINDINGS

Findings are listed in the attached checklists, and it should be noted that findings should be considered individually in the context of the full audit and each condition and associated rating. At this early stage during the construction phase of the VSP and associated infrastructure most of the aspects are not applicable including closure and rehabilitation. The following non compliances were noted onsite:

- Dust
- Oil spillages.
- Stockpile exceeding 2m in height.
- Unbarricaded trenches.

Based on the outcomes of the audit it was established that the objectives of the EAs and EMPs were achieved in terms of:

- i. *Sufficiently providing for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis;*
- ii. *Ensuring compliance with the provisions of environmental authorisation and EMPs.*

### 19.1 Minor improvements required.

- Waste separation on some sites.

### 19.2 Major improvements required.

- Rehabilitation of the no-go areas near the burial site.
- Limiting the clearance of vegetation to areas that will be developed in two months and phasing the clearance of vegetation.
- Dust suppression.

## 20 AUDIT SUMMARY

In terms of the findings and results of the **January 2025** ECO audit, the project achieved an overall **98%** compliance rating with the conditions of the EAs and EMPs.

Table 4: Compliance Scoring

| Virginia, Solar Park 1,2,3, Virginia Solar Park and Virginia OHPL, Free State Province |                                                                                                            |               |                          |                    |                                   |                                       |
|----------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------|--------------------------|--------------------|-----------------------------------|---------------------------------------|
| No.                                                                                    | Audit criteria                                                                                             | Compliant (C) | Partially Compliant (PC) | Non-Compliant (NC) | Not Applicable / Not Audited (NA) | Normative (info)                      |
| 1                                                                                      | Environmental Authorisation for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)                 | 39            | 0                        | 3                  | 7                                 | 0 (100%)                              |
| 2                                                                                      | Environmental Authorisation for Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)                   | 32            | 1                        | 3                  | 5                                 | 0 (99.8%)                             |
| 3                                                                                      | Environmental Authorisation for Virginia 3 Solar Park (DFFE REF NO: 14/12/16/3/3/2/2101)                   | 35            | 1                        | 3                  | 0                                 | 0 (99%)                               |
| 4                                                                                      | Environmental Authorisation for Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2) | 41            | 0                        | 0                  | 7                                 | 1 (99%)                               |
| 5                                                                                      | Environmental Authorisation for Virginia Solar Park OHPL (DFFE REF NO: 14/12/16/3/3/1/2444)                | 38            | 2                        | 0                  | 5                                 | 0 (95%)                               |
| 6                                                                                      | EMPr for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)                                        | 60            | 1                        | 0                  | 300                               | 0 (99%)                               |
| 7                                                                                      | EMPr Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)                                              | 50            | 3                        | 0                  | 321                               | 0 (99%)                               |
| 8                                                                                      | EMPr Virginia 3 Solar Park (DFFE REF NO: 14/12/16/3/3/2/2101)                                              | 10            | 1                        | 0                  | 97                                | 0 (99%)                               |
| 9                                                                                      | EMPr Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2)                            | 60            | 1                        | 0                  | 300                               | 0 (99%)                               |
| 10                                                                                     | EMPr Virginia Solar Park OHPL (DFFE REF NO: 14/12/16/3/3/1/2444)                                           | 50            | 3                        | 0                  | 321                               | 0 (99%)                               |
| Overall total no. conditions                                                           |                                                                                                            | 426           | 13                       | 0                  | 1362                              | 1 <b>1802</b>                         |
| Audited conditions                                                                     |                                                                                                            | 426           | 13                       | 0                  | -                                 | - <b>493</b><br>(Potential max score) |
| Scoring symbol                                                                         |                                                                                                            | ✓✓            | ✓                        | x                  | -                                 | -                                     |
| Total score                                                                            |                                                                                                            | 843           | 13                       | 0                  | -                                 | - <b>878</b><br>Achieved score)       |

**Overall Compliance Rating Calculation (%)**

$\{[(852+13+0)] / 878\} \times 100$

**98%**

## 21 RECOMMENDATIONS

**Based on the noncompliance identified following is recommended:**

- Clearance of vegetation must be phased to reduce the quantity of excessive dust generated.
- All the hazardous waste kept onsite must be deposited at a registered hazardous landfill site. Proof of disposal must be submitted.
- Chemical dust suppressants must be used on site. Due the extend of exposed sites using water to suppress dust will be costly.
- All standing trucks must be equipped with drip trays and spoiled materials must be scooped and stored in plastic bags before being disposed at a registered landfill site.
- All open trenches must be barricaded if there are no works being done.
- The contractor must consider donating the cut trees to the local communities instead of landfilling them.

## 22 CONCLUSION

The contractor must ensure that systems and resources to monitor and manage environmental risks and impacts adequately are in place. Resources and personnel to train employees on the contents of the EMPs must be made to ensure that the project runs effectively and efficiently with minimal impact to the biophysical and socio-economic environment.

In general, the EMPs are effective in their current format in terms of content and relevance and there are no major shortcomings. The EMP's sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with this project.

**PREPARED BY:**

A handwritten signature in dark ink, appearing to read 'Sakaunda'.

**Sakaunda Jennipher**

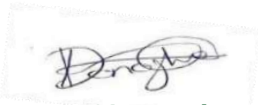
Environmental Control Officer

NCC Operations (Pty) Ltd

**M** ·069 510 7630

**E** · [jenniphers@ncc-group.co.za](mailto:jenniphers@ncc-group.co.za)

**REVIEWED BY:**

A handwritten signature in dark ink, appearing to read 'Trevor O'Donoghue'.

**Trevor O'Donoghue**

Senior Environmental Consultant

NCC Operations (Pty) Ltd

**M** ·084 465 4058

**E** ·[trevorod@ncc-group.co.za](mailto:trevorod@ncc-group.co.za)

## ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

### Open Concerns/Complaint

| No | Observation date | Concern/Complaint | Suggested Due Date <sup>1</sup> | Proposed Corrective Action | Status | Closure status |
|----|------------------|-------------------|---------------------------------|----------------------------|--------|----------------|
|    |                  |                   |                                 |                            |        |                |

*\*The concerns register is updated once the ECO is present on site.*

### Closed Concerns

| No | Observation date | Concern/Complaint | Due Date suggested by ECO | Corrective Action Taken | Outcome | Closure status |
|----|------------------|-------------------|---------------------------|-------------------------|---------|----------------|
|    |                  |                   |                           |                         |         |                |
|    |                  |                   |                           |                         |         |                |

## ANNEXURE B - NCR REGISTER

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                  | Volume  | Remedial Action                                                                                   |                                     |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|---------------------------------------------------------------------------------------------------|-------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, why did it happen?                                                                                                                                                               |         | Immediate Corrective Actions                                                                      | Preventative measures               |
| 14/01/2025 | TSF Water Storage Tank leakage                                                   | Water wastage                                                              | On the morning of 14/01/2025, a water leak was observed at the TSF Water Storage Tank. Damages to the bottom threaded connection resulted in the spillage as far as approximately 20 000l from the tank. | 20 000l | The inlet pipe was repaired; however, no official response has been received from the contractor. | Contractor must respond to the NCR. |



## ANNEXURE C - INCIDENT REGISTER

| Date           | Type                                                                                            | Impact                                                                                          | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                  | Volume        | Remedial Action                                                                                                                                                                                                                                             |                                                                                                                                                                                                        |
|----------------|-------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/<br>Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When,<br>How, Why did it<br>happen?                                                                                                                                                                                                                                                                                                                                                                                         |               | Immediate<br>Corrective<br>Actions                                                                                                                                                                                                                          | Preventative<br>measures                                                                                                                                                                               |
| 10/01<br>/2025 | Oil Spillage                                                                                    | Soil and water<br>pollution.                                                                    | On the 10 <sup>th</sup> of January 2025 when the driver of tipper truck was offloading the cylinder stander blasted then oil started to leak form the pipe. Its I suspected that the truck was overload resulting in the mechanical failure                                                                                                                                                                                              | 20<br>litters | <ul style="list-style-type: none"> <li>-The matter must be reported immediately</li> <li>- drip trays must be used to prevent further spillage on the ground.</li> <li>- spoiled oil must be removed and disposed at a registered landfill site.</li> </ul> | <ul style="list-style-type: none"> <li>-Equipment must be serviced regularly.</li> <li>- Loads must be as per the manufactures' instructions.</li> <li>- Equipment must be inspected daily,</li> </ul> |
| 10/01<br>/2025 | Water Spillage                                                                                  | Water wastage                                                                                   | On 10 January 2025 at 07:45, EO, EM & ESCO discovered a leakage during the morning walkabout. Leakage was reported to the construction team for immediate action. At 11:58, the site supervisor reported that the leak had been fixed & sent photographic proof. However, later on the day while security was patrolling the site, they discovered that the pipe had burst and there was a significate amount of water that was spilled. | 20 KL         | <ul style="list-style-type: none"> <li>-The matter must be reported immediately</li> <li>- leakage must be attended to immediately</li> </ul>                                                                                                               | <ul style="list-style-type: none"> <li>- Installation must be done by competent people.</li> <li>-The system must be monitored regularly.</li> </ul>                                                   |

## ANNEXURE D – PHOTOGRAPHS



**Figure 1:** Excessive dust being generated.

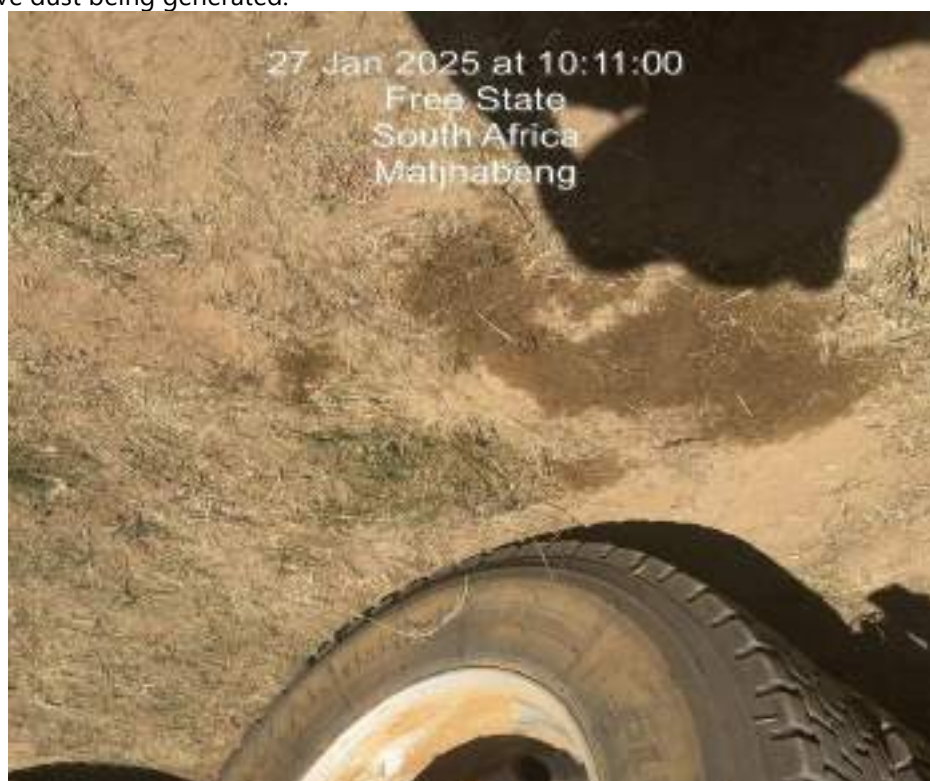


**Figure 2:** Oil Spillage



**Figure 3:** Standing Equipment with drip trays.



**Figure 4:** Fuel wood that can be given to the local communities





Figure 5: Open trenches must be barricaded.



**Figure 6:** Stockpile height exceeding 2m.



**Figure 7: Bins and Spill Kit onsite**

**THIS PAGE WAS INTENTIONALLY LEFT BLANK**

**FEBRUARY 2025**





---

# ECO MONTHLY ENVIRONMENTAL MONITORING REPORT

Virginia Photo Voltaic (PV) Solar Facility 1, 2 and 3,  
Matjhabeng, Lejweleputswa District Municipality within  
the jurisdiction of the Free State Province.

February 2025

---

**PREPARED FOR:**

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

Department of Forestry, Fisheries, and the Environment: Compliance Monitoring

**DATED:**

February 2025

**PREPARED BY:**

NCC Operations

**T** • 021 702 2884

**E** • [info@ncc-group.co.za](mailto:info@ncc-group.co.za)

## DECLARATION OF INDEPENDENCE

I, Jennipher Sakaunda, as duly authorised representative of NCC Operations (Pty) Ltd ("**NCC**"), hereby confirm my independence (as well as that of NCC) as an auditor and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which URSA Energy (Pty) Ltd has appointed NCC as Environmental Control Officer ("**ECO**"), other than fair remuneration for worked performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'J Sakaunda', is positioned below the 'Signed:' text.

**Jennipher Sakaunda**

05 March 2025

Environmental Control Officer

NCC Operations (Pty) Ltd

## **LIABILITY DISCLAIMER AND CONFIDENTIALITY CLAUSE**

All inspections conducted, as well as reports and recommendations provided by NCC are purely advisory. They are primarily intended for the purpose of assisting clients in loss control, risk management as well as health, safety, and environmental procedures.

Observations and recommendations are the result of practices and conditions observed, and information made available to us in various forms at the time of our visit. They do not purport to refer to or guarantee compliance with local or government regulations which may be applicable to such practices and conditions. This report should not be considered a definitive listing of all existing risks nor an absolute solution to all indicated risks, or hazards present from time to time in the Client Organisation. The report should always be considered in its entirety; individual sentences, paragraphs or sections of the report should not be used in isolation.

This report should not be reproduced except in its entirety, including this liability disclaimer or contents reproduced or disclosed to any third party without the prior written approval of NCC.

NCC assumes no responsibility for any losses incurred as a result of the implementation, management, and operation of recommended health, safety and environmental systems, processes and procedures.

## DOCUMENT CONTROL

|                     |                                                         |
|---------------------|---------------------------------------------------------|
| <b>REPORT TITLE</b> | Monthly ECO Environmental Monitoring Report             |
| <b>PROJECT</b>      | Virginia Solar PV 1, 2, 3 and Associated Infrastructure |
| <b>LOCATION</b>     | Free State Province                                     |
| <b>EA HOLDER</b>    | URSA Energy (Pty) Ltd                                   |
| <b>ECO</b>          | NCC Operations (Pty) Ltd                                |
| <b>REVISION</b>     | 00                                                      |
| <b>DATE</b>         | 05/03/2025                                              |

| Revision | Date       | Description                  |
|----------|------------|------------------------------|
| Rev 00   | 05/03/2025 | First Draft - Internal       |
| Rev 01   |            | Final - Authority submission |

## REPORT DISTRIBUTION LIST

| Name                   | Organisation                      | Issued     | Format     |
|------------------------|-----------------------------------|------------|------------|
| Janine Brasington      | Red Rocket South Africa (Pty) Ltd | 05/03/2025 | Electronic |
| Serina Pillay          | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Maggie Logan           | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Director of Compliance | DFFE                              |            | Electronic |

## TABLE OF CONTENTS

### 1 CONTENTS

|                                                     |           |
|-----------------------------------------------------|-----------|
| <b>ABBREVIATIONS.....</b>                           | <b>8</b>  |
| <b>2 INTRODUCTION .....</b>                         | <b>9</b>  |
| 2.1 Background.....                                 | 9         |
| 2.2 Audit Scope and Purpose.....                    | 11        |
| 2.3 Monitoring Frequency and Reporting .....        | 11        |
| <b>3 AUDITOR BACKGROUND. ....</b>                   | <b>12</b> |
| <b>4 GENERAL (NOTABLE EVENTS) .....</b>             | <b>13</b> |
| 4.1 General Outstanding matters .....               | 13        |
| 4.2 Audits (Internal and External) .....            | 13        |
| <b>5 WASTE MANAGEMENT .....</b>                     | <b>14</b> |
| 5.1 Domestic/ General Waste .....                   | 14        |
| 5.2 Hazardous waste.....                            | 14        |
| 5.3 Wastewater .....                                | 14        |
| <b>6 PROTECTIVE MEASURES.....</b>                   | <b>15</b> |
| 6.1 General .....                                   | 15        |
| <b>7 ENVIRONMENTAL CONSERVATION.....</b>            | <b>16</b> |
| 7.1 Conservation of Flora and Fauna .....           | 16        |
| 7.2 Water Management .....                          | 16        |
| 7.3 Soil Management .....                           | 16        |
| 7.4 Stormwater and Erosion onsite.....              | 16        |
| <b>8 INFRASTRUCTURE MANAGEMENT.....</b>             | <b>17</b> |
| 8.1 Access Roads.....                               | 17        |
| 8.2 Fences, Gates, and Barricading .....            | 17        |
| 8.3 Buildings and Structures.....                   | 17        |
| <b>9 SOCIAL RESPONSIBILITY .....</b>                | <b>18</b> |
| <b>10 ENVIRONMENTAL AWARENESS AND TRAINING.....</b> | <b>18</b> |
| <b>11 HERITAGE .....</b>                            | <b>18</b> |
| <b>12 WARNING &amp; NCRS .....</b>                  | <b>18</b> |

|           |                                                        |           |
|-----------|--------------------------------------------------------|-----------|
| <b>13</b> | <b>REHABILITATION .....</b>                            | <b>18</b> |
| <b>14</b> | <b>INCIDENTS AND ACCIDENTS .....</b>                   | <b>19</b> |
| <b>15</b> | <b>MEETINGS AND OTHER CORRESPONDANCE.....</b>          | <b>19</b> |
| <b>16</b> | <b>AUDIT METHODOLOGY .....</b>                         | <b>20</b> |
| 16.1      | Audit Process .....                                    | 20        |
| 16.2      | Observation and Recommendation Determination .....     | 20        |
| 16.3      | Findings.....                                          | 21        |
| 16.4      | Audit Tables and Compliance Ratings .....              | 21        |
| <b>17</b> | <b>ASSUMPTIONS AND LIMITATIONS.....</b>                | <b>22</b> |
| <b>18</b> | <b>CONSULTATION PROCESS.....</b>                       | <b>22</b> |
| <b>19</b> | <b>FINDINGS.....</b>                                   | <b>23</b> |
| 19.1      | Minor improvements required.....                       | 23        |
| 19.2      | Major improvements required.....                       | 23        |
| <b>20</b> | <b>AUDIT SUMMARY .....</b>                             | <b>24</b> |
| <b>21</b> | <b>RECOMMENDATIONS.....</b>                            | <b>26</b> |
| <b>22</b> | <b>CONCLUSION .....</b>                                | <b>26</b> |
|           | <b>ANNEXURE A – CONCERNS/COMPLAINTS REGISTER .....</b> | <b>28</b> |
|           | <b>ANNEXURE B - NCR REGISTER.....</b>                  | <b>29</b> |
|           | <b>ANNEXURE C - INCIDENT REGISTER.....</b>             | <b>30</b> |
|           | <b>THIS PAGE WAS INTENTIONALLY LEFT BLANK .....</b>    | <b>35</b> |

## TABLE OF FIGURES

|                                                                            |    |
|----------------------------------------------------------------------------|----|
| Figure 1: Extensive portion of the site that was cleared.....              | 32 |
| Figure 2: Removed fences must be reused or appropriately disposed of. .... | 32 |
| Figure 3: Access roads requiring regrading. ....                           | 33 |
| Figure 4: Bins must be provided for Waste management.....                  | 33 |
| Figure 6: Stockpile height exceeding 2m. ....                              | 34 |
| Figure 6: Water ponding onsite .....                                       | 34 |

## ABBREVIATIONS

|             |                                                         |
|-------------|---------------------------------------------------------|
| <b>BAR</b>  | Basic Assessment Report                                 |
| <b>CA</b>   | Competent Authority                                     |
| <b>DEA</b>  | Department of Environmental Affairs (now DFFE)          |
| <b>DFFE</b> | Department of Forestry, Fisheries, and the Environment  |
| <b>DWS</b>  | Department of Water and Sanitation                      |
| <b>EA</b>   | Environmental Authorisation                             |
| <b>EAP</b>  | Environmental Assessment Practitioner                   |
| <b>ECO</b>  | Environmental Control Officer                           |
| <b>EIA</b>  | Environmental Impact Assessment                         |
| <b>EMPr</b> | Environmental Management Programme                      |
| <b>EO</b>   | Environmental Officer (Contractor)                      |
| <b>ER</b>   | Employer's Representative                               |
| <b>ESCO</b> | Environmental Site Compliance Officer                   |
| <b>kV</b>   | Kilovolt                                                |
| <b>MVA</b>  | Megavolt Amperes                                        |
| <b>MW</b>   | Megawatt                                                |
| <b>NCC</b>  | NCC Environmental Services                              |
| <b>NCR</b>  | Non-Compliance Report                                   |
| <b>NEMA</b> | National Environmental Management Act (No. 107 of 1998) |
| <b>NWA</b>  | National Water Act (No. 36 of 1998)                     |
| <b>OHPL</b> | Overhead Power Line                                     |
| <b>SDC</b>  | Safe Disposal Certificate                               |
| <b>SHE</b>  | Safety, Health, and Environment                         |
| <b>SS</b>   | Substation                                              |
| <b>TBC</b>  | To Be Confirmed                                         |
| <b>WEF</b>  | Wind Energy Facility                                    |



## 2 INTRODUCTION

### 2.1 Background

NCC Operations (Pty) Ltd (**"NCC"**) was appointed by URSA Energy (Pty) LTD (**"URSA"**) to provide a suitably experienced independent Environmental Control Officer (**"ECO"**) for the construction phase of Virginia Solar Park which will be connected to the Eskom Theseus Main Transmission Substation (MTS). The site is located on Farm Blomskraal 216, Ventersburg RD located within the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province. On completion the facility will consist of the Photovoltaic (PV) Power Plant with a maximum generation capacity up to 100 MW, a 132kV powerline connecting the substation to the Eskom Theseus substation which is located 16.2 km North-East of the north-western corner of project site.

The ECO has the responsibility of ensuring the mitigation/ rehabilitation measures and conditions referred to in the Environmental Authorisation (**"EA"**) are implemented, as well as ensuring compliance with the requirements of the Environmental Management Programme (**"EMPr"**). This report provides an insight into the overall compliance performance and a summary of other environmental concerns and potential environmental risks through observations during site inspections.

This report is based on the following environmental conditions or requirements:

- a) Environmental Authorisations (EA)
  - 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
  - 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
  - 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)
  - 4) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
  - 5) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)
- b) Environmental Management Programmes (EMPr)
- c) Relevant environmental legislation.
- d) All other environmental permits, licenses, and authorisations.

The notification of commencement of construction was submitted to the DFFE for Virginia Solar Plant (Pty) Ltd on the 02 May 2024.

This report addresses conditions set out in the EA which states the ECO as part of their duties: *"The ECO must keep record of all activities on site, problems identified, transgressions noted, and a task schedule of tasks undertaken by the ECO."* As per the roles and responsibilities in the Virginia Solar Project (**"VSP"**) EMPr, the primary role of the ECO will

be to monitor the construction activities and ensure that the mitigation measures of the EMPr and Environmental Authorisations (EA) are implemented. This report also includes an audit checklist for the VSP EA as follows:

- 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
- 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
- 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)
- 4) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
- 5) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)

A summary of the various environmental requirements i.e. the audit criteria relating to the overall project is provided in **Table 1**.

**Table 1:** Summary of environmental requirements / criteria relating to the overall project.

| Components of overall project         | Environmental requirements / criteria |               |                             |          |
|---------------------------------------|---------------------------------------|---------------|-----------------------------|----------|
|                                       | DFFE EA Ref No.                       | Issue date    | Approved EMPr (Compiled by) | Date     |
| Virginia 1 Solar Park                 | 14/12/16/3/3/2/2099/1                 | 20 April 2022 | AGES Limpopo (Pty) Ltd      | Jan 2022 |
| Virginia 2 Solar Park                 | 14/12/16/3/3/2/2100                   | 20 May 2022   | AGES Limpopo (Pty) Ltd      | Jan 2022 |
| Virginia 3 Solar Park                 | 14/12/16/3/3/2/2101                   | 20 April 2022 | AGES Limpopo (Pty) Ltd      | Feb 2022 |
| Virginia Solar Park Switching Station | 14/12/16/3/3/2/2099/2                 | 20 April 2022 | AGES Limpopo (Pty) Ltd      | Jan 2022 |
| Virginia Solar Park OHPL              | 14/12/16/3/3/1/2444                   | 02 Feb 2022   | AGES Limpopo (Pty) Ltd      | Dec 2021 |

This report represents the monitoring for the Construction Phase. The responsibility of enforcement of the conditions of the EAs and EMPrs lies with the Project and Project Manager, while the Department of Forestry, Fisheries, and the Environment (“**DFFE**”) Environmental Management Inspectorate (“**EMI**”) may also enforce existing and potentially new conditions through compliance notices.

An Environmental Site Compliance Officer (“**ESCO**”) has been appointed by the holder of the EA to monitor the project compliance onsite on a full-time basis on behalf of the EA holder. The responsibilities of the ESCO includes:

- Monitoring conditions of the Basic Assessment Reports (“**BARs**”), Environmental Impact Report (**EIR**) EAs and the EMPrs.
- Ensuring compliance with all relevant environmental legislation.
- Approving method statements (reviewed by the ECO and co-approved by Site Manager).
- Remaining employed until the completion of the construction activities.

- Reporting to the Project Manager, including all findings identified onsite.
- Reporting any significant findings to the ECO.
- Preparing and submitting monthly reports to the ECO and Project Manager.
- Monitoring compliance by the Contractor.

In addition, the ESCO will:

- Undertake daily inspections of the site and surrounding areas.
- Audit compliance with the EMPr and conditions of the environmental authorisation.
- Take appropriate action if the specifications contained in the EMPr and conditions of the environmental authorisation are not followed.
- Monitor and verify that environmental impacts are kept to a minimum, as far as possible; and
- Ensure that activities onsite comply with all relevant environmental legislation.

## 2.2 Audit Scope and Purpose.

In accordance with Regulation 34 of the 2014 NEMA EIA Regulations (as amended) the holder of an environmental authorisation must, for the period during which the EA and EMPr, and where applicable the closure plan, remain valid —

- Ensure that the compliance with the conditions of the EA and the EMPr, and where applicable the closure plan, is audited; and*
- Submit an environmental audit report to the relevant competent authority.*

The purpose of this environmental audit is to verify compliance to the overarching environmental requirements specified as conditions of the EAs and EMPrs, and report on the extent to which the objectives of the EMPrs and are being achieved.

## 2.3 Monitoring Frequency and Reporting.

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 12<sup>th</sup> of February 2025 after which this report was compiled which serves to document and record the audit proceedings and observations and provide recommendations and conclusions in relation to the audit. This report covers the monthly reporting for the month of February 2025.

### 3 AUDITOR BACKGROUND.

NCC is a multi-disciplinary environmental consulting company based in South Africa which adopts a 'values driven' approach with a common purpose to conserve and create sustainable environments that enable people, planet and business to thrive. We are a trusted partner to major engineering and construction firms, mines, parastatals, film, sports and event production companies, municipalities, provincial and national government, and conservation organisations. Drawing on our years of experience on a wide range of projects, NCC works with our clients to develop, implement, and monitor customised services that add real value.

The auditor, Jennipher Sakaunda, is a senior environmental manager with more than 14 years' experience currently employed with NCC. Jennipher Sakaunda has experience in several environmental fields including environmental compliance monitoring and auditing, due diligence assessment, environmental impact and risk assessment, and compilation of environmental management plans/programmes.

**Table 2:** Details of the auditor.

|                       |                                                                                                                                                                                                |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Company</b>        | NCC Operations (Pty) Ltd                                                                                                                                                                       |
| <b>Auditor</b>        | Jennipher Sakaunda                                                                                                                                                                             |
| <b>Tel</b>            | +27 21 702 2884                                                                                                                                                                                |
| <b>Mobile</b>         | +27 69 510 7630                                                                                                                                                                                |
| <b>Email</b>          | <a href="mailto:jenniphers@ncc-group.co.za">jenniphers@ncc-group.co.za</a>                                                                                                                     |
| <b>Address</b>        | 26 Bell Close, Westlake Business Park Westlake, 7945                                                                                                                                           |
| <b>Affiliation</b>    | International Association of Impact Assessment South Africa.<br>Environmental Assessment Practitioner Association of South Africa.<br>South African Council of Natural Scientific Professions. |
| <b>Qualifications</b> | BSc (honors) Environmental Management                                                                                                                                                          |
| <b>Expertise</b>      | A detailed CV can be provided on request.                                                                                                                                                      |

## 4 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (February 2025) included the following:

- Access road
- Fencing of project boundary
- Clearing and grubbing PV areas
- Cut, fill and levelling works
- Site Establishment
- Clearing and grubbing Switching Station
- OHPL line monopole excavation

### 4.1 General Outstanding matters

Any major outstanding matters are to be recorded and summarised in the Concerns Register (**Annexure A**). The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

### 4.2 Audits (Internal and External)

Internal audits are undertaken monthly by the Red Rocket ESCO. This Audit was undertaken on the 12<sup>th</sup> of February 2025. Audit tables/checklists are available on request. The ECO undertakes external monthly audits.

## 5 WASTE MANAGEMENT

The contractor must make provision for waste avoidance, minimisation, and separation of waste where possible through recycling efforts. Waste management awareness must be done on an ongoing basis and must be provided through toolbox talks and awareness posters. Waste recycling must be done onsite.

### 5.1 Domestic/ General Waste

Approximately 5286 kg of general waste was generated on site in the month of February 2025. General waste bins are provided at the site camp. An estimated 4.8 tonnes of rubble were generated on site. This rubble came from the concrete tank that was demolished on site. The service providers dispose the general waste at Matjhabeng Local Municipality waste disposal site-Licence number: B33/2/340/21/P8 16/2/7/C404/D2/Z1/P367. Proof of disposal is available on request.

### 5.2 Hazardous waste

No hazardous waste was generated onsite in the month of February.

### 5.3 Wastewater

Approximately 19112 L of sewerage waste was generated on site in the month of February 2025. Chemical toilets are provided onsite. The Appointed Service Provider removes sewage and dispose of it at Matjhabeng Local Municipality wastewater treatment facility - Licence No: 10/D4/J/G/2082. Proof of disposal is available onsite. The contractor must ensure the appointed service provider is licenced to provide sewer removal services. Additionally, adequate ablution facilities must be always provided.

## 6 PROTECTIVE MEASURES

### 6.1 General

Protective measures have been deployed to mitigate environmental impacts or prevent impacts from occurring which includes:

- Security guards are present on the site, with access control in place.
- Induction training is conducted for all persons working and visiting the site.
- Snake gaiters are provided.
- Spill kits.
- No-go areas are demarcated and provided with signage.
- Access cards

## **7 ENVIRONMENTAL CONSERVATION**

### **7.1 Conservation of Flora and Fauna**

A permit to clear the site and relocate species of concern was received from the Free state Department of Economic, Small Business Development, Tourism and Environmental Affairs. The permit with Ref No. 202306000012649 was issued on 08/06/2023 to pluck protected and unprotected flora. Search and rescue of protected plants is ongoing. Rescued plants have been replanted on the farm where they will not be harmed by construction activities an where it was deemed suitable habitat for those species occurred. The locations of the rescued plants are known to the ESCO's and kept on file.

### **7.2 Water Management**

Approximately 1491 m<sup>3</sup> of water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The contactor must ensure water abstraction does not exceed the licenced volumes.

### **7.3 Soil Management**

As site establishment and works commence onsite, the contractor must ensure that no concrete is mixed directly onto the ground. Concrete must be mixed on trays or on a concrete slab to prevent soil pollution. Oil leakages from vehicles must be prevented by ensuring all standing vehicles are equipped with drip trays and leaking vehicles are removed from site for repair. No repairs of vehicles must be done onsite.

### **7.4 Stormwater and Erosion onsite**

Due to the extent of the vegetation that was cleared onsite, stormwater and erosion have become a problem.

The contractor must provide a Stormwater Management Plan for approval, that will be implemented to prevent erosion onsite.



## **8 INFRASTRUCTURE MANAGEMENT**

### **8.1 Access Roads**

The project team is using existing farm roads for current construction activities until such time as the project access roads and internal roads have been constructed. The existing access roads must be maintained.

### **8.2 Fences, Gates, and Barricading**

N/A.

### **8.3 Buildings and Structures**

N/A.

## 9 SOCIAL RESPONSIBILITY

Any complaints from the public are to be recorded on complaints register maintained by the Contractor whose responsibility it is to track and resolve the complaints/issues that are raised. In addition, a box for receiving internal grievances is present at the main site office facility which allows for project staff to bring to the attention of the project management team any comments and or concerns.

## 10 ENVIRONMENTAL AWARENESS AND TRAINING

The contractor has undertaken Toolbox talks for the month of **February 2025** covering the following topics:

- Non-negotiable golden rules
- Noise pollution
- How to use a Spill Kit.

## 11 HERITAGE

In an effort to rehabilitate the buffer area near the graves the contractor has barricaded the buffer and vegetation is establishing naturally. Monitoring is required to prevent the establishment of alien vegetation and erosion.

## 12 WARNING & NCRS

One non-conformance report ("**NCRs**") was issued by the ESCO during the month of February 2025. On the 20<sup>th</sup> of February 2025 an NRC was issued after the contractor failed to produce a Stormwater Management Plan after 3 months of being requested to submit.

## 13 REHABILITATION

No rehabilitation works have commenced during this period, further rehabilitation is expected to occur on the project as other works have been completed. The area that was cleared that falls within the 50 m buffer of the graves has been rehabilitated accordingly.

## 14 INCIDENTS AND ACCIDENTS

All environmental related events, incidents and accidents are to be reported directly to the ECO and kept on a central register and included in the monthly report. No environmental incidents were observed during this period. A template of the ECO incident register is attached as **Annexure C**.

## 15 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 12<sup>th</sup> of February 2025 with observations documented in this report. Monthly ECO compliance reports are submitted to the Department (DFFE) by the ECO.

## 16 AUDIT METHODOLOGY

This section provides an overview of the methods employed in making observations and providing recommendations and conclusions derived from the audit procedures undertaken.

### 16.1 Audit Process

The site visit, data reviews and report drafting were undertaken by the ECO/auditor. The audit included the following procedures:

- Site Inspections. The areas and aspects covered during the inspections with concurrent discussions with the ESCO and site-based representatives of the EA holder included *inter alia*:
  - i. Access control to the sites.
  - ii. Ecologically sensitive areas, where applicable.
  - iii. Waste management.
  - iv. Incident and complaints management.
  - v. Landowner relations.
  - vi. Infrastructure management.
  - vii. Environmental Awareness.
  - viii. Record-keeping and document control.
  - ix. Stormwater and Erosion management
- Documentation review. This included:
  - i. A review of the EAs, EMPs and where applicable, method statements.
  - ii. A review of previous audit reports, records, observations, and findings.
  - iii. A review of any remedial and/or protective measures implemented.
  - iv. Identification, if applicable, any gaps requiring action and/or rectification.
- Audit Report compilation. This included:
  - i. Recording any observations and findings identified during the audit.
  - ii. Providing recommendations relating to improvement or non-compliance, if and where applicable.

### 16.2 Observation and Recommendation Determination

Observations and subsequent recommendations were based on and are limited to the following:

- i. Available documentation and records viewed or received prior, subsequent, or during the site visit;
- ii. Observations made during the period that the ECO/auditor was on site; and
- iii. Information received from both direct and cross-referenced discussions with permanent site-based staff.

### 16.3 Findings

Any key findings highlighted in this report will indicate areas and/or aspects that require improvement or rectification. The purpose of summarising the findings is to allow the EA holder to identify common management challenges that effect the level of compliance to the conditions of the EAs and EMPs.

Where findings and recommendations pertaining are deemed significant through compliance status or performance, they are documented as specific issues in the report. All site-specific observations are recorded in the corresponding audit checklist tables **(these are available upon request)**.

### 16.4 Audit Tables and Compliance Ratings

The audit table captures observations and recommendations made in relation to the conditions stipulated in the EAs and EMPs. It provides the reader with more detailed information in terms of what the stipulated requirements are in relation to the organisation's assessed current compliance status, according to the observations recorded by the auditor.

Ratings are calculated based on a scoring system whereby each auditable condition is provided with a score as highlighted in **Table 3** below.

**Table 4:** Compliance rating and scoring.

| Status                       | Compliance Rating |        | Scoring | Description                                                                                                                                                                         |
|------------------------------|-------------------|--------|---------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              | Abbreviation      | Symbol |         |                                                                                                                                                                                     |
| Compliant                    | C                 | ✓✓✓    | 3       | No improvements required                                                                                                                                                            |
| Partially Compliant          | PC                | ✓✓     | 2       | Minor improvements required                                                                                                                                                         |
| Minor-non-Compliant          | MC                | ✓      | 1       | Significant improvements required.                                                                                                                                                  |
| Major-Compliant              | NC                | x      | 0       | Major improvements required                                                                                                                                                         |
| Not Applicable / Not Audited | NA                | -      | -       | No improvements required and / or the condition is either not, not yet or no longer relevant at the time of the audit                                                               |
| Informative                  | info              | -      | -       | These relate to informative elements that provide either useful information or are descriptive in the explanation and understanding of statements or concepts in the audit criteria |

Each condition has been ascribed a colour-coded status indicator of Compliant (green), Partially Compliant (yellow), major-compliant (red), minor noncompliance (orange) Not Auditable/Audited (grey) and Informative (blank/white) to assist the reader in determining aspects that require attention to improve on compliance achieved, if and where

applicable. No compliance scoring is attributed any of the audit criteria information pertaining to the latter two audit status symbols, namely 'NA' and 'info' as they were either not auditable and/or were not applicable/relevant at the time the audit was undertaken. In other words, they are excluded from the overall compliance rating calculations.

An overall compliance rating is calculated as a percentage to provide the reader with an overview of compliance to the relevant audit criteria however each condition should be considered on its own merits as the ratings do not necessarily portray the severity or impact of the reported finding relating to a condition.

## 17 ASSUMPTIONS AND LIMITATIONS

The ECO compliance audit and associated report are based upon the assumptions that:

- i. Documentation provided to the ECO/auditor is factual and true.
- ii. The audit is based purely on the conditions as stipulated in the EAs and EMPs.
- iii. The construction phase is currently underway and operational phase activities are not applicable.
- iv. Documentation / reports were randomly sampled / reviewed in order to accommodate time constraints.
- v. Where visual observations were not possible either due to physical access constraints or safety constraints, the ECO/auditor used other means to determine compliance, either through requesting written evidence provided by contractors / service providers who service the site or via interviews with technical site-based staff.

## 18 CONSULTATION PROCESS

The approach of consultation followed during the environmental audit was based on written (email) and telephonic correspondence between the ECO/auditor and the Environmental Site Compliance Officer which also includes consultation and communication with the EA holder and competent authority in terms of report submission.

## 19 FINDINGS

Findings are listed in the attached checklists, and it should be noted that findings should be considered individually in the context of the full audit and each condition and associated rating. At this early stage during the construction phase of the VSP and associated infrastructure most of the aspects are not applicable including closure and rehabilitation. The following non compliances were noted onsite:

- Dust
- Stockpile exceeding 2m in height.
- Due to the extent of vegetation cleared onsite erosion was noted.
- Waste is not being recycled.
- Water ponding on the access roads
- Used drip trays were being left in the rain causing oil to flow on to the ground.
- Large concrete blocks must be removed.

Based on the outcomes of the audit it was established that the objectives of the EAs and EMPs were achieved in terms of:

- Sufficiently providing for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis;*
- Ensuring compliance with the provisions of environmental authorisation and EMPs.*

### 19.1 Minor improvements required.

- Waste recycling must be done onsite.

### 19.2 Major improvements required.

- Regrading of access roads
- Dust suppression.
- Removal of concrete block from site.

## 20 AUDIT SUMMARY

In terms of the findings and results of the **February 2025** ECO audit, the project achieved an overall **97.5%** compliance rating with the conditions of the EAs and EMPs.

Table 4: Compliance Scoring

| Virginia, Solar Park 1,2,3, Virginia Solar Park and Virginia OHPL, Free State Province |                                                                                                            |               |                          |                    |                          |                                   |                  |         |
|----------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------|--------------------------|--------------------|--------------------------|-----------------------------------|------------------|---------|
| No                                                                                     | Audit criteria                                                                                             | Compliant (C) | Partially Compliant (PC) | Minor Noncompliant | Major-non-Compliant (NC) | Not Applicable / Not Audited (NA) | Normative (info) |         |
| 1                                                                                      | Environmental Authorisation for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)                 | 50            | 1                        | 0                  | 0                        | 0                                 | 0                | (98,9%) |
| 2                                                                                      | Environmental Authorisation for Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)                   | 50            | 1                        | 0                  | 0                        | 0                                 | 0                | (98,9%) |
| 3                                                                                      | Environmental Authorisation for Virginia 3 Solar Park (DFFE REF NO: 14/12/16/3/3/2/2101)                   | 52            | 1                        | 0                  | 0                        | 0                                 | 0                | (99%)   |
| 4                                                                                      | Environmental Authorisation for Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2) | 47            | 0                        | 0                  | 0                        | 0                                 | 0                | (100%)  |
| 5                                                                                      | Environmental Authorisation for Virginia Solar Park OHPL (DFFE REF NO: 14/12/16/3/3/1/2444)                | 36            | 0                        | 0                  | 0                        | 0                                 | 0                | (100%)  |
| 6                                                                                      | EMPr for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)                                        | 329           | 21                       | 3                  | 2                        | 10                                | 0                | (95,6%) |
| 7                                                                                      | EMPr Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)                                              | 331           | 21                       | 4                  | 2                        | 12                                | 0                | (95,7%) |
| 8                                                                                      | EMPr Virginia 3 Solar Park (DFFE REF NO: 14/12/16/3/3/2/2101)                                              | 78            | 4                        | 3                  | 1                        | 2                                 | 0                | (95,2%) |



|                                                  |                                                                                        |                              |    |    |   |    |   |                                          |
|--------------------------------------------------|----------------------------------------------------------------------------------------|------------------------------|----|----|---|----|---|------------------------------------------|
| 9                                                | <b>EMPr Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2)</b> | 265                          | 0  | 0  | 0 | 0  | 0 | (100%)                                   |
| 10                                               | <b>EMPr Virginia Solar Park OHPL (DFFE REF NO: 14/12/16/3/3/1/2444)</b>                | 82                           | 0  | 0  | 0 | 0  | 0 | (100%)                                   |
| <b>Overall total no. conditions</b>              |                                                                                        | 1320                         | 49 | 10 | 5 | 24 | 0 | <b>4224</b>                              |
| <b>Audited conditions</b>                        |                                                                                        | 3960                         | 98 | 10 | 0 | -  | - | <b>4068</b> (Pot<br>ential max<br>score) |
| <b>Scoring symbol</b>                            |                                                                                        | ✓✓<br>✓                      | ✓✓ | ✓  | ✗ | -  | - |                                          |
| <b>Overall Compliance Rating Calculation (%)</b> |                                                                                        | {[(3963+36+13)] / 4113} x100 |    |    |   |    |   | <b>96.5%</b>                             |

## 21 RECOMMENDATIONS

**Based on the noncompliance identified following is recommended:**

- Clearance of vegetation must be phased to reduce the quantity of excessive dust generated.
- Chemical dust suppressants must be used on site. Due the extend of exposed sites using water to suppress dust will be costly.
- All standing trucks must be equipped with drip trays and spoiled materials must be scooped and stored in plastic bags before being disposed at a registered landfill site.
- Stormwater management plan must be submitted for approval and implementation.
- Access roads must be maintained.
- Drip trays must be cleaned timeously.
- Channels must be opened on the roads to drain ponding water.

## 22 CONCLUSION

The contractor must ensure that systems and resources to monitor and manage environmental risks and impacts adequately are in place. Resources and personnel to train employees on the contents of the EMPs must be made to ensure that the project runs effectively and efficiently with minimal impact to the biophysical and socio-economic environment.

In general, the EMPs are effective in their current format in terms of content and relevance and there are no major shortcomings. The EMP's sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with this project.

**PREPARED BY:**

A handwritten signature in black ink, appearing to read 'Sakaunda', is positioned above the printed name.

**Sakaunda Jennipher**

Environmental Control Officer

NCC Operations (Pty) Ltd

**M** ·069 510 7630

**E** · [jenniphers@ncc-group.co.za](mailto:jenniphers@ncc-group.co.za)

**REVIEWED BY:**

**Trevor O'Donoghue**

Senior Environmental Consultant

NCC Operations (Pty) Ltd

**M** ·084 465 4058

**E** ·[trevorod@ncc-group.co.za](mailto:trevorod@ncc-group.co.za)

## ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

### Open Concerns/Complaint

| No | Observation date | Concern/Complaint | Suggested Due Date <sup>1</sup> | Proposed Corrective Action | Status | Closure status |
|----|------------------|-------------------|---------------------------------|----------------------------|--------|----------------|
|    |                  |                   |                                 |                            |        |                |

*\*The concerns register is updated once the ECO is present on site.*

### Closed Concerns

| No | Observation date | Concern/Complaint | Due Date suggested by ECO | Corrective Action Taken | Outcome | Closure status |
|----|------------------|-------------------|---------------------------|-------------------------|---------|----------------|
|    |                  |                   |                           |                         |         |                |
|    |                  |                   |                           |                         |         |                |

## ANNEXURE B - NCR REGISTER

| Date       | Type                                                                                            | Impact                                                                              | Description of Incident                                                                                                    | Volume | Remedial Action                                                     |                                               |
|------------|-------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|--------|---------------------------------------------------------------------|-----------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water pollution/ Soil<br>pollution/ Air<br>pollution/ Erosion/<br>Biodiversity etc. | What, Where, When,<br>How, why did it<br>happen?                                                                           |        | Immediate<br>Corrective<br>Actions                                  | Preventative<br>measures                      |
| 20/02/2025 | Storm water<br>management Plan                                                                  | Storm Water and Erosion                                                             | The contract has failed to submit a Storm Water Management Plan despite being requested to do so in the past three months. | N/A    | The Stormwater Management Plan Must be submitted and implemented. . | Required documents must be submitted on time. |

## ANNEXURE C - INCIDENT REGISTER

| Date | Type                                                                                            | Impact                                                                                          | Description of Incident                          | Volume | Remedial Action                    |                          |
|------|-------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|--------------------------------------------------|--------|------------------------------------|--------------------------|
|      | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/<br>Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When,<br>How, Why did it<br>happen? |        | Immediate<br>Corrective<br>Actions | Preventative<br>measures |
|      |                                                                                                 |                                                                                                 |                                                  |        |                                    |                          |

## **ANNEXURE D – PHOTOGRAPHS**



**Figure 1:** Extensive portion of the site that was cleared.



**Figure 2:** Removed fences must be reused or appropriately disposed of.





**Figure 3:** Access roads requiring regrading.



**Figure 4:** Bins must be provided for Waste management



**Figure 5:** Stockpile height exceeding 2m.



**Figure 6:** Water ponding onsite

**THIS PAGE WAS INTENTIONALLY LEFT BLANK**

**MARCH 2025**



---

# ECO MONTHLY ENVIRONMENTAL MONITORING REPORT

Virginia Photo Voltaic (PV) Solar Facility 1, 2 and 3,  
Matjhabeng, Lejweleputswa District Municipality within  
the jurisdiction of the Free State Province.

March 2025

---

**PREPARED FOR:**

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

Department of Forestry, Fisheries, and the Environment: Compliance Monitoring

**DATED:**

March 2025

**PREPARED BY:**

NCC Operations

**T** • 021 702 2884

**E** • [info@ncc-group.co.za](mailto:info@ncc-group.co.za)

## DECLARATION OF INDEPENDENCE

I, Jennipher Sakaunda, as duly authorised representative of NCC Operations (Pty) Ltd ("**NCC**"), hereby confirm my independence (as well as that of NCC) as an auditor and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which URSA Energy (Pty) Ltd has appointed NCC as Environmental Control Officer ("**ECO**"), other than fair remuneration for worked performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'J Sakaunda', is positioned below the 'Signed:' text.

**Jennipher Sakaunda**

03 April 2025

Environmental Control Officer

NCC Operations (Pty) Ltd

## **LIABILITY DISCLAIMER AND CONFIDENTIALITY CLAUSE**

All inspections conducted, as well as reports and recommendations provided by NCC are purely advisory. They are primarily intended for the purpose of assisting clients in loss control, risk management as well as health, safety, and environmental procedures.

Observations and recommendations are the result of practices and conditions observed, and information made available to us in various forms at the time of our visit. They do not purport to refer to or guarantee compliance with local or government regulations which may be applicable to such practices and conditions. This report should not be considered a definitive listing of all existing risks nor an absolute solution to all indicated risks, or hazards present from time to time in the Client Organisation. The report should always be considered in its entirety; individual sentences, paragraphs or sections of the report should not be used in isolation.

This report should not be reproduced except in its entirety, including this liability disclaimer or contents reproduced or disclosed to any third party without the prior written approval of NCC.

NCC assumes no responsibility for any losses incurred as a result of the implementation, management, and operation of recommended health, safety and environmental systems, processes and procedures.



## DOCUMENT CONTROL

|                     |                                                         |
|---------------------|---------------------------------------------------------|
| <b>REPORT TITLE</b> | Monthly ECO Environmental Monitoring Report             |
| <b>PROJECT</b>      | Virginia Solar PV 1, 2, 3 and Associated Infrastructure |
| <b>LOCATION</b>     | Free State Province                                     |
| <b>EA HOLDER</b>    | URSA Energy (Pty) Ltd                                   |
| <b>ECO</b>          | NCC Operations (Pty) Ltd                                |
| <b>REVISION</b>     | 00                                                      |
| <b>DATE</b>         | 03/04/2025                                              |

| Revision | Date       | Description                  |
|----------|------------|------------------------------|
| Rev 00   | 03/04/2025 | First Draft - Internal       |
| Rev 01   | TBC        | Final - Authority submission |

## REPORT DISTRIBUTION LIST

| Name                   | Organisation                      | Issued     | Format     |
|------------------------|-----------------------------------|------------|------------|
| Janine Brasington      | Red Rocket South Africa (Pty) Ltd | 03/04/2025 | Electronic |
| Serina Pillay          | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Maggie Logan           | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Director of Compliance | DFFE                              | TBC        | Electronic |



## TABLE OF CONTENTS

### 1 CONTENTS

|                                                     |           |
|-----------------------------------------------------|-----------|
| <b>ABBREVIATIONS.....</b>                           | <b>8</b>  |
| <b>2 INTRODUCTION .....</b>                         | <b>9</b>  |
| 2.1 Background.....                                 | 9         |
| 2.2 Audit Scope and Purpose.....                    | 11        |
| 2.3 Monitoring Frequency and Reporting .....        | 11        |
| <b>3 AUDITOR BACKGROUND. ....</b>                   | <b>12</b> |
| <b>4 GENERAL (NOTABLE EVENTS) .....</b>             | <b>13</b> |
| 4.1 General Outstanding matters .....               | 13        |
| 4.2 Audits (Internal and External) .....            | 13        |
| <b>5 WASTE MANAGEMENT .....</b>                     | <b>14</b> |
| 5.1 Domestic/ General Waste .....                   | 14        |
| 5.2 Hazardous waste.....                            | 14        |
| 5.3 Wastewater .....                                | 14        |
| <b>6 PROTECTIVE MEASURES.....</b>                   | <b>15</b> |
| 6.1 General .....                                   | 15        |
| <b>7 ENVIRONMENTAL CONSERVATION.....</b>            | <b>16</b> |
| 7.1 Conservation of Flora and Fauna .....           | 16        |
| 7.2 Water Management .....                          | 16        |
| 7.3 Soil Management .....                           | 16        |
| 7.4 Stormwater and Erosion onsite.....              | 16        |
| <b>8 INFRASTRUCTURE MANAGEMENT.....</b>             | <b>17</b> |
| 8.1 Access Roads.....                               | 17        |
| 8.2 Fences, Gates, and Barricading .....            | 17        |
| 8.3 Buildings and Structures.....                   | 17        |
| <b>9 SOCIAL RESPONSIBILITY .....</b>                | <b>18</b> |
| <b>10 ENVIRONMENTAL AWARENESS AND TRAINING.....</b> | <b>18</b> |
| <b>11 HERITAGE .....</b>                            | <b>18</b> |
| <b>12 WARNING &amp; NCRS .....</b>                  | <b>18</b> |

|           |                                                        |           |
|-----------|--------------------------------------------------------|-----------|
| <b>13</b> | <b>REHABILITATION .....</b>                            | <b>19</b> |
| <b>14</b> | <b>INCIDENTS AND ACCIDENTS .....</b>                   | <b>20</b> |
| <b>15</b> | <b>MEETINGS AND OTHER CORRESPONDANCE.....</b>          | <b>20</b> |
| <b>16</b> | <b>AUDIT METHODOLOGY .....</b>                         | <b>21</b> |
| 16.1      | Audit Process .....                                    | 21        |
| 16.2      | Observation and Recommendation Determination .....     | 21        |
| 16.3      | Findings.....                                          | 22        |
| 16.4      | Audit Tables and Compliance Ratings .....              | 22        |
| <b>17</b> | <b>ASSUMPTIONS AND LIMITATIONS.....</b>                | <b>23</b> |
| <b>18</b> | <b>CONSULTATION PROCESS.....</b>                       | <b>23</b> |
| <b>19</b> | <b>FINDINGS.....</b>                                   | <b>24</b> |
| 19.1      | Minor improvements required.....                       | 24        |
| 19.2      | Major improvements required.....                       | 24        |
| <b>20</b> | <b>AUDIT SUMMARY .....</b>                             | <b>25</b> |
| <b>21</b> | <b>RECOMMENDATIONS.....</b>                            | <b>27</b> |
| <b>22</b> | <b>CONCLUSION .....</b>                                | <b>27</b> |
|           | <b>ANNEXURE A – CONCERNS/COMPLAINTS REGISTER .....</b> | <b>29</b> |
|           | <b>ANNEXURE B - NCR REGISTER.....</b>                  | <b>30</b> |
|           | <b>ANNEXURE C - INCIDENT REGISTER.....</b>             | <b>31</b> |
|           | <b>THIS PAGE WAS INTENTIONALLY LEFT BLANK .....</b>    | <b>40</b> |

## TABLE OF FIGURES

|                                                                         |    |
|-------------------------------------------------------------------------|----|
| Figure 1: Alien Vegetation that must be cleared .                       | 34 |
| Figure 2: Removed fences must be reused or appropriately disposed of.   | 34 |
| Figure 3: Drip Trays being used onsite.                                 | 35 |
| Figure 4: Roads requiring regrading                                     | 35 |
| Figure 5: Erosion onsite                                                | 36 |
| Figure 6: Water ponding onsite                                          | 36 |
| Figure 7: Spillage from the toilet                                      | 37 |
| Figure 8: Spillages that were not removed.                              | 37 |
| Figure 9: Drip tray with water                                          | 38 |
| Figure 10: A Shade must be provided for people working on the powerline | 38 |
| Figure 11: No-go signs that were placed                                 | 39 |

## ABBREVIATIONS

|             |                                                         |
|-------------|---------------------------------------------------------|
| <b>BAR</b>  | Basic Assessment Report                                 |
| <b>CA</b>   | Competent Authority                                     |
| <b>DEA</b>  | Department of Environmental Affairs (now DFFE)          |
| <b>DFFE</b> | Department of Forestry, Fisheries, and the Environment  |
| <b>DWS</b>  | Department of Water and Sanitation                      |
| <b>EA</b>   | Environmental Authorisation                             |
| <b>EAP</b>  | Environmental Assessment Practitioner                   |
| <b>ECO</b>  | Environmental Control Officer                           |
| <b>EIA</b>  | Environmental Impact Assessment                         |
| <b>EMPr</b> | Environmental Management Programme                      |
| <b>EO</b>   | Environmental Officer (Contractor)                      |
| <b>ER</b>   | Employer's Representative                               |
| <b>ESCO</b> | Environmental Site Compliance Officer                   |
| <b>kV</b>   | Kilovolt                                                |
| <b>MVA</b>  | Megavolt Amperes                                        |
| <b>MW</b>   | Megawatt                                                |
| <b>NCC</b>  | NCC Operations                                          |
| <b>NCR</b>  | Non-Compliance Report                                   |
| <b>NEMA</b> | National Environmental Management Act (No. 107 of 1998) |
| <b>NWA</b>  | National Water Act (No. 36 of 1998)                     |
| <b>OHPL</b> | Overhead Power Line                                     |
| <b>SDC</b>  | Safe Disposal Certificate                               |
| <b>SHE</b>  | Safety, Health, and Environment                         |
| <b>SS</b>   | Substation                                              |
| <b>TBC</b>  | To Be Confirmed                                         |

## 2 INTRODUCTION

### 2.1 Background

NCC Operations (Pty) Ltd ("**NCC**") was appointed by URSA Energy (Pty) LTD ("**URSA**") to provide a suitably experienced independent Environmental Control Officer ("**ECO**") for the construction phase of Virginia Solar Park which will be connected to the Eskom Theseus Main Transmission Substation (MTS). The site is located on Farm Blomskraal 216, Ventersburg RD located within the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province. On completion the facility will consist of the Photovoltaic (PV) Power Plant with a maximum generation capacity up to 100 MW, a 132kV powerline connecting the substation to the Eskom Theseus substation which is located 16.2 km North-East of the north-western corner of project site.

The ECO has the responsibility of ensuring the mitigation/ rehabilitation measures and conditions referred to in the Environmental Authorisation ("**EA**") are implemented, as well as ensuring compliance with the requirements of the Environmental Management Programme ("**EMPr**"). This report provides an insight into the overall compliance performance and a summary of other environmental concerns and potential environmental risks through observations during site inspections.

This report is based on the following environmental conditions or requirements:

- a) Environmental Authorisations (EA)
  - 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
  - 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
  - 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)
  - 4) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
  - 5) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)
- b) Environmental Management Programmes (EMPr)
- c) Relevant environmental legislation.
- d) All other environmental permits, licenses, and authorisations.

The notification of commencement of construction was submitted to the DFFE for Virginia Solar Plant (Pty) Ltd on the 02 May 2024.

This report addresses conditions set out in the EA which states the ECO as part of their duties: *"The ECO must keep record of all activities on site, problems identified, transgressions noted, and a task schedule of tasks undertaken by the ECO."* As per the roles and responsibilities in the Virginia Solar Project ("**VSP**") EMPr, the primary role of the ECO will

be to monitor the construction activities and ensure that the mitigation measures of the EMPr and Environmental Authorisations (EA) are implemented. This report also includes an audit checklist for the VSP EA as follows:

- 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
- 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
- 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)
- 4) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
- 5) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)

A summary of the various environmental requirements i.e. the audit criteria relating to the overall project is provided in **Table 1**.

**Table 1:** Summary of environmental requirements / criteria relating to the overall project.

| Components of overall project         | Environmental requirements / criteria |               |                             |          |
|---------------------------------------|---------------------------------------|---------------|-----------------------------|----------|
|                                       | DFFE EA Ref No.                       | Issue date    | Approved EMPr (Compiled by) | Date     |
| Virginia 1 Solar Park                 | 14/12/16/3/3/2/2099/1                 | 20 April 2022 | AGES Limpopo (Pty) Ltd      | Jan 2022 |
| Virginia 2 Solar Park                 | 14/12/16/3/3/2/2100                   | 20 May 2022   | AGES Limpopo (Pty) Ltd      | Jan 2022 |
| Virginia 3 Solar Park                 | 14/12/16/3/3/2/2101                   | 20 April 2022 | AGES Limpopo (Pty) Ltd      | Feb 2022 |
| Virginia Solar Park Switching Station | 14/12/16/3/3/2/2099/2                 | 20 April 2022 | AGES Limpopo (Pty) Ltd      | Jan 2022 |
| Virginia Solar Park OHPL              | 14/12/16/3/3/1/2444                   | 02 Feb 2022   | AGES Limpopo (Pty) Ltd      | Dec 2021 |

This report represents the monitoring for the Construction Phase. The responsibility of enforcement of the conditions of the EAs and EMPrs lies with the Project and Project Manager, while the Department of Forestry, Fisheries, and the Environment (“**DFFE**”) Environmental Management Inspectorate (“**EMI**”) may also enforce existing and potentially new conditions through compliance notices.

An Environmental Site Compliance Officer (“**ESCO**”) has been appointed by the holder of the EA to monitor the project compliance onsite on a full-time basis on behalf of the EA holder. The responsibilities of the ESCO includes:

- Monitoring conditions of the Basic Assessment Reports (“**BARs**”), Environmental Impact Report (**EIR**) EAs and the EMPrs.
- Ensuring compliance with all relevant environmental legislation.
- Approving method statements (reviewed by the ECO and co-approved by Site Manager).
- Remaining employed until the completion of the construction activities.

- Reporting to the Project Manager, including all findings identified onsite.
- Reporting any significant findings to the ECO.
- Preparing and submitting monthly reports to the ECO and Project Manager.
- Monitoring compliance by the Contractor.

In addition, the ESCO will:

- Undertake daily inspections of the site and surrounding areas.
- Audit compliance with the EMPr and conditions of the environmental authorisation.
- Take appropriate action if the specifications contained in the EMPr and conditions of the environmental authorisation are not followed.
- Monitor and verify that environmental impacts are kept to a minimum, as far as possible; and
- Ensure that activities onsite comply with all relevant environmental legislation.

## **2.2 Audit Scope and Purpose.**

In accordance with Regulation 34 of the 2014 NEMA EIA Regulations (as amended) the holder of an environmental authorisation must, for the period during which the EA and EMPr, and where applicable the closure plan, remain valid —

- a) Ensure that the compliance with the conditions of the EA and the EMPr, and where applicable the closure plan, is audited; and*
- b) Submit an environmental audit report to the relevant competent authority.*

The purpose of this environmental audit is to verify compliance to the overarching environmental requirements specified as conditions of the EAs and EMPrs, and report on the extent to which the objectives of the EMPrs and are being achieved.

## **2.3 Monitoring Frequency and Reporting.**

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 20<sup>th</sup> of March 2025 after which this report was compiled which serves to document and record the audit proceedings and observations and provide recommendations and conclusions in relation to the audit. This report covers the monthly reporting for the month of March 2025.

### 3 AUDITOR BACKGROUND.

NCC is a multi-disciplinary environmental consulting company based in South Africa which adopts a 'values driven' approach with a common purpose to conserve and create sustainable environments that enable people, planet and business to thrive. We are a trusted partner to major engineering and construction firms, mines, parastatals, film, sports and event production companies, municipalities, provincial and national government, and conservation organisations. Drawing on our years of experience on a wide range of projects, NCC works with our clients to develop, implement, and monitor customised services that add real value.

The auditor, Jennipher Sakaunda, is a senior environmental manager with more than 14 years' experience currently employed with NCC. Jennipher Sakaunda has experience in several environmental fields including environmental compliance monitoring and auditing, due diligence assessment, environmental impact and risk assessment, and compilation of environmental management plans/programmes.

**Table 2:** Details of the auditor.

|                       |                                                                                                                                                                                                |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Company</b>        | NCC Operations (Pty) Ltd                                                                                                                                                                       |
| <b>Auditor</b>        | Jennipher Sakaunda                                                                                                                                                                             |
| <b>Tel</b>            | +27 21 702 2884                                                                                                                                                                                |
| <b>Mobile</b>         | +27 69 510 7630                                                                                                                                                                                |
| <b>Email</b>          | <a href="mailto:jenniphers@ncc-group.co.za">jenniphers@ncc-group.co.za</a>                                                                                                                     |
| <b>Address</b>        | 26 Bell Close, Westlake Business Park Westlake, 7945                                                                                                                                           |
| <b>Affiliation</b>    | International Association of Impact Assessment South Africa.<br>Environmental Assessment Practitioner Association of South Africa.<br>South African Council of Natural Scientific Professions. |
| <b>Qualifications</b> | BSc (honors) Environmental Management                                                                                                                                                          |
| <b>Expertise</b>      | A detailed CV can be provided on request.                                                                                                                                                      |



## 4 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (March 2025) included the following:

- Construction of the access road
- Fencing of project boundary
- Clearing and grubbing PV areas
- Cut, fill and levelling works
- Site Establishment
- Clearing and grubbing Switching Station
- OHPL line monopole excavation

### 4.1 General Outstanding matters

Any major outstanding matters are to be recorded and summarised in the Concerns Register (**Annexure A**). The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

### 4.2 Audits (Internal and External)

Internal audits are undertaken monthly by the Red Rocket ESCO. This ECO Audit was undertaken on the 20<sup>th</sup> of March 2025. Audit tables/checklists are attached to this report. The ECO undertakes external monthly audits.

## 5 WASTE MANAGEMENT

The contractor must make provision for waste avoidance, minimisation, and separation of waste where possible through recycling efforts. Waste management awareness must be done on an ongoing basis and must be provided through toolbox talks and awareness posters. Waste recycling must be done onsite.

### 5.1 Domestic/ General Waste

Approximately 4978kg of general waste including wood were removed from site in the month of March 2025. General waste bins are provided at the site camp. This rubble came from the concrete tank that was demolished on site. The service providers dispose the general waste at Matjhabeng Local Municipality waste disposal site-Licence number: B33/2/340/21/P8 16/2/7/C404/D2/Z1/P367. Proof of disposal is available on request.

### 5.2 Hazardous waste

Hazardous waste that was generated from the diesel spill onsite, since the waste has not been disposed the quantity is not available. This information will be provided in the next reporting cycle.

### 5.3 Wastewater

Approximately 36582.22L of sewerage waste was generated on site in the month of March 2025. Chemical toilets and a conservancy tank have been provided onsite. The conservancy tank onsite was displaced due to heavy rains and poor storm water management which resulted in a spillage. The General Authorisation that was issued by DWS for the includes the use of a conservancy tank up to a capacity of 50 000l. The contractor must ensure that this capacity is not exceeded.

The Appointed Service Provider removes sewage and dispose of it at Matjhabeng Local Municipality wastewater treatment facility - Licence No: 10/D4/J/G/2082. Proof of disposal is available onsite. The contractor must ensure the appointed service provider is licenced to provide sewer removal services. Additionally, adequate ablution facilities must be always provided.

## 6 PROTECTIVE MEASURES

### 6.1 General

Protective measures have been deployed to mitigate environmental impacts or prevent impacts from occurring which includes:

- Security guards are present on the site, with access control in place.
- Induction training is conducted for all persons working and visiting the site.
- Snake gaiters are provided.
- Spill kits.
- No-go areas are demarcated and provided with signage.
- Access cards

## **7 ENVIRONMENTAL CONSERVATION**

### **7.1 Conservation of Flora and Fauna**

A permit to clear the site and relocate species of concern was received from the Free state Department of Economic, Small Business Development, Tourism and Environmental Affairs. The permit with Ref No. 202306000012649 was issued on 08/06/2023 to pluck protected and unprotected flora. During the audit shoots from bulbs were observed on the areas that were cleared, search and rescue must be repeated before construction commences. Alien Vegetation has established on site on the cleared areas. The Contractor must submit an Alien Plant Management Programme for approval and implementation.

### **7.2 Water Management**

Approximately 1640 m<sup>3</sup> of water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The contractor must ensure water abstraction does not exceed the licenced volumes.

### **7.3 Soil Management**

As site establishment and works commence onsite, the contractor must ensure that no concrete is mixed directly onto the ground. Concrete must be mixed on trays or on a concrete slab to prevent soil pollution. Any concrete that falls on the ground during pouring must be cleaned immediately. Oil leakages from vehicles must be prevented by ensuring all standing vehicles are equipped with drip trays and leaking vehicles are removed from site for repair. No repairs of vehicles must be done onsite.

### **7.4 Stormwater and Erosion onsite**

Due to the extent of the vegetation that was cleared onsite, stormwater and erosion have become a problem.

The contractor must provide a Stormwater Management Plan for approval, that will be implemented to manage erosion onsite. The contractor must submit an Alien Vegetation Management Plan for approval to manage alien vegetation onsite.

## **8 INFRASTRUCTURE MANAGEMENT**

### **8.1 Access Roads**

The project team is using existing farm roads for current construction activities until such time as the project access roads and internal roads have been constructed. The existing access roads must be maintained.

### **8.2 Fences, Gates, and Barricading**

The site is fenced with security personnel manning the gates. Access cards are used to allow entrance to site . Open trenches are barricaded by the contractor, this must be maintained to prevent injuries.

### **8.3 Buildings and Structures**

Containers have been established on site by various subcontractors that are being used as offices. Male and female ablation facilities have been provided. Chemical toilets and a conservancy tank are used to manage sewer onsite. Due to heavy rains and poor stormwater management the conservancy tank was displaced which resulted in a spillage.

## 9 SOCIAL RESPONSIBILITY

Any complaints from the public are to be recorded on complaints register maintained by the Contractor whose responsibility it is to track and resolve the complaints/issues that are raised. In addition, a box for receiving internal grievances is present at the main site office facility which allows for project staff to bring to the attention of the project management team any comments and or concerns.

## 10 ENVIRONMENTAL AWARENESS AND TRAINING

The contractor has undertaken Toolbox talks for the month of March 2025 covering the following topics:

- Water Conservation
- Hazardous Waste
- Environmental Incident
- Waste Management
- Muddy Conditions
- Snake awareness
- Bees
- Oil Spillages
- Topsoil Management
- Preventing Water Pollution
- Hydrocarbon Spillages
- Drinking Water
- Spill Management & Response

## 11 HERITAGE

In the event of any unknown artefacts being uncovered during construction, the ESCO and Project Manager must be informed immediately who must then instruct work to be stopped in the immediate area and then promptly report the discovery/finding to the ECO, a heritage specialist and the relevant heritage authority to investigate and confirm if such discovery is in fact a heritage artefact of any significance. No activities impacting upon any heritage sites were reported during this reporting period.

## 12 WARNING & NCRS

No NCR reports were issued by the ECO in the month of March.

## 13 REHABILITATION

No rehabilitation works have commenced during this period, further rehabilitation is expected to occur on the project as and when other works have been completed.

## **14 INCIDENTS AND ACCIDENTS**

All environmental related events, incidents and accidents are to be reported directly to the ECO and kept on a central register and included in the monthly report. All the environmental incidents that were observed during the March period are recorded in Annexure C.

## **15 MEETINGS AND OTHER CORRESPONDANCE**

The ECO conducted the monthly site visit on the 20<sup>th</sup> of March 2025 with observations documented in this report. Monthly ECO compliance reports are submitted to the Department (DFFE) by the ECO.



## 16 AUDIT METHODOLOGY

This section provides an overview of the methods employed in making observations and providing recommendations and conclusions derived from the audit procedures undertaken.

### 16.1 Audit Process

The site visit, data reviews and report drafting were undertaken by the ECO/auditor. The audit included the following procedures:

- Site Inspections. The areas and aspects covered during the inspections with concurrent discussions with the ESCO and site-based representatives of the EA holder included *inter alia*:
  - i. Access control to the sites.
  - ii. Ecologically sensitive areas, where applicable.
  - iii. Waste management.
  - iv. Incident and complaints management.
  - v. Landowner relations.
  - vi. Infrastructure management.
  - vii. Environmental Awareness.
  - viii. Record-keeping and document control.
  - ix. Stormwater and Erosion management
- Documentation review. This included:
  - i. A review of the EAs, EMPs and where applicable, method statements.
  - ii. A review of previous audit reports, records, observations, and findings.
  - iii. A review of any remedial and/or protective measures implemented.
  - iv. Identification, if applicable, any gaps requiring action and/or rectification.
- Audit Report compilation. This included:
  - i. Recording any observations and findings identified during the audit.
  - ii. Providing recommendations relating to improvement or non-compliance, if and where applicable.

### 16.2 Observation and Recommendation Determination

Observations and subsequent recommendations were based on and are limited to the following:

- i. Available documentation and records viewed or received prior, subsequent, or during the site visit;
- ii. Observations made during the period that the ECO/auditor was on site; and
- iii. Information received from both direct and cross-referenced discussions with permanent site-based staff.

### 16.3 Findings

Any key findings highlighted in this report will indicate areas and/or aspects that require improvement or rectification. The purpose of summarising the findings is to allow the EA holder to identify common management challenges that effect the level of compliance to the conditions of the EAs and EMPs.

Where findings and recommendations pertaining are deemed significant through compliance status or performance, they are documented as specific issues in the report. All site-specific observations are recorded in the corresponding audit checklist tables **(these are available upon request)**.

### 16.4 Audit Tables and Compliance Ratings

The audit table captures observations and recommendations made in relation to the conditions stipulated in the EAs and EMPs. It provides the reader with more detailed information in terms of what the stipulated requirements are in relation to the organisation's assessed current compliance status, according to the observations recorded by the auditor.

Ratings are calculated based on a scoring system whereby each auditable condition is provided with a score as highlighted in **Table 3** below.

**Table 4:** Compliance rating and scoring.

| Status                              | Compliance Rating |        | Scoring | Description                                                                                                                                                                                |
|-------------------------------------|-------------------|--------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | Abbreviation      | Symbol |         |                                                                                                                                                                                            |
| <i>Compliant</i>                    | C                 | ✓✓     | 2       | <i>No improvements required</i>                                                                                                                                                            |
| <i>Partially Compliant</i>          | PC                | ✓      | 1       | <i>Minor improvements required</i>                                                                                                                                                         |
| <i>Non-Compliant</i>                | NC                | ✗      | 0       | <i>Major improvements required</i>                                                                                                                                                         |
| <i>Not Applicable / Not Audited</i> | NA                | -      | -       | <i>No improvements required and / or the condition is either not, not yet or no longer relevant at the time of the audit</i>                                                               |
| <i>Informative</i>                  | info              | -      | -       | <i>These relate to informative elements that provide either useful information or are descriptive in the explanation and understanding of statements or concepts in the audit criteria</i> |

Each condition has been ascribed a colour-coded status indicator of Compliant (green), Partially Compliant (yellow), major-compliant (red), minor noncompliance (orange) Not Auditable/Audited (grey) and Informative (blank/white) to assist the reader in determining aspects that require attention to improve on compliance achieved, if and where applicable. No compliance scoring is attributed any of the audit criteria information pertaining to the latter two audit status symbols, namely 'NA' and 'info' as they were either not auditable and/or were not applicable/relevant at the time the audit was undertaken. In other words, they are excluded from the overall compliance rating calculations.

An overall compliance rating is calculated as a percentage to provide the reader with an overview of compliance to the relevant audit criteria however each condition should be considered on its own merits as the ratings do not necessarily portray the severity or impact of the reported finding relating to a condition.

## 17 ASSUMPTIONS AND LIMITATIONS

The ECO compliance audit and associated report are based upon the assumptions that:

- i. Documentation provided to the ECO/auditor is factual and true.
- ii. The audit is based purely on the conditions as stipulated in the EAs and EMPs.
- iii. The construction phase is currently underway and operational phase activities are not applicable.
- iv. Documentation / reports were randomly sampled / reviewed in order to accommodate time constraints.
- v. Where visual observations were not possible either due to physical access constraints or safety constraints, the ECO/auditor used other means to determine compliance, either through requesting written evidence provided by contractors / service providers who service the site or via interviews with technical site-based staff.

## 18 CONSULTATION PROCESS

The approach of consultation followed during the environmental audit was based on written (email) and telephonic correspondence between the ECO/auditor and the Environmental Site Compliance Officer which also includes consultation and communication with the EA holder and competent authority in terms of report submission.

## 19 FINDINGS

Findings are listed in the attached checklists, and it should be noted that findings should be considered individually in the context of the full audit and each condition and associated rating. The following findings were noted onsite:

- Alien vegetation establishment
- Due to the extent of vegetation cleared onsite erosion was noted.
- Waste is not being recycled.
- Oils/diesel spillage
- Sewerage Spillage
- Water ponding
- Poor condition of the access road
- Used drip trays were being left in the rain causing oil to flow on to the ground.
- Erosion onsite
- Adequate toilets must be provided to meet the 1: 15 toilet ratio.

Based on the outcomes of the audit it was established that the objectives of the EAs and EMPs were achieved in terms of:

- i. *Sufficiently providing for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis;*
- ii. *Ensuring compliance with the provisions of environmental authorisation and EMPs.*

### 19.1 Minor improvements required.

- Waste recycling must be done onsite.

### 19.2 Major improvements required.

- Maintenance of access roads
- Alien Vegetation removal
- Implementation of the Storm water measures
- Drip trays must be used when emptying chemical toilets.
- Provision of adequate toilets.
- Conducting toolbox talks on spillages.
- Quick removal and cleaning of spillages.

## 20 AUDIT SUMMARY

In terms of the findings and results of the **March 2025** ECO audit, the project achieved an overall **96.5%** compliance rating with the conditions of the EAs and EMPs.

Table 4: Compliance Scoring

| Virginia, Solar Park 1,2,3, Virginia Solar Park and Virginia OHPL, Free State Province |                                                                                                            |               |                          |                          |                                   |                  |
|----------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------|--------------------------|--------------------------|-----------------------------------|------------------|
| No.                                                                                    | Audit criteria                                                                                             | Compliant (C) | Partially Compliant (PC) | Major-non-Compliant (NC) | Not Applicable / Not Audited (NA) | Normative (info) |
| 1                                                                                      | Environmental Authorisation for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)                 | 50            | 0                        | 0                        | 6                                 | 0 (100%)         |
| 2                                                                                      | Environmental Authorisation for Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)                   | 50            | 0                        | 0                        | 6                                 | 0 (100%)         |
| 3                                                                                      | Environmental Authorisation for Virginia 3 Solar Park (DFFE REF NO: 14/12/16/3/3/2/2101)                   | 50            | 0                        | 0                        | 6                                 | 0 (100%)         |
| 4                                                                                      | Environmental Authorisation for Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2) | 47            | 0                        | 0                        | 3                                 | 0 (100%)         |
| 5                                                                                      | Environmental Authorisation for Virginia Solar Park OHPL (DFFE REF NO: 14/12/16/3/3/1/2444)                | 32            | 0                        | 0                        | 3                                 | 0 (100%)         |
| 6                                                                                      | EMPr for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)                                        | 291           | 17                       | 9                        | 14                                | 0 (94.56%)       |
| 7                                                                                      | EMPr Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)                                              | 289           | 14                       | 10                       | 16                                | 0 (94.33%)       |
| 8                                                                                      | EMPr Virginia 3 Solar Park (DFFE REF NO: 14/12/16/3/3/2/2101)                                              | 78            | 3                        | 3                        | 3                                 | 0 (95.67%)       |

| Virginia, Solar Park 1,2,3, Virginia Solar Park and Virginia OHPL, Free State Province |                                                                                 |                             |                          |                          |                                   |                  |
|----------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|-----------------------------|--------------------------|--------------------------|-----------------------------------|------------------|
| No.                                                                                    | Audit criteria                                                                  | Compliant (C)               | Partially Compliant (PC) | Major-non-Compliant (NC) | Not Applicable / Not Audited (NA) | Normative (info) |
| 9                                                                                      | EMPr Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2) | 214                         | 1                        | 1                        | 16                                | 0                |
| 10                                                                                     | EMPr Virginia Solar Park OHPL (DFFE REF NO: 14/12/16/3/3/1/2444)                | 82                          | 0                        | 0                        | 0                                 | 0                |
| Overall total no. conditions                                                           |                                                                                 | 1183                        | 35                       | 23                       | 49                                | 0                |
| Audited conditions                                                                     |                                                                                 | 2366                        | 35                       | 0                        | -                                 | -                |
| Scoring symbol                                                                         |                                                                                 | ✓✓                          | ✓                        | x                        | -                                 | -                |
| Overall Compliance Rating Calculation (%)                                              |                                                                                 | {[(2366+35+0)] /2580 } x100 |                          |                          |                                   |                  |
|                                                                                        |                                                                                 | 96.5%                       |                          |                          |                                   |                  |

## 21 RECOMMENDATIONS

**Based on the non-compliance identified following is recommended:**

- Chemical dust suppressants should be used on site. Due the extend of exposed sites using water to suppress dust will be costly.
- All standing trucks must be equipped with drip trays and spoiled materials must be scooped and stored in plastic bags before being disposed at a registered hazardous landfill site.
- Stormwater management plan must be submitted for approval and implementation.
- Access roads must be maintained.
- Drip trays must be cleaned timeously.
- Channels must be opened on the roads to drain ponding water.
- The Alien Vegetation Management Plan must be approved to manage alien vegetation,
- Only road worthy vehicles must be brought onsite.
- All spillages must be reported and cleaned promptly.

## 22 CONCLUSION

The contractor must ensure that systems and resources to monitor and manage environmental risks and impacts adequately are in place. Resources and personnel to train employees on the contents of the EMPs must be made to ensure that the project runs effectively and efficiently with minimal impact to the biophysical and socio-economic environment.

In general, the EMPs are effective in their current format in terms of content and relevance and there are no major shortcomings. The EMP's sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with this project.

**PREPARED BY:**

A handwritten signature in black ink, appearing to read 'Sakaunda'.

**Sakaunda Jennipher**

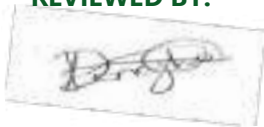
Environmental Control Officer

NCC Operations (Pty) Ltd

**M** ·069 510 7630

**E** · [jenniphers@ncc-group.co.za](mailto:jenniphers@ncc-group.co.za)

**REVIEWED BY:**

A handwritten signature in black ink, appearing to read 'Trevor O'Donoghue', enclosed in a rectangular box.

**Trevor O'Donoghue**

Senior Environmental Consultant

NCC Operations (Pty) Ltd

**M** ·084 465 4058

**E** ·[trevorod@ncc-group.co.za](mailto:trevorod@ncc-group.co.za)



## ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

### Open Concerns/Complaint

| No | Observation date | Concern/Complaint | Suggested Due Date <sup>1</sup> | Proposed Corrective Action | Status | Closure status |
|----|------------------|-------------------|---------------------------------|----------------------------|--------|----------------|
|    |                  |                   |                                 |                            |        |                |

*\*The concerns register is updated once the ECO is present on site.*

### Closed Concerns

| No | Observation date | Concern/Complaint | Due Date suggested by ECO | Corrective Action Taken | Outcome | Closure status |
|----|------------------|-------------------|---------------------------|-------------------------|---------|----------------|
|    |                  |                   |                           |                         |         |                |
|    |                  |                   |                           |                         |         |                |

## ANNEXURE B - NCR REGISTER

| Date | Type                                                                                            | Impact                                                                              | Description of Incident                          | Volume | Remedial Action                    |                          |
|------|-------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|--------------------------------------------------|--------|------------------------------------|--------------------------|
|      | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water pollution/ Soil<br>pollution/ Air<br>pollution/ Erosion/<br>Biodiversity etc. | What, Where, When,<br>How, why did it<br>happen? |        | Immediate<br>Corrective<br>Actions | Preventative<br>measures |

## ANNEXURE C - INCIDENT REGISTER

| Date           | Type                                                                                            | Impact                                                                                          | Description of Incident                                                                                                                                                                                                                                                                                                                                                                           | Volume | Remedial Action                                               |                                                                             |
|----------------|-------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---------------------------------------------------------------|-----------------------------------------------------------------------------|
|                | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/<br>Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When,<br>How, Why did it<br>happen?                                                                                                                                                                                                                                                                                                                                                  |        | Immediate<br>Corrective<br>Actions                            | Preventative<br>measures                                                    |
| 20/03<br>/2025 | Waste water                                                                                     | Soil pollution                                                                                  | On March 20, 2025, at approximately 8:28, the conservative tank being used to collect wastewater from conservancy tank had overfilled, and a Spillage had occurred spillage of approximately 8-10 litres of wastewater mixed with the cleaning material. the toilet supplier attended to the spill immediate & initiated spill Clean-up. Contaminated soil was taken to the hazardous waste skip. | 10 l   | Clean- up must be done as soon as the spills are identified . | The conservancy tank must be emptied more frequently to reduce overfilling. |
| 19/03<br>/2025 | Waste water                                                                                     | Soil pollution                                                                                  | Approximately 12 litres of wastewater mixed with the cleaning chemicals where toilets are located. The toilet had been leaking since the previous day and wastewater was contained in a drip tray. The toilet supplier was notified, and he came to service<br><br>The toilets; however, during servicing; the drip tray spilled over causing                                                     | 12l    | Clean- up must be done as soon as the spills are identified.  | Leaking toilets must not be allowed onsite.                                 |

| Date           | Type                                                                                            | Impact                                                                                          | Description of Incident                                                                                                                                                                                                                                                      | Volume | Remedial Action                                             |                                                                                 |
|----------------|-------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------------------------------------------------------|---------------------------------------------------------------------------------|
|                | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/<br>Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When,<br>How, Why did it<br>happen?                                                                                                                                                                                                                             |        | Immediate<br>Corrective<br>Actions                          | Preventative<br>measures                                                        |
|                |                                                                                                 |                                                                                                 | the spillage of the wastewater onto the ground.                                                                                                                                                                                                                              |        |                                                             |                                                                                 |
| 08/03<br>/2025 | Diesel spillage                                                                                 | Soil pollution                                                                                  | On 08 March 2025 at 05:30, security supervisor discovered a diesel leakage during the morning patrol. The spillage occurred due to the diesel injectors that were loose one of them was not properly fitted and diesel pressure removed them while the bakkie was in motion. | 20l    | Clean- up must be done as soon as the spills are identified | Vehicles must be maintained regular . only road worthy vehicles must be onsite. |
| 07/03<br>/2025 | Water and antifreeze                                                                            | Soil pollution                                                                                  | The Driver parked the minibus on site, shortly a leak observed containing a mixture of water and antifreeze, while also exhibiting signs of overheating.                                                                                                                     | -      | Clean- up must be done as soon as the spills are identified | Vehicles must be maintained regular . only road worthy vehicles must be onsite. |

## ANNEXURE D – PHOTOGRAPHS



**Figure 1:** Alien Vegetation that must be cleared.



**Figure 2:** Removed fences must be reused or appropriately disposed of.





**Figure 3:** Drip Trays being used onsite.



**Figure 4:** Roads requiring regrading



**Figure 5:** Erosion onsite



**Figure 6:** Water ponding onsite





**Figure 7:** Spillage from the toilet



**Figure 8:** Spillages that were not removed.



**Figure 9:** Drip tray with water



**Figure 10:** A Shaded area must be provided for people working on the powerline



**Figure 11:** No-go signs that were placed



**THIS PAGE WAS INTENTIONALLY LEFT BLANK**

**APRIL 2025**



---

# ECO MONTHLY ENVIRONMENTAL MONITORING REPORT

Virginia Photo Voltaic (PV) Solar Facility 1, 2 and 3,  
Matjhabeng, Lejweleputswa District Municipality within  
the jurisdiction of the Free State Province.

April 2025

---

**PREPARED FOR:**

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

Department of Forestry, Fisheries, and the Environment: Compliance Monitoring

**DATED:**

April 2025

**PREPARED BY:**

NCC Operations

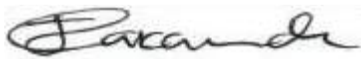
**T** • 021 702 2884

**E** • [info@ncc-group.co.za](mailto:info@ncc-group.co.za)

## DECLARATION OF INDEPENDENCE

I, Jennipher Sakaunda, as duly authorised representative of NCC Operations (Pty) Ltd ("**NCC**"), hereby confirm my independence (as well as that of NCC) as an auditor and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which URSA Energy (Pty) Ltd has appointed NCC as Environmental Control Officer ("**ECO**"), other than fair remuneration for work performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'Sakaunda', is shown on a light background.

**Jennipher Sakaunda**

05 May 2025

Environmental Control Officer

NCC Operations (Pty) Ltd

## **LIABILITY DISCLAIMER AND CONFIDENTIALITY CLAUSE**

All inspections conducted, as well as reports and recommendations provided by NCC are purely advisory. They are primarily intended for the purpose of assisting clients in loss control, risk management as well as health, safety, and environmental procedures.

Observations and recommendations are the result of practices and conditions observed, and information made available to us in various forms at the time of our visit. They do not purport to refer to or guarantee compliance with local or government regulations which may be applicable to such practices and conditions. This report should not be considered a definitive listing of all existing risks nor an absolute solution to all indicated risks, or hazards present from time to time in the Client Organisation. The report should always be considered in its entirety; individual sentences, paragraphs or sections of the report should not be used in isolation.

This report should not be reproduced except in its entirety, including this liability disclaimer or contents reproduced or disclosed to any third party without the prior written approval of NCC.

NCC assumes no responsibility for any losses incurred as a result of the implementation, management, and operation of recommended health, safety and environmental systems, processes and procedures.



## DOCUMENT CONTROL

|                     |                                                         |
|---------------------|---------------------------------------------------------|
| <b>REPORT TITLE</b> | Monthly ECO Environmental Monitoring Report             |
| <b>PROJECT</b>      | Virginia Solar PV 1, 2, 3 and Associated Infrastructure |
| <b>LOCATION</b>     | Free State Province                                     |
| <b>EA HOLDER</b>    | URSA Energy (Pty) Ltd                                   |
| <b>ECO</b>          | NCC Operations (Pty) Ltd                                |
| <b>REVISION</b>     | 00                                                      |
| <b>DATE</b>         | 05/05/2025                                              |

| Revision | Date       | Description                  |
|----------|------------|------------------------------|
| Rev 00   | 05/05/2025 | First Draft - Internal       |
| Rev 01   | TBC        | Final - Authority submission |

## REPORT DISTRIBUTION LIST

| Name                   | Organisation                      | Issued     | Format     |
|------------------------|-----------------------------------|------------|------------|
| Janine Brasington      | Red Rocket South Africa (Pty) Ltd | 05/05/2025 | Electronic |
| Serina Pillay          | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Maggie Logan           | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Director of Compliance | DFFE                              | TBC        | Electronic |

## TABLE OF CONTENTS

|                                                    |           |
|----------------------------------------------------|-----------|
| <b>ABBREVIATIONS .....</b>                         | <b>8</b>  |
| <b>1 INTRODUCTION .....</b>                        | <b>10</b> |
| 1.1 Background.....                                | 10        |
| 1.2 Audit Scope and Purpose.....                   | 12        |
| 1.3 Monitoring Frequency and Reporting.....        | 13        |
| <b>2 AUDITOR BACKGROUND. ....</b>                  | <b>14</b> |
| <b>3 GENERAL (NOTABLE EVENTS) .....</b>            | <b>15</b> |
| 3.1 General Outstanding matters.....               | 15        |
| 3.2 Audits (Internal and External).....            | 15        |
| <b>4 WASTE MANAGEMENT.....</b>                     | <b>16</b> |
| 4.1 Domestic/ General Waste.....                   | 16        |
| 4.2 Hazardous waste.....                           | 16        |
| 4.3 Wastewater .....                               | 16        |
| <b>5 PROTECTIVE MEASURES .....</b>                 | <b>17</b> |
| 5.1 General .....                                  | 17        |
| <b>6 ENVIRONMENTAL CONSERVATION.....</b>           | <b>18</b> |
| 6.1 Conservation of Flora and Fauna.....           | 18        |
| 6.2 Water Management.....                          | 18        |
| 6.3 Soil Management .....                          | 18        |
| 6.4 Stormwater and Erosion onsite .....            | 18        |
| <b>7 INFRASTRUCTURE MANAGEMENT.....</b>            | <b>19</b> |
| 7.1 Access Roads.....                              | 19        |
| 7.2 Fences, Gates, and Barricading.....            | 19        |
| 7.3 Buildings and Structures .....                 | 19        |
| <b>8 SOCIAL RESPONSIBILITY.....</b>                | <b>19</b> |
| <b>9 ENVIRONMENTAL AWARENESS AND TRAINING.....</b> | <b>20</b> |
| <b>10 HERITAGE.....</b>                            | <b>20</b> |
| <b>11 WARNING &amp; NCRS.....</b>                  | <b>20</b> |
| <b>12 REHABILITATION .....</b>                     | <b>21</b> |

|           |                                                        |           |
|-----------|--------------------------------------------------------|-----------|
| <b>13</b> | <b>INCIDENTS AND ACCIDENTS .....</b>                   | <b>21</b> |
| <b>14</b> | <b>MEETINGS AND OTHER CORRESPONDANCE.....</b>          | <b>21</b> |
| <b>15</b> | <b>AUDIT METHODOLOGY.....</b>                          | <b>22</b> |
| 15.1      | Audit Process.....                                     | 22        |
| 15.2      | Observation and Recommendation Determination.....      | 23        |
| 15.3      | Findings.....                                          | 23        |
| 15.4      | Audit Tables and Compliance Ratings .....              | 23        |
| <b>16</b> | <b>ASSUMPTIONS AND LIMITATIONS .....</b>               | <b>25</b> |
| <b>17</b> | <b>CONSULTATION PROCESS.....</b>                       | <b>25</b> |
| <b>18</b> | <b>FINDINGS .....</b>                                  | <b>26</b> |
| 18.1      | Minor improvements required. ....                      | 26        |
| 18.2      | Major improvements required.....                       | 26        |
| <b>19</b> | <b>AUDIT SUMMARY.....</b>                              | <b>27</b> |
| <b>20</b> | <b>RECOMMENDATIONS .....</b>                           | <b>29</b> |
| <b>21</b> | <b>CONCLUSION.....</b>                                 | <b>29</b> |
|           | <b>ANNEXURE A – CONCERNS/COMPLAINTS REGISTER .....</b> | <b>31</b> |
|           | <b>ANNEXURE B - NCR REGISTER .....</b>                 | <b>31</b> |
|           | <b>ANNEXURE C - INCIDENT REGISTER.....</b>             | <b>32</b> |
|           | <b>ANNEXURE D – PHOTOGRAPHS .....</b>                  | <b>34</b> |
|           | <b>THIS PAGE WAS INTENTIONALLY LEFT BLANK .....</b>    | <b>39</b> |

## TABLE OF FIGURES

|                                                                            |    |
|----------------------------------------------------------------------------|----|
| Figure 1: Alien Vegetation that must be cleared.....                       | 35 |
| Figure 2: Removed fences must be reused or appropriately disposed of. .... | 35 |
| Figure 3: Roads requiring regrading.....                                   | 36 |
| Figure 4: Spillage from the toilet .....                                   | 36 |
| Figure 5: Bins and Spill kits provided onsite.....                         | 37 |
| Figure 6: Erosion signs noted onsite.....                                  | 37 |
| Figure 7: Drip trays being used for refuelling. ....                       | 38 |
| Figure 8: Ongoing alien vegetation clearance .....                         | 38 |

## ABBREVIATIONS

|             |                                                         |
|-------------|---------------------------------------------------------|
| <b>BAR</b>  | Basic Assessment Report                                 |
| <b>CA</b>   | Competent Authority                                     |
| <b>DEA</b>  | Department of Environmental Affairs (now DFFE)          |
| <b>DFFE</b> | Department of Forestry, Fisheries, and the Environment  |
| <b>DWS</b>  | Department of Water and Sanitation                      |
| <b>EA</b>   | Environmental Authorisation                             |
| <b>EAP</b>  | Environmental Assessment Practitioner                   |
| <b>ECO</b>  | Environmental Control Officer                           |
| <b>EIA</b>  | Environmental Impact Assessment                         |
| <b>EMPr</b> | Environmental Management Programme                      |
| <b>EO</b>   | Environmental Officer (Contractor)                      |
| <b>ER</b>   | Employer's Representative                               |
| <b>ESCO</b> | Environmental Site Compliance Officer                   |
| <b>kV</b>   | Kilovolt                                                |
| <b>MVA</b>  | Megavolt Amperes                                        |
| <b>MW</b>   | Megawatt                                                |
| <b>NCC</b>  | NCC Operations                                          |
| <b>NCR</b>  | Non-Compliance Report                                   |
| <b>NEMA</b> | National Environmental Management Act (No. 107 of 1998) |
| <b>NWA</b>  | National Water Act (No. 36 of 1998)                     |

|             |                                 |
|-------------|---------------------------------|
| <b>OHPL</b> | Overhead Power Line             |
| <b>SDC</b>  | Safe Disposal Certificate       |
| <b>SHE</b>  | Safety, Health, and Environment |
| <b>SS</b>   | Substation                      |
| <b>TBC</b>  | To Be Confirmed                 |

# 1 INTRODUCTION

## 1.1 Background

NCC Operations (Pty) Ltd ("**NCC**") was appointed by URSA Energy (Pty) LTD ("**URSA**") to provide a suitably experienced independent Environmental Control Officer ("**ECO**") for the construction phase of Virginia Solar Park which will be connected to the Eskom Theseus Main Transmission Substation (MTS). The site is located on Farm Blomskraal 216, Ventersburg RD located within the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province. On completion the facility will consist of the Photovoltaic (PV) Power Plant with a maximum generation capacity up to 100 MW, a 132kV powerline connecting the substation to the Eskom Theseus substation which is located 16.2 km North-East of the north-western corner of project site.

The ECO has the responsibility of ensuring the mitigation/ rehabilitation measures and conditions referred to in the Environmental Authorisation ("**EA**") are implemented, as well as ensuring compliance with the requirements of the Environmental Management Programme ("**EMPr**"). This report provides an insight into the overall compliance performance and a summary of other environmental concerns and potential environmental risks through observations during site inspections.

This report is based on the following environmental conditions or requirements:

- a) Environmental Authorisations (EA)
  - 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
  - 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
  - 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)
  - 4) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
  - 5) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)
- b) Environmental Management Programmes (EMPr)
- c) Relevant environmental legislation.
- d) All other environmental permits, licenses, and authorisations.

The notification of commencement of construction was submitted to the DFFE for Virginia Solar Plant (Pty) Ltd on the 02 May 2024.

This report addresses conditions set out in the EA which states the ECO as part of their duties: *"The ECO must keep record of all activities on site, problems identified, transgressions noted, and a task schedule of tasks undertaken by the ECO."* As per the roles and responsibilities in the Virginia Solar Project ("VSP") EMPr, the primary role of the ECO will be to monitor the construction activities and ensure that the mitigation measures of the EMPr and Environmental Authorisations (EA) are implemented. This report also includes an audit checklist for the VSP EA as follows:

- 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
- 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
- 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)
- 4) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
- 5) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)

A summary of the various environmental requirements i.e. the audit criteria relating to the overall project is provided in **Table 1**.

**Table 1:** Summary of environmental requirements / criteria relating to the overall project.

| Components of overall project         | Environmental requirements / criteria |               |                                |          |
|---------------------------------------|---------------------------------------|---------------|--------------------------------|----------|
|                                       | DFFE EA Ref No.                       | Issue date    | Approved EMPr<br>(Compiled by) | Date     |
| Virginia 1 Solar Park                 | 14/12/16/3/3/2/2099/1                 | 20 April 2022 | AGES Limpopo (Pty) Ltd         | Jan 2022 |
| Virginia 2 Solar Park                 | 14/12/16/3/3/2/2100                   | 20 May 2022   | AGES Limpopo (Pty) Ltd         | Jan 2022 |
| Virginia 3 Solar Park                 | 14/12/16/3/3/2/2101                   | 20 April 2022 | AGES Limpopo (Pty) Ltd         | Feb 2022 |
| Virginia Solar Park Switching Station | 14/12/16/3/3/2/2099/2                 | 20 April 2022 | AGES Limpopo (Pty) Ltd         | Jan 2022 |
| Virginia Solar Park OHPL              | 14/12/16/3/3/1/2444                   | 02 Feb 2022   | AGES Limpopo (Pty) Ltd         | Dec 2021 |

This report represents the monitoring for the Construction Phase. The responsibility of enforcement of the conditions of the EAs and EMPrs lies with the Project and Project Manager, while the Department of Forestry, Fisheries, and the Environment ("DFFE") Environmental Management Inspectorate ("EMI") may also enforce existing and potentially new conditions through compliance notices.



An Environmental Site Compliance Officer (“**ESCO**”) has been appointed by the holder of the EA to monitor the project compliance onsite on a full-time basis on behalf of the EA holder. The responsibilities of the ESCO includes:

- Monitoring conditions of the Basic Assessment Reports (“**BARs**”), Environmental Impact Report (**EIR**) EAs and the EMPs.
- Ensuring compliance with all relevant environmental legislation.
- Approving method statements (reviewed by the ECO and co-approved by Site Manager).
- Remaining employed until the completion of the construction activities.
- Reporting to the Project Manager, including all findings identified onsite.
- Reporting any significant findings to the ECO.
- Preparing and submitting monthly reports to the ECO and Project Manager.
- Monitoring compliance by the Contractor.

In addition, the ESCO will:

- Undertake daily inspections of the site and surrounding areas.
- Audit compliance with the EMPs and conditions of the environmental authorisation.
- Take appropriate action if the specifications contained in the EMPs and conditions of the environmental authorisation are not followed.
- Monitor and verify that environmental impacts are kept to a minimum, as far as possible; and
- Ensure that activities onsite comply with all relevant environmental legislation.

## 1.2 Audit Scope and Purpose.

In accordance with Regulation 34 of the 2014 NEMA EIA Regulations (as amended) the holder of an environmental authorisation must, for the period during which the EA and EMPs, and where applicable the closure plan, remain valid —

- a) *Ensure that the compliance with the conditions of the EA and the EMPs, and where applicable the closure plan, is audited; and*
- b) *Submit an environmental audit report to the relevant competent authority.*

The purpose of this environmental audit is to verify compliance to the overarching environmental requirements specified as conditions of the EAs and EMPs, and report on the extent to which the objectives of the EMPs and are being achieved.

### **1.3 Monitoring Frequency and Reporting.**

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 14<sup>th</sup> of April 2025 after which this report was compiled which serves to document and audit. This report covers the monthly reporting for the month of April 2025.

## 2 AUDITOR BACKGROUND.

NCC is a multi-disciplinary environmental consulting company based in South Africa which adopts a 'values driven' approach with a common purpose to conserve and create sustainable environments that enable people, planet and business to thrive. We are a trusted partner to major engineering and construction firms, mines, parastatals, film, sports and event production companies, municipalities, provincial and national government, and conservation organisations. Drawing on our years of experience on a wide range of projects, NCC works with our clients to develop, implement, and monitor customised services that add real value.

The auditor, Jennipher Sakaunda, is a senior environmental manager with more than 14 years' experience currently employed with NCC. Jennipher Sakaunda has experience in several environmental fields including environmental compliance monitoring and auditing, due diligence assessment, environmental impact and risk assessment, and compilation of environmental management plans/programmes.

**Table 2:** Details of the auditor.

|                       |                                                                                                                                                                                                |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Company</b>        | NCC Operations (Pty) Ltd                                                                                                                                                                       |
| <b>Auditor</b>        | Jennipher Sakaunda                                                                                                                                                                             |
| <b>Tel</b>            | +27 21 702 2884                                                                                                                                                                                |
| <b>Mobile</b>         | +27 69 510 7630                                                                                                                                                                                |
| <b>Email</b>          | <a href="mailto:jenniphers@ncc-group.co.za">jenniphers@ncc-group.co.za</a>                                                                                                                     |
| <b>Address</b>        | 26 Bell Close, Westlake Business Park Westlake, 7945                                                                                                                                           |
| <b>Affiliation</b>    | International Association of Impact Assessment South Africa.<br>Environmental Assessment Practitioner Association of South Africa.<br>South African Council of Natural Scientific Professions. |
| <b>Qualifications</b> | BSc (honors) Environmental Management                                                                                                                                                          |
| <b>Expertise</b>      | A detailed CV can be provided on request.                                                                                                                                                      |

### 3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (April 2025) included the following:

- Site establishment for the construction of the switching station and the OHPL.
- Clearing and grubbing works at the switching station area.
- Surveying and pegging of the OHPL and excavation of foundations.
- Installation of modular office units; TSF carport and internal road construction; access road construction
- Fencing
- Clearing and grubbing of PV area and levelling works.
- Site Establishment

#### 3.1 General Outstanding matters

Any major outstanding matters are to be recorded and summarised in the Concerns Register (**Annexure A**). The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

#### 3.2 Audits (Internal and External)

Internal audits are undertaken monthly by the Red Rocket ESCO. This ECO Audit was undertaken on the 14<sup>th</sup> of April 2025. Audit tables/checklists are attached to this report. The ECO undertakes external monthly audits.

## 4 WASTE MANAGEMENT

The contractor must make provision for waste avoidance, minimisation, and separation of waste where possible through recycling efforts. Waste management awareness must be done on an ongoing basis and must be provided through toolbox talks and awareness posters. The EMPr requires waste to be recycled. To ensure compliance the contractor has put out an RFQ to secure a service provider. The contractor is busy with selecting a service provide who will recycle waste onsite.

### 4.1 Domestic/ General Waste

Approximately **98kg** of **general waste** and **10200 kg** of **wood** was removed from site in the month of April 2025. Designated waste areas have been provided at the contractors' main site offices/laydown areas for purposes of temporary storage of waste prior to collection and transferal to the licensed waste facilities. No waste materials from the site were recycled this month. All cleared alien vegetation must be treated as waste and disposed of at a registered licensed landfill.

The service providers dispose the general waste at Matjhabeng Local Municipality waste disposal site-Licence number: B33/2/340/21/P8 16/2/7/C404/D2/Z1/P367. Proof of disposal is available on request.

### 4.2 Hazardous waste

Hazardous waste skips are available at the dedicated waste storage area at each of the sub-contractors' site offices/lay down areas. No (**0m<sup>3</sup>**) hazardous waste was disposed of in April 2025. Hazardous waste in form of oil spillages, cement spillages and contaminated soil is kept onsite until there is enough to dispose.

### 4.3 Wastewater

Approximately **12 494 L** of sewerage waste was generated on site in the month of April 2025. Chemical toilets and a conservancy tank have been provided onsite. The conservancy tank onsite that was displaced due to heavy rains and poor storm water management was fixed. The General Authorisation that was issued by DWS for the includes the use of a conservancy tank up to a capacity of 50 000l. The conservancy tank onsite has a capacity of 12 500l which is below the stipulated GA threshold. The contractor must ensure that this capacity is not exceeded.

The Appointed Service Provider removes sewage and dispose of it at Matjhabeng Local Municipality wastewater treatment facility - Licence No: 10/D4/J/G/2082. Proof of disposal is available onsite. The contractor must ensure the appointed service provider is licenced to provide sewer removal services. Additionally, adequate ablution facilities must be always provided.

## 5 PROTECTIVE MEASURES

### 5.1 General

Protective measures have been deployed to mitigate environmental impacts or prevent impacts from occurring which includes:

- Security guards are present on the site, with access control in place.
- Induction training is conducted for all persons working and visiting the site.
- Snake gaiters are provided.
- Spill kits.
- No-go areas are demarcated and provided with signage.
- Access cards

## 6 ENVIRONMENTAL CONSERVATION

### 6.1 Conservation of Flora and Fauna

A permit to clear the site and relocate species of concern was received from the Free state Department of Economic, Small Business Development, Tourism and Environmental Affairs. The permit with Ref No. 202306000012649 was issued on 08/06/2023 to pluck protected and unprotected flora. Alien Vegetation has established on site on the cleared areas. The Alien Plant Management Plan submitted and approved. On the 30<sup>th</sup> of April 2025 the contractor started clearing alien vegetation on Block 1. All cleared alien vegetation must be disposed at the Matjhabeng Local Municipality waste disposal site. The cleared areas must be monitored to ensure the alien vegetation does not reestablish.

### 6.2 Water Management

Approximately **390 m<sup>3</sup>** of water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The contractor must ensure water abstraction does not exceed the licenced volumes.

### 6.3 Soil Management

There are stockpiles of topsoil onsite that must be protected from erosion. Since the stormwater management plan was approved measure to prevent erosion must be put in place. Topsoil and subsoil from the excavation of must be stored separately. Alien vegetation has established on the stockpiles and must be cleared.

### 6.4 Stormwater and Erosion onsite

Due to the extent of the vegetation that was cleared onsite, stormwater and erosion have become a problem onsite.

The contractor's Stormwater Management Plan was approved, measures manage erosion as per the approved SWMP must be implemented to prevent erosion and water ponding. This must include opening drains to prevent water ponding, addressing eroded and diverting storm water away from construction areas. Clean stormwater must be diverted away from the works towards the watercourses.

## **7 INFRASTRUCTURE MANAGEMENT**

### **7.1 Access Roads**

The project team is using existing farm roads for current construction activities until such time as the project access roads and internal roads have been constructed. The existing access roads must be maintained to address water ponding and erosion.

### **7.2 Fences, Gates, and Barricading**

The site is fenced with security personnel manning the gates. Access cards are used to allow entrance to site. Barricading was observed on site, and such should continue to be maintained around all open excavations along the OHPL servitudes to prevent potential fauna (wildlife and livestock) incidents. Old farm fences that have been removed, should they not be used they must be disposed of properly.

### **7.3 Buildings and Structures**

Containers have been established on site by various subcontractors that are being used as offices. Male and female ablation facilities have been provided. Chemical toilets and a conservancy tank are used to manage sewer onsite.

## **8 SOCIAL RESPONSIBILITY**

Any complaints from the public are to be recorded on complaints register maintained by the Contractor whose responsibility it is to track and resolve the complaints/issues that are raised. In addition, a box for receiving internal grievances is present at the main site office facility which allows for project staff to bring to the attention of the project management team any comments and or concerns.



## 9 ENVIRONMENTAL AWARENESS AND TRAINING

The contractor has undertaken Toolbox talks for the month of April 2025 covering the following topics:

- Water Use Licence
- Land Pollution
- Protection of Animals onsite
- Environmental Induction
- Environmental Authorisation
- Water Usage
- Waste Management
- House Keeping
- Emergency Procedures
- Reporting Environmental hazards
- Chance Find

## 10 HERITAGE

In the event of any unknown artefacts being uncovered during construction, the ESCO and Project Manager must be informed immediately who must then instruct work to be stopped in the immediate area and then promptly report the discovery/finding to the ECO, a heritage specialist and the relevant heritage authority to investigate and confirm if such discovery is in fact a heritage artefact of any significance. No activities impacting upon any heritage sites were reported during this reporting period.

## 11 WARNING & NCRS

No NCR reports were issued by the ECO in the month of April.

## 12 REHABILITATION

No rehabilitation works have commenced during this period, further rehabilitation is expected to occur on the project as and when other works have been completed.

## 13 INCIDENTS AND ACCIDENTS

All environmental related events, incidents and accidents are to be reported directly to the ECO and kept on a central register and included in the monthly report. No environmental incidents that occurred in April. A register of environmental incidents is attached as **Annexure C**.

## 14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 14<sup>th</sup> of April 2025 with observations documented in this report. Monthly ECO compliance reports are submitted to the Department (DFFE) by the ECO.

## 15 AUDIT METHODOLOGY

This section provides an overview of the methods employed in making observations and providing recommendations and conclusions derived from the audit procedures undertaken.

### 15.1 Audit Process

The site visit, data reviews and report drafting were undertaken by the ECO/auditor. The audit included the following procedures:

- **Site Inspections.** The areas and aspects covered during the inspections with concurrent discussions with the ESCO and site-based representatives of the EA holder included *inter alia*:
  - i. Access control to the sites.
  - ii. Ecologically sensitive areas, where applicable.
  - iii. Waste management.
  - iv. Incident and complaints management.
  - v. Landowner relations.
  - vi. Infrastructure management.
  - vii. Environmental Awareness.
  - viii. Record-keeping and document control.
  - ix. Stormwater and Erosion management
- **Documentation review.** This included:
  - i. A review of the EAs, EMPs and where applicable, method statements.
  - ii. A review of previous audit reports, records, observations, and findings.
  - iii. A review of any remedial and/or protective measures implemented.
  - iv. Identification, if applicable, any gaps requiring action and/or rectification.
- **Audit Report compilation.** This included:
  - i. Recording any observations and findings identified during the audit.
  - ii. Providing recommendations relating to improvement or non-compliance, if and where applicable.

## 15.2 Observation and Recommendation Determination

Observations and subsequent recommendations were based on and are limited to the following:

- i. Available documentation and records viewed or received prior, subsequent, or during the site visit.
- ii. Observations made during the period that the ECO/auditor was on site; and
- iii. Information received from both direct and cross-referenced discussions with permanent site-based staff.

## 15.3 Findings

Any key findings highlighted in this report will indicate areas and/or aspects that require improvement or rectification. The purpose of summarising the findings is to allow the EA holder to identify common management challenges that effect the level of compliance to the conditions of the EAs and EMPs.

Where findings and recommendations pertaining are deemed significant through compliance status or performance, they are documented as specific issues in the report. All site-specific observations are recorded in the corresponding audit checklist tables.

## 15.4 Audit Tables and Compliance Ratings

The audit table captures observations and recommendations made in relation to the conditions stipulated in the EAs and EMPs. It provides the reader with more detailed information in terms of what the stipulated requirements are in relation to the organisation's assessed current compliance status, according to the observations recorded by the auditor.

Ratings are calculated based on a scoring system whereby each auditable condition is provided with a score as highlighted in **Table 3** below.

**Table 4:** Compliance rating and scoring.

| Status                              | Compliance Rating |         | Description                                                                                                                                                                                |
|-------------------------------------|-------------------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | Abbreviation      | Scoring |                                                                                                                                                                                            |
| <i>Compliant</i>                    | C                 | 2       | <i>No improvements required</i>                                                                                                                                                            |
| <i>Partially Compliant</i>          | PC                | 1       | <i>Minor improvements required</i>                                                                                                                                                         |
| <i>Non-Compliant</i>                | NC                | 0       | <i>Major improvements required</i>                                                                                                                                                         |
| <i>Work in Progress</i>             | WiP               | -       | <i>Environmental management measures are underway but not yet fully implemented or verified, requiring further monitoring and assessment.</i>                                              |
| <i>Not Applicable / Not Audited</i> | NA                | -       | <i>No improvements required and / or the condition is either not, not yet or no longer relevant at the time of the audit</i>                                                               |
| <i>Informative</i>                  | info              | -       | <i>These relate to informative elements that provide either useful information or are descriptive in the explanation and understanding of statements or concepts in the audit criteria</i> |

Each condition has been ascribed a colour-coded status indicator of Compliant (green), Partially Compliant (orange), major-compliant (red), Not Auditable/Audited (grey), Work in Progress (light red) and Informative (blank/white) to assist the reader in determining aspects that require attention to improve on compliance achieved, if and where applicable. No compliance scoring is attributed any of the audit criteria information pertaining to the following three audit status symbols, namely 'NA', 'WiP', and 'info' as they were either not auditable and/or were not applicable/relevant at the time the audit was undertaken. In other words, they are excluded from the overall compliance rating calculations.

An overall compliance rating is calculated as a percentage to provide the reader with an overview of compliance to the relevant audit criteria however each condition should be considered on its own merits as the ratings do not necessarily portray the severity or impact of the reported finding relating to a condition.

## 16 ASSUMPTIONS AND LIMITATIONS

The ECO compliance audit and associated report are based upon the assumptions that:

- i. Documentation provided to the ECO/auditor is factual and true.
- ii. The audit is based purely on the conditions as stipulated in the EAs and EMPs.
- iii. The construction phase is currently underway and operational phase activities are not applicable.
- iv. Documentation / reports were randomly sampled / reviewed in order to accommodate time constraints.
- v. Where visual observations were not possible either due to physical access constraints or safety constraints, the ECO/auditor used other means to determine compliance, either through requesting written evidence provided by contractors / service providers who service the site or via interviews with technical site-based staff.

## 17 CONSULTATION PROCESS

The approach of consultation followed during the environmental audit was based on written (email) and telephonic correspondence between the ECO/auditor and the Environmental Site Compliance Officer which also includes consultation and communication with the EA holder and competent authority in terms of report submission.

## 18 FINDINGS

Findings are listed in the attached checklists, and it should be noted that findings should be considered individually in the context of the full audit and each condition and associated rating.

The following findings were noted onsite:

- Clearance of alien vegetation is on-going.
- Due to the extent of vegetation cleared onsite erosion was noted.
- Poor condition of the access road.
- Topsoil stockpile was placed in a drainage line

Based on the outcomes of the audit it was established that the objectives of the EAs and EMPs were achieved in terms of:

- Sufficiently providing for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis.*
- Ensuring compliance with the provisions of environmental authorisation and EMPs.*

### 18.1 Minor improvements required.

- Waste recycling must be done onsite.

### 18.2 Major improvements required.

- Maintenance of access roads.
- Implementation of the Storm water measures.

## 19 AUDIT SUMMARY

In terms of the findings and results of the **April 2025** ECO audit, the project achieved an overall **95.7%** compliance rating with the conditions of the EAs and EMPs.

Table 4: Compliance Scoring

| No. | Audit criteria                                                                                             | Compliant (C) | Partially Compliant (PC) | Major-non-Compliant (NC) | Work in Progress | Normative (info) | Not Applicable / Not Audited (NA) | Percentage Score |
|-----|------------------------------------------------------------------------------------------------------------|---------------|--------------------------|--------------------------|------------------|------------------|-----------------------------------|------------------|
| 1   | Environmental Authorisation for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)                 | 23            | 1                        | 1                        | 1                | 19               | 3                                 | (94%)            |
| 2   | Environmental Authorisation for Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)                   | 23            | 1                        | 1                        | 1                | 19               | 3                                 | (94%)            |
| 3   | Environmental Authorisation for Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)                   | 23            | 1                        | 1                        | 1                | 19               | 3                                 | (94%)            |
| 4   | Environmental Authorisation for Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)                | 23            | 1                        | 0                        | 1                | 18               | 3                                 | (98%)            |
| 5   | Environmental Authorisation for Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2) | 24            | 1                        | 1                        | 1                | 19               | 3                                 | (94%)            |
| 6   | EMPr for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)                                        | 259           | 12                       | 3                        | 0                | 11               | 35                                | (97%)            |
| 7   | EMPr Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)                                              | 258           | 12                       | 3                        | 0                | 10               | 37                                | (97%)            |
| 8   | EMPr Virginia 3 Solar Park (DFFE REF NO: 14/12/16/3/3/2/2101)                                              | 220           | 15                       | 8                        | 0                | 42               | 39                                | (94%)            |



| No.                                       | Audit criteria                                                                  | Compliant (C) | Partially Compliant (PC) | Major-non-Compliant (NC) | Work in Progress | Normative (info) | Not Applicable / Not Audited (NA) | Percentage Score      |
|-------------------------------------------|---------------------------------------------------------------------------------|---------------|--------------------------|--------------------------|------------------|------------------|-----------------------------------|-----------------------|
| 9                                         | EMPr Virginia Solar Park OHPL (DFFE REF NO: 14/12/16/3/3/1/2444)                | 202           | 6                        | 3                        | 0                | 61               | 56                                | (97%)                 |
| 10                                        | EMPr Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2) | 156           | 3                        | 1                        | 0                | 37               | 30                                | (98%)                 |
| Overall total no. conditions              |                                                                                 | 1211          | 53                       | 22                       | 5                | 255              | 212                               | <b>2578</b>           |
| Audited conditions                        |                                                                                 | 2422          | 53                       | 0                        | 0                | -                | -                                 | (Potential max score) |
| Score                                     |                                                                                 | <b>2422</b>   | <b>36</b>                | <b>0</b>                 | -                | -                | -                                 |                       |
| Overall Compliance Rating Calculation (%) |                                                                                 | <b>95.7%</b>  |                          |                          |                  |                  |                                   |                       |

## 20 RECOMMENDATIONS

**Based on the findings identified the following is recommended:**

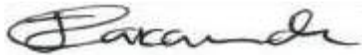
- Stormwater measures as outlined in the approved stormwater management plan must be implemented
- Access roads must be maintained.
- Channels must be opened on the roads to drain ponding water.
- The Alien Vegetation must be cleared as per the approved Alien Vegetation Management Plan .
- Areas cleared of alien vegetation must be monitored to prevent re-establishment.
- Topsoil placed in the drainage channel must be removed.
- Drip trays must be used when cleaning and emptying chemical toilets.

## 21 CONCLUSION

The contractor must ensure that systems and resources to monitor and manage environmental risks and impacts adequately are in place. Resources and personnel to train employees on the contents of the EMPs must be made to ensure that the project runs effectively and efficiently with minimal impact to the biophysical and socio-economic environment.

In general, the EMPs are effective in their current format in terms of content and relevance and there are no major shortcomings. The EMP's sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with this project.

**PREPARED BY:**

A handwritten signature in black ink, appearing to read 'Sakaunda'.

**Sakaunda Jennipher**

Environmental Control Officer

NCC Operations (Pty) Ltd

**M** ·069 510 7630

**E** · [jenniphers@ncc-group.co.za](mailto:jenniphers@ncc-group.co.za)

**REVIEWED BY:**

A handwritten signature in black ink, appearing to read 'Nick Gates'.

**Nick Gates**

Senior Environmental Consultant

NCC Operations (Pty) Ltd

**M** ·073 1998 431

**E** ·[nickg@ncc-group.co.za](mailto:nickg@ncc-group.co.za)

## ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

### Open Concerns/Complaint

| No | Observation date | Concern/Complaint | Suggested Due Date <sup>1</sup> | Proposed Corrective Action | Status | Closure status |
|----|------------------|-------------------|---------------------------------|----------------------------|--------|----------------|
|    |                  |                   |                                 |                            |        |                |

*\*The concerns register is updated once the ECO is present on site.*

### Closed Concerns

| No | Observation date | Concern/Complaint | Due Date suggested by ECO | Corrective Action Taken | Outcome | Closure status |
|----|------------------|-------------------|---------------------------|-------------------------|---------|----------------|
|    |                  |                   |                           |                         |         |                |
|    |                  |                   |                           |                         |         |                |

## ANNEXURE B - NCR REGISTER

| Ref No. | Originator | Dated Issued | Description | Proposed Corrective Action | Closure Status | Closure Date | Further Action Required |
|---------|------------|--------------|-------------|----------------------------|----------------|--------------|-------------------------|
|         |            |              |             |                            |                |              |                         |

## ANNEXURE C - INCIDENT REGISTER

| Date           | Type                                                                                           | Impact                                                                                          | Description of Incident                                                                                                                                                                                                                                                                                                                                                                   | Volume | Remedial Action                                               |                                                                             |
|----------------|------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---------------------------------------------------------------|-----------------------------------------------------------------------------|
|                | Chemical Spill/<br>Sewage/ Waste/<br>Fauna &Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/<br>Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When,<br>How, Why did it<br>happen?                                                                                                                                                                                                                                                                                                                                          |        | Immediate<br>Corrective<br>Actions                            | Preventative<br>measures                                                    |
| 20/03<br>/2025 | Waste water                                                                                    | Soil pollution                                                                                  | O20, 2025, at approximately 8:28, the conservative tank being used to collect wastewater from conservancy tank had overfilled, and a Spillage had occurred spillage of approximately 8-10 litres of wastewater mixed with the cleaning material. the toilet supplier attended to the spill immediate & initiated spill Clean-up. Contaminated soil was taken to the hazardous waste skip. | 10 l   | Clean- up must be done as soon as the spills are identified . | The conservancy tank must be emptied more frequently to reduce overfilling. |
| 19/03<br>/2025 | Waste water                                                                                    | Soil pollution                                                                                  | Approximately 12 litres of wastewater mixed with the cleaning chemicals where toilets are located. The toilet had been leaking since the previous day and wastewater was contained in a drip tray. The toilet supplier was notified, and he came to service<br><br>The toilets; however, during servicing; the drip tray spilled over causing                                             | 12l    | Clean- up must be done as soon as the spills are identified.  | Leaking toilets must not be allowed onsite.                                 |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                      | Volume | Remedial Action                                             |                                                                                 |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------------------------------------------------------|---------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                   |        | Immediate Corrective Actions                                | Preventative measures                                                           |
|            |                                                                                  |                                                                            | the spillage of the wastewater onto the ground.                                                                                                                                                                                                                              |        |                                                             |                                                                                 |
| 08/03/2025 | Diesel spillage                                                                  | Soil pollution                                                             | On 08 March 2025 at 05:30, security supervisor discovered a diesel leakage during the morning patrol. The spillage occurred due to the diesel injectors that were loose one of them was not properly fitted and diesel pressure removed them while the bakkie was in motion. | 20l    | Clean- up must be done as soon as the spills are identified | Vehicles must be maintained regular . only road worthy vehicles must be onsite. |
| 07/03/2025 | Water and antifreeze                                                             | Soil pollution                                                             | The Driver parked the minibus on site, shortly a leak observed containing a mixture of water and antifreeze, while also exhibiting signs of overheating.                                                                                                                     | -      | Clean- up must be done as soon as the spills are identified | Vehicles must be maintained regular . only road worthy vehicles must be onsite. |

## **ANNEXURE D – PHOTOGRAPHS**



**Figure 1:** Alien Vegetation that must be cleared.



**Figure 2:** Removed fences must be reused or appropriately disposed of.





**Figure 3:** Roads requiring regrading



**Figure 4:** Spillage from the toilet



**Figure 5:** Bins and Spill kits provided onsite.



**Figure 6:** Erosion signs noted onsite.





**Figure 7:** Drip trays being used for refuelling.



**Figure 8:** Ongoing alien vegetation clearance

**THIS PAGE WAS INTENTIONALLY LEFT BLANK**

**MAY 2025**



---

# ECO MONTHLY ENVIRONMENTAL MONITORING REPORT

Virginia OHL Line and Switching Station Matjhabeng,  
Lejweleputswa District Municipality within the jurisdiction  
of the Free State Province.

---

**PREPARED FOR:**

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

Department of Forestry, Fisheries, and the Environment: Compliance Monitoring

**DATED:**

May 2025

**PREPARED BY:**

NCC Operations

T • 021 702 2884

E • [info@ncc-group.co.za](mailto:info@ncc-group.co.za)

## DECLARATION OF INDEPENDENCE

I, Jennipher Sakaunda, as duly authorised representative of NCC Operations (Pty) Ltd ("**NCC**"), hereby confirm my independence (as well as that of NCC) as an auditor and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which URSA Energy (Pty) Ltd has appointed NCC as Environmental Control Officer ("**ECO**"), other than fair remuneration for work performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'Sakaunda', is positioned below the 'Signed:' text.

**Jennipher Sakaunda**

03 June 2025

Environmental Control Officer

NCC Operations (Pty) Ltd

## **LIABILITY DISCLAIMER AND CONFIDENTIALITY CLAUSE**

All inspections conducted, as well as reports and recommendations provided by NCC are purely advisory. They are primarily intended for the purpose of assisting clients in loss control, risk management as well as health, safety, and environmental procedures.

Observations and recommendations are the result of practices and conditions observed, and information made available to us in various forms at the time of our visit. They do not purport to refer to or guarantee compliance with local or government regulations which may be applicable to such practices and conditions. This report should not be considered a definitive listing of all existing risks nor an absolute solution to all indicated risks, or hazards present from time to time in the Client Organisation. The report should always be considered in its entirety; individual sentences, paragraphs or sections of the report should not be used in isolation.

This report should not be reproduced except in its entirety, including this liability disclaimer or contents reproduced or disclosed to any third party without the prior written approval of NCC.

NCC assumes no responsibility for any losses incurred as a result of the implementation, management, and operation of recommended health, safety and environmental systems, processes and procedures.



## DOCUMENT CONTROL

|                     |                                             |
|---------------------|---------------------------------------------|
| <b>REPORT TITLE</b> | Monthly ECO Environmental Monitoring Report |
| <b>PROJECT</b>      | Virginia OPL Line and Switching Station     |
| <b>LOCATION</b>     | Free State Province                         |
| <b>EA HOLDER</b>    | URSA Energy (Pty) Ltd                       |
| <b>ECO</b>          | NCC Operations (Pty) Ltd                    |
| <b>REVISION</b>     | 00                                          |
| <b>DATE</b>         | 03/06/2025                                  |

| Revision | Date       | Description                  |
|----------|------------|------------------------------|
| Rev 00   | 03/06/2025 | First Draft - Internal       |
| Rev 01   | TBC        | Final - Authority submission |

## REPORT DISTRIBUTION LIST

| Name                   | Organisation                      | Issued     | Format     |
|------------------------|-----------------------------------|------------|------------|
| Janine Brasington      | Red Rocket South Africa (Pty) Ltd | 03/06/2025 | Electronic |
| Serina Pillay          | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Maggie Logan           | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Director of Compliance | DFFE                              | TBC        | Electronic |

## TABLE OF CONTENTS

|                                                    |           |
|----------------------------------------------------|-----------|
| <b>TABLE OF FIGURES .....</b>                      | <b>7</b>  |
| <b>ABBREVIATIONS .....</b>                         | <b>8</b>  |
| <b>1 INTRODUCTION .....</b>                        | <b>10</b> |
| 1.1 Background.....                                | 10        |
| 1.2 Audit Scope and Purpose.....                   | 12        |
| 1.3 Monitoring Frequency and Reporting.....        | 12        |
| <b>2 AUDITOR BACKGROUND. ....</b>                  | <b>13</b> |
| <b>3 GENERAL (NOTABLE EVENTS) .....</b>            | <b>14</b> |
| 3.1 General Outstanding matters.....               | 14        |
| 3.2 Audits (Internal and External).....            | 14        |
| <b>4 WASTE MANAGEMENT.....</b>                     | <b>15</b> |
| 4.1 Domestic/ General Waste.....                   | 15        |
| 4.2 Hazardous waste.....                           | 15        |
| 4.3 Wastewater .....                               | 15        |
| <b>5 PROTECTIVE MEASURES .....</b>                 | <b>16</b> |
| 5.1 General .....                                  | 16        |
| <b>6 ENVIRONMENTAL CONSERVATION.....</b>           | <b>17</b> |
| 6.1 Conservation of Flora and Fauna.....           | 17        |
| 6.2 Water Management.....                          | 17        |
| 6.3 Soil Management .....                          | 17        |
| 6.4 Stormwater and Erosion onsite .....            | 17        |
| <b>7 INFRASTRUCTURE MANAGEMENT.....</b>            | <b>18</b> |
| 7.1 Access Roads.....                              | 18        |
| 7.2 Fences, Gates, and Barricading.....            | 18        |
| 7.3 Buildings and Structures .....                 | 18        |
| <b>8 SOCIAL RESPONSIBILITY.....</b>                | <b>18</b> |
| <b>9 ENVIRONMENTAL AWARENESS AND TRAINING.....</b> | <b>19</b> |
| <b>10 HERITAGE.....</b>                            | <b>20</b> |
| <b>11 WARNING &amp; NCRS.....</b>                  | <b>20</b> |

|           |                                                        |           |
|-----------|--------------------------------------------------------|-----------|
| <b>12</b> | <b>REHABILITATION .....</b>                            | <b>21</b> |
| <b>13</b> | <b>INCIDENTS AND ACCIDENTS .....</b>                   | <b>21</b> |
| <b>14</b> | <b>MEETINGS AND OTHER CORRESPONDANCE.....</b>          | <b>21</b> |
| <b>15</b> | <b>AUDIT METHODOLOGY.....</b>                          | <b>22</b> |
| 15.1      | Audit Process.....                                     | 22        |
| 15.2      | Observation and Recommendation Determination.....      | 23        |
| 15.3      | Findings.....                                          | 23        |
| 15.4      | Audit Tables and Compliance Ratings.....               | 23        |
| <b>16</b> | <b>ASSUMPTIONS AND LIMITATIONS .....</b>               | <b>25</b> |
| <b>17</b> | <b>CONSULTATION PROCESS.....</b>                       | <b>25</b> |
| <b>18</b> | <b>FINDINGS .....</b>                                  | <b>26</b> |
| 18.1      | Minor improvements required. ....                      | 26        |
| 18.2      | Major improvements required.....                       | 26        |
| <b>19</b> | <b>AUDIT SUMMARY.....</b>                              | <b>27</b> |
| <b>20</b> | <b>RECOMMENDATIONS .....</b>                           | <b>28</b> |
| <b>21</b> | <b>CONCLUSION.....</b>                                 | <b>28</b> |
|           | <b>ANNEXURE A – CONCERNS/COMPLAINTS REGISTER .....</b> | <b>30</b> |
|           | <b>ANNEXURE B - NCR REGISTER .....</b>                 | <b>30</b> |
|           | <b>ANNEXURE C - INCIDENT REGISTER.....</b>             | <b>31</b> |
|           | <b>ANNEXURE D – PHOTOGRAPHS .....</b>                  | <b>35</b> |
|           | <b>THIS PAGE WAS INTENTIONALLY LEFT BLANK .....</b>    | <b>39</b> |

## TABLE OF FIGURES

|                                                                       |    |
|-----------------------------------------------------------------------|----|
| Figure 1: Erosion caused by pumped water. ....                        | 36 |
| Figure 2: Concrete spillages that must be removed and not buried..... | 36 |
| Figure 3: Birds nest that must be recorded.....                       | 37 |
| Figure 4: Drip tray provided for on the chemical toilet.....          | 37 |
| Figure 5: Excavation that must be barricaded.....                     | 38 |
| Figure 6: Bins provided for along the OHL line. ....                  | 38 |

## ABBREVIATIONS

|             |                                                         |
|-------------|---------------------------------------------------------|
| <b>BAR</b>  | Basic Assessment Report                                 |
| <b>CA</b>   | Competent Authority                                     |
| <b>DEA</b>  | Department of Environmental Affairs (now DFFE)          |
| <b>DFFE</b> | Department of Forestry, Fisheries, and the Environment  |
| <b>DWS</b>  | Department of Water and Sanitation                      |
| <b>EA</b>   | Environmental Authorisation                             |
| <b>EAP</b>  | Environmental Assessment Practitioner                   |
| <b>ECO</b>  | Environmental Control Officer                           |
| <b>EIA</b>  | Environmental Impact Assessment                         |
| <b>EMPr</b> | Environmental Management Programme                      |
| <b>EO</b>   | Environmental Officer (Contractor)                      |
| <b>ER</b>   | Employer's Representative                               |
| <b>ESCO</b> | Environmental Site Compliance Officer                   |
| <b>kV</b>   | Kilovolt                                                |
| <b>MVA</b>  | Megavolt Amperes                                        |
| <b>MW</b>   | Megawatt                                                |
| <b>NCC</b>  | NCC Operations                                          |
| <b>NCR</b>  | Non-Compliance Report                                   |
| <b>NEMA</b> | National Environmental Management Act (No. 107 of 1998) |
| <b>NWA</b>  | National Water Act (No. 36 of 1998)                     |

|             |                                 |
|-------------|---------------------------------|
| <b>OHPL</b> | Overhead Power Line             |
| <b>SDC</b>  | Safe Disposal Certificate       |
| <b>SHE</b>  | Safety, Health, and Environment |
| <b>SS</b>   | Substation                      |
| <b>TBC</b>  | To Be Confirmed                 |

# 1 INTRODUCTION

## 1.1 Background

NCC Operations (Pty) Ltd ("**NCC**") was appointed by URSA Energy (Pty) LTD ("**URSA**") to provide a suitably experienced independent Environmental Control Officer ("**ECO**") for the construction phase of Virginia Solar Park which will be connected to the Eskom Theseus Main Transmission Substation (MTS). The site is located on Farm Blomskraal 216, Ventersburg RD located within the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province. On completion the facility will consist of the Photovoltaic (PV) Power Plant with a maximum generation capacity up to 100 MW, a 132kV powerline connecting the substation to the Eskom Theseus substation which is located 16.2 km North-East of the north-western corner of project site.

The ECO has the responsibility of ensuring the mitigation/ rehabilitation measures and conditions referred to in the Environmental Authorisation ("**EA**") are implemented, as well as ensuring compliance with the requirements of the Environmental Management Programme ("**EMPr**"). This report provides an insight into the overall compliance performance and a summary of other environmental concerns and potential environmental risks through observations during site inspections.

This report is based on the following environmental conditions or requirements:

- a) Environmental Authorisations (EA)
  - 1) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
  - 2) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)
- b) Environmental Management Programmes (EMPr)
- c) Relevant environmental legislation.
- d) All other environmental permits, licenses, and authorisations.

The notification of commencement of construction was submitted to the DFFE for Virginia Solar Plant (Pty) Ltd on the 02 May 2024.

This report addresses conditions set out in the EA which states the ECO as part of their duties: "*The ECO must keep record of all activities on site, problems identified, transgressions noted, and a task schedule of tasks undertaken by the ECO.*" As per the roles and responsibilities in the Virginia Solar Project ("**VSP**") EMPr, the primary role of the ECO will be to monitor the construction activities and ensure that the mitigation measures

of the EMPr and Environmental Authorisations (EA) are implemented. This report also includes an audit checklist for the VSP EA as follows:

- 1) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
- 2) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)

A summary of the various environmental requirements i.e. the audit criteria relating to the overall project is provided in **Table 1**.

**Table 1:** Summary of environmental requirements / criteria relating to the overall project.

| Components of overall project         | Environmental requirements / criteria |               |                                |          |
|---------------------------------------|---------------------------------------|---------------|--------------------------------|----------|
|                                       | DFFE EA Ref No.                       | Issue date    | Approved EMPr<br>(Compiled by) | Date     |
| Virginia Solar Park Switching Station | 14/12/16/3/3/2/2099/2                 | 20 April 2022 | AGES Limpopo (Pty) Ltd         | Jan 2022 |
| Virginia Solar Park OHPL              | 14/12/16/3/3/1/2444                   | 02 Feb 2022   | AGES Limpopo (Pty) Ltd         | Dec 2021 |

This report represents the monitoring for the Construction Phase. The responsibility of enforcement of the conditions of the EAs and EMPrs lies with the Project and Project Manager, while the Department of Forestry, Fisheries, and the Environment ("DFFE") Environmental Management Inspectorate ("EMI") may also enforce existing and potentially new conditions through compliance notices.

An Environmental Site Compliance Officer ("ESCO") has been appointed by the holder of the EA to monitor the project compliance onsite on a full-time basis on behalf of the EA holder. The responsibilities of the ESCO includes:

- Monitoring conditions of the Basic Assessment Reports ("BARs"), Environmental Impact Report (EIR) EAs and the EMPrs.
- Ensuring compliance with all relevant environmental legislation.
- Approving method statements (reviewed by the ECO and co-approved by Site Manager).
- Remaining employed until the completion of the construction activities.
- Reporting to the Project Manager, including all findings identified onsite.
- Reporting any significant findings to the ECO.



- Preparing and submitting monthly reports to the ECO and Project Manager.
- Monitoring compliance by the Contractor.

In addition, the ESCO will:

- Undertake daily inspections of the site and surrounding areas.
- Audit compliance with the EMPr and conditions of the environmental authorisation.
- Take appropriate action if the specifications contained in the EMPr and conditions of the environmental authorisation are not followed.
- Monitor and verify that environmental impacts are kept to a minimum, as far as possible; and
- Ensure that activities onsite comply with all relevant environmental legislation.

## **1.2 Audit Scope and Purpose.**

In accordance with Regulation 34 of the 2014 NEMA EIA Regulations (as amended) the holder of an environmental authorisation must, for the period during which the EA and EMPr, and where applicable the closure plan, remain valid —

- a) Ensure that the compliance with the conditions of the EA and the EMPr, and where applicable the closure plan, is audited; and*
- b) Submit an environmental audit report to the relevant competent authority.*

The purpose of this environmental audit is to verify compliance to the overarching environmental requirements specified as conditions of the EAs and EMPrs, and report on the extent to which the objectives of the EMPrs and are being achieved.

## **1.3 Monitoring Frequency and Reporting.**

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 21<sup>st</sup> of May 2025 after which this report was compiled which serves to document and audit. This report covers the monthly reporting for the month of May 2025.

## 2 AUDITOR BACKGROUND.

NCC is a multi-disciplinary environmental consulting company based in South Africa which adopts a 'values driven' approach with a common purpose to conserve and create sustainable environments that enable people, planet and business to thrive. We are a trusted partner to major engineering and construction firms, mines, parastatals, film, sports and event production companies, municipalities, provincial and national government, and conservation organisations. Drawing on our years of experience on a wide range of projects, NCC works with our clients to develop, implement, and monitor customised services that add real value.

The auditor, Jennipher Sakaunda, is a senior environmental manager with more than 14 years' experience currently employed with NCC. Jennipher Sakaunda has experience in several environmental fields including environmental compliance monitoring and auditing, due diligence assessment, environmental impact and risk assessment, and compilation of environmental management plans/programmes.

**Table 2:** Details of the auditor.

|                       |                                                                                                                                                                                                |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Company</b>        | NCC Operations (Pty) Ltd                                                                                                                                                                       |
| <b>Auditor</b>        | Jennipher Sakaunda                                                                                                                                                                             |
| <b>Tel</b>            | +27 21 702 2884                                                                                                                                                                                |
| <b>Mobile</b>         | +27 69 510 7630                                                                                                                                                                                |
| <b>Email</b>          | <a href="mailto:jenniphers@ncc-group.co.za">jenniphers@ncc-group.co.za</a>                                                                                                                     |
| <b>Address</b>        | 26 Bell Close, Westlake Business Park Westlake, 7945                                                                                                                                           |
| <b>Affiliation</b>    | International Association of Impact Assessment South Africa.<br>Environmental Assessment Practitioner Association of South Africa.<br>South African Council of Natural Scientific Professions. |
| <b>Qualifications</b> | BSc (honors) Environmental Management                                                                                                                                                          |
| <b>Expertise</b>      | A detailed CV can be provided on request.                                                                                                                                                      |

### 3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (May 2025) included the following:

- Site establishment for the offsite laydown area.
- Excavation of monopole foundations.
- Cast blinding slab and steel fixing at the OHL.
- Earth mat installation works at the switching station area.
- Construction of the internal road connecting the access road to the Temporary Site Offices (TSF) and Switching Station.
- Fencing.
- Reworking of the rain damaged portions of the access road.
- Construction of the temporary stormwater berm.
- Site Establishment.

#### 3.1 General Outstanding matters

Any major outstanding matters are to be recorded and summarised in the Concerns Register (**Annexure A**). The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

#### 3.2 Audits (Internal and External)

Internal audits are undertaken monthly by the Red Rocket ESCO. This ECO Audit was undertaken on the 21<sup>st</sup> of May 2025. Audit tables/checklists are attached to this report. The ECO undertakes external monthly audits.

## 4 WASTE MANAGEMENT

The contractor must make provision for waste avoidance, minimisation, and separation of waste where possible through recycling efforts. Waste management awareness must be done on an ongoing basis and must be provided through toolbox talks and awareness posters. The EMPr requires waste to be recycled. To ensure compliance the contractor has put out an RFQ to secure a service provider. The contractor is busy with selecting a service provide who will recycle waste onsite.

### 4.1 Domestic/ General Waste

Approximately **377kg** of general waste a was removed from site in the month of May 2025. Waste bins are placed along the OHL line where each team will be working, at the end of the day waste is collected and placed at the laydown areas for temporary storage. Designated waste areas have been provided at the contractors' main site offices/laydown areas for purposes of temporary storage of waste prior to collection and transferal to the licensed waste facilities. Bins at the laydown area are colour coded for each waste type. No waste material from the site was recycled this month. Cleared alien vegetation is temporary stockpiled onsite before being disposed of at a registered licensed landfill.

The service providers dispose the general waste at Matjhabeng Local Municipality waste disposal site-Licence number: B33/2/340/21/P8 16/2/7/C404/D2/Z1/P367. Proof of disposal is available on request.

### 4.2 Hazardous waste

Hazardous waste skips are available at the dedicated waste storage area at each of the sub-contractors' site offices/lay down areas. Approximately **11 890 kg** of hazardous waste was disposed of in May 2025 at Vlakfontein which is a registered hazardous landfill site. Hazardous waste in form of oil spillages, cement spillages and contaminated soil is kept onsite until there is enough to dispose. Several spillages have been recorded on site, this is concerning. To reduce the number of spillages the ESCO together with the contractors Environmental Officer must re-train workers on spillages, ensure al vehicles are serviced and only road worthy are allowed onsite.

### 4.3 Wastewater

Approximately **9 710.5 L** of sewerage waste was generated on site in the month of May 2025. Chemical toilets and a conservancy tank have been provided onsite. The General Authorisation that was issued by DWS for the includes the use of a conservancy tank up to a capacity of 50 000l. The conservancy tank onsite has a capacity

of 12 500l which is below the stipulated GA threshold. The contractor must ensure that this capacity is not exceeded.

The Appointed Service Provider removes sewage and dispose of it at Matjhabeng Local Municipality wastewater treatment facility - Licence No: 10/D4/J/G/2082. Proof of disposal is available onsite. The contractor must ensure the appointed service provider is licenced to provide sewer removal services. Additionally, adequate ablution facilities must be always provided.

## 5 PROTECTIVE MEASURES

### 5.1 General

Protective measures have been deployed to mitigate environmental impacts or prevent impacts from occurring which includes:

- Security guards are present on the site, with access control in place.
- Induction training is conducted for all persons working and visiting the site.
- Snake gaiters are provided.
- Spill kits.
- No-go areas are demarcated and provided with signage.
- Access cards
- Rapid alcohol detecting

## 6 ENVIRONMENTAL CONSERVATION

### 6.1 Conservation of Flora and Fauna

A permit to clear the site and relocate species of concern was received from the Free state Department of Economic, Small Business Development, Tourism and Environmental Affairs. The permit with Ref No. 202306000012649 was issued on 08/06/2023 to pluck protected and unprotected flora.

Clearance of alien vegetation has commenced; the contactor must monitor the cleared areas to ensure alien vegetation does not re-establish. All cleared alien vegetation must be disposed at the Matjhabeng Local Municipality waste disposal site.

Several trees not located within the area of the OHL have birds' nest located in them, these nests must be recorded, and the trees must be avoided.

### 6.2 Water Management

Approximately **460 m<sup>3</sup>** of water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The GA allows for abstraction of 43 000m<sup>3</sup> annually, the contactor must ensure water abstraction does not exceed the licenced volumes.

### 6.3 Soil Management

Cleared topsoil has been stockpiled along the OHL line and the switching station. These must be protected from erosion and alien vegetation establishment. Alien vegetation has established on the stockpiles and must be cleared. Excavated material was placed in a wetland on Tower No: 13. The contractor must wait for the wetland to dry before removing the material. Water that was pumped out of Tower No: 13 pit caused erosion of the area; the area must be rehabilitated. Topsoil and subsoil from the excavation of must be stored separately.

### 6.4 Stormwater and Erosion onsite

The contractor's Stormwater Management Plan was approved, measures to manage erosion as per the approved SWMP have been implemented to prevent erosion and water ponding. More drains have been opened to prevent water ponding, and berms have been placed on the access roads to prevent them from being eroded. Measures diverted clean stormwater away from the works towards the watercourses must be implemented.

## **7 INFRASTRUCTURE MANAGEMENT**

### **7.1 Access Roads**

The project team is using existing farm roads for current construction activities until such time as the project access roads and internal roads have been constructed. Berms have been added to the access roads to prevent erosion. The existing access roads must be maintained to address the effects water ponding and erosion.

### **7.2 Fences, Gates, and Barricading**

The site is fenced with security personnel manning the gates. Access cards are used to allow entrance to site. Barricading was observed on site, and such should continue to be maintained around all open excavations along the OHPL servitudes to prevent potential fauna (wildlife and livestock) incidents. Old farm fences that have been removed, should they not be used they must be disposed of properly.

### **7.3 Buildings and Structures**

Containers have been established on site by various subcontractors that are being used as offices. Male and female ablation facilities have been provided. Chemical toilets and a conservancy tank are used to manage sewer onsite.

## **8 SOCIAL RESPONSIBILITY**

Any complaints from the public are to be recorded on complaints register maintained by the Contractor whose responsibility it is to track and resolve the complaints/issues that are raised. In addition, a box for receiving internal grievances is present at the main site office facility which allows for project staff to bring to the attention of the project management team any comments and or concerns.

## 9 ENVIRONMENTAL AWARENESS AND TRAINING

The contractor has undertaken Toolbox talks for the month of May 2025 covering the following topics:

- Cement and Concrete
- Spill Control
- Reporting Environmental hazards
- Pumping and water contamination
- Chance finds
- Housekeeping
- Chemical Safety
- Noise Pollution
- Pumping of water out of excavations.
- Hazardous Waste.
- Housekeeping
- Fire Extinguisher
- Dust and Air Quality
- Waste Management
- Importance of vehicle maintenance
- Using of spill kit
- Snake Awareness



## 10 HERITAGE

In the event of any unknown artefacts being uncovered during construction, the ESCO and Project Manager must be informed immediately who must then instruct work to be stopped in the immediate area and then promptly report the discovery/finding to the ECO, a heritage specialist and the relevant heritage authority to investigate and confirm if such discovery is in fact a heritage artefact of any significance. No activities impacting upon any heritage sites were reported during this reporting period.

## 11 WARNING & NCRS

No NCR reports were issued by the ECO in the month of May.

## 12 REHABILITATION

No rehabilitation works have commenced during this period, further rehabilitation is expected to occur on the project as and when other works have been completed.

## 13 INCIDENTS AND ACCIDENTS

All environmental related events, incidents and accidents are to be reported directly to the ECO and kept on a central register and included in the monthly report. No environmental incidents that occurred in May. A register of environmental incidents is attached as **Annexure C**.

## 14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 21<sup>st</sup> of May 2025 with observations documented in this report. Monthly ECO compliance reports are submitted to the Department (DFFE) by the ECO.

## 15 AUDIT METHODOLOGY

This section provides an overview of the methods employed in making observations and providing recommendations and conclusions derived from the audit procedures undertaken.

### 15.1 Audit Process

The site visit, data reviews and report drafting were undertaken by the ECO/auditor. The audit included the following procedures:

- **Site Inspections.** The areas and aspects covered during the inspections with concurrent discussions with the ESCO and site-based representatives of the EA holder included *inter alia*:
  - i. Access control to the sites.
  - ii. Ecologically sensitive areas, where applicable.
  - iii. Waste management.
  - iv. Incident and complaints management.
  - v. Landowner relations.
  - vi. Infrastructure management.
  - vii. Environmental Awareness.
  - viii. Record-keeping and document control.
  - ix. Stormwater and Erosion management
- **Documentation review.** This included:
  - i. A review of the EAs, EMPs and where applicable, method statements.
  - ii. A review of previous audit reports, records, observations, and findings.
  - iii. A review of any remedial and/or protective measures implemented.
  - iv. Identification, if applicable, any gaps requiring action and/or rectification.
- **Audit Report compilation.** This included:
  - i. Recording any observations and findings identified during the audit.
  - ii. Providing recommendations relating to improvement or non-compliance, if and where applicable.

## 15.2 Observation and Recommendation Determination

Observations and subsequent recommendations were based on and are limited to the following:

- i. Available documentation and records viewed or received prior, subsequent, or during the site visit.
- ii. Observations made during the period that the ECO/auditor was on site; and
- iii. Information received from both direct and cross-referenced discussions with permanent site-based staff.

## 15.3 Findings

Any key findings highlighted in this report will indicate areas and/or aspects that require improvement or rectification. The purpose of summarising the findings is to allow the EA holder to identify common management challenges that effect the level of compliance to the conditions of the EAs and EMPs.

Where findings and recommendations pertaining are deemed significant through compliance status or performance, they are documented as specific issues in the report. All site-specific observations are recorded in the corresponding audit checklist tables.

## 15.4 Audit Tables and Compliance Ratings

The audit table captures observations and recommendations made in relation to the conditions stipulated in the EAs and EMPs. It provides the reader with more detailed information in terms of what the stipulated requirements are in relation to the organisation's assessed current compliance status, according to the observations recorded by the auditor.

Ratings are calculated based on a scoring system whereby each auditable condition is provided with a score as highlighted in **Table 3** below.

**Table 4:** Compliance rating and scoring.

| Status                              | Compliance Rating |         | Description                                                                                                                                                                                |
|-------------------------------------|-------------------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | Abbreviation      | Scoring |                                                                                                                                                                                            |
| <i>Compliant</i>                    | C                 | 2       | <i>No improvements required</i>                                                                                                                                                            |
| <i>Partially Compliant</i>          | PC                | 1       | <i>Minor improvements required</i>                                                                                                                                                         |
| <i>Non-Compliant</i>                | NC                | 0       | <i>Major improvements required</i>                                                                                                                                                         |
| <i>Work in Progress</i>             | WiP               | -       | <i>Environmental management measures are underway but not yet fully implemented or verified, requiring further monitoring and assessment.</i>                                              |
| <i>Not Applicable / Not Audited</i> | NA                | -       | <i>No improvements required and / or the condition is either not, not yet or no longer relevant at the time of the audit</i>                                                               |
| <i>Informative</i>                  | info              | -       | <i>These relate to informative elements that provide either useful information or are descriptive in the explanation and understanding of statements or concepts in the audit criteria</i> |

Each condition has been ascribed a colour-coded status indicator of Compliant (green), Partially Compliant (orange), major-compliant (red), Not Auditable/Audited (grey), Work in Progress (light red) and Informative (blank/white) to assist the reader in determining aspects that require attention to improve on compliance achieved, if and where applicable. No compliance scoring is attributed any of the audit criteria information pertaining to the following three audit status symbols, namely 'NA', 'WiP', and 'info' as they were either not auditable and/or were not applicable/relevant at the time the audit was undertaken. In other words, they are excluded from the overall compliance rating calculations.

An overall compliance rating is calculated as a percentage to provide the reader with an overview of compliance to the relevant audit criteria however each condition should be considered on its own merits as the ratings do not necessarily portray the severity or impact of the reported finding relating to a condition.

## 16 ASSUMPTIONS AND LIMITATIONS

The ECO compliance audit and associated report are based upon the assumptions that:

- i. Documentation provided to the ECO/auditor is factual and true.
- ii. The audit is based purely on the conditions as stipulated in the EAs and EMPs.
- iii. The construction phase is currently underway and operational phase activities are not applicable.
- iv. Documentation / reports were randomly sampled / reviewed in order to accommodate time constraints.
- v. Where visual observations were not possible either due to physical access constraints or safety constraints, the ECO/auditor used other means to determine compliance, either through requesting written evidence provided by contractors / service providers who service the site or via interviews with technical site-based staff.

## 17 CONSULTATION PROCESS

The approach of consultation followed during the environmental audit was based on written (email) and telephonic correspondence between the ECO/auditor and the Environmental Site Compliance Officer which also includes consultation and communication with the EA holder and competent authority in terms of report submission.

## 18 FINDINGS

Findings are listed in the attached checklists, and it should be noted that findings should be considered individually in the context of the full audit and each condition and associated rating.

The following findings were noted onsite:

- Clearance of alien vegetation is on-going.
- Water pumped from the tower pit caused erosion on the wetland area.
- Stormwater measures are being implemented.
- Alien vegetation observed on stockpiles.
- Waste is not recycled.
- Some excavated pits had no sign.

Based on the outcomes of the audit it was established that the objectives of the EAs and EMPs were achieved in terms of:

- i. *Sufficiently providing for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis.*
- ii. *Ensuring compliance with the provisions of environmental authorisation and EMP.*

### 18.1 Minor improvements required.

- Waste recycling must be done onsite.

### 18.2 Major improvements required.

- Maintenance of access roads.
- Clearance of all alien vegetation including on stockpiles.
- Repairing erosion on the wetland.

## 19 AUDIT SUMMARY

In terms of the findings and results of the **May 2025** ECO audit, the project achieved an overall **98%** compliance rating with the conditions of the EAs and EMPs.

Table 4: Compliance Scoring

| No.                                       | Audit criteria                                                                                             | Compliant (C) | Partially Compliant (PC) | Major-non-Compliant (NC) | Work in Progress | Normative (info) | Not Applicable / Not Audited (NA) | Percentage Score      |
|-------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------|--------------------------|--------------------------|------------------|------------------|-----------------------------------|-----------------------|
| 1                                         | Environmental Authorisation for Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)                | 23            | 1                        | 0                        | 1                | 18               | 3                                 | (98%)                 |
| 2                                         | Environmental Authorisation for Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2) | 25            | 1                        | 0                        | 1                | 19               | 3                                 | (98%)                 |
| 3                                         | EMPr Virginia Solar Park OHPL (DFFE REF NO: 14/12/16/3/3/1/2444)                                           | 212           | 6                        | 1                        | 0                | 51               | 58                                | (98%)                 |
| 4                                         | EMPr Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2)                            | 172           | 2                        | 1                        | 0                | 22               | 30                                | (99%)                 |
| Overall total no. conditions              |                                                                                                            | 432           | 10                       | 2                        | 2                | 110              | 94                                |                       |
| Audited conditions                        |                                                                                                            | 864           | 53                       | 0                        | 0                | -                | -                                 | (Potential max score) |
| Overall Compliance Rating Calculation (%) |                                                                                                            | 98%           |                          |                          |                  |                  |                                   |                       |



## 20 RECOMMENDATIONS

**Based on the findings identified the following is recommended:**

- The contractor must wait for a drier season to remove material placed in the wetland area.
- Erosion caused by pumping water from the tower pit onto the wetlands must be repaired.
- Waste must be recycled onsite.
- Alien vegetation clearance must continue onsite, and the contractor must monitor the cleared areas to prevent reestablishment of alien vegetation.
- All excavation must be fitted with signs.
- Trees with nests must be recorded.
- All trenches must be barricaded at the end of each working day.

## 21 CONCLUSION

The contractor must ensure that systems and resources to monitor and manage environmental risks and impacts adequately are in place. Resources and personnel to train employees on the contents of the EMPs must be made to ensure that the project runs effectively and efficiently with minimal impact to the biophysical and socio-economic environment.

In general, the EMPs are effective in their current format in terms of content and relevance and there are no major shortcomings. The EMP's sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with this project.

**PREPARED BY:**

A handwritten signature in black ink, appearing to read 'Sakaunda'.

**Sakaunda Jennipher**

Environmental Control Officer

NCC Operations (Pty) Ltd

**M** ·069 510 7630

**E** · [jenniphers@ncc-group.co.za](mailto:jenniphers@ncc-group.co.za)

**REVIEWED BY:**

A handwritten signature in black ink, appearing to read 'Nick'.

**Nick Gates**

Senior Environmental Consultant

NCC Operations (Pty) Ltd

**M** ·073 1998 431

**E** ·[nickg@ncc-group.co.za](mailto:nickg@ncc-group.co.za)

## ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

### Open Concerns/Complaint

| No | Observation date | Concern/Complaint | Suggested Due Date <sup>1</sup> | Proposed Corrective Action | Status | Closure status |
|----|------------------|-------------------|---------------------------------|----------------------------|--------|----------------|
|    |                  |                   |                                 |                            |        |                |

*\*The concerns register is updated once the ECO is present on site.*

### Closed Concerns

| No | Observation date | Concern/Complaint | Due Date suggested by ECO | Corrective Action Taken | Outcome | Closure status |
|----|------------------|-------------------|---------------------------|-------------------------|---------|----------------|
|    |                  |                   |                           |                         |         |                |
|    |                  |                   |                           |                         |         |                |

## ANNEXURE B - NCR REGISTER

| Ref No. | Originator | Dated Issued | Description | Proposed Corrective Action | Closure Status | Closure Date | Further Action Required |
|---------|------------|--------------|-------------|----------------------------|----------------|--------------|-------------------------|
|         |            |              |             |                            |                |              |                         |

## ANNEXURE C - INCIDENT REGISTER

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                   | Volume                                       | Remedial Action                                              |                                                                               |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|--------------------------------------------------------------|-------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                |                                              | Immediate Corrective Actions                                 | Preventative measures                                                         |
| 20/03/2025 | Waste water                                                                      | Soil pollution                                                             | O20, 2025, at approximately 8:28, the conservative tank being used to collect wastewater from conservancy tank had overfilled, and a Spillage had occurred spillage of approximately 8-10 litres of wastewater mixed with the cleaning material. the toilet supplier attended to the spill immediate & initiated spill Clean-up. Contaminated soil was taken to the hazardous waste skip. | 10 l ( below the NEMA Section 30 threshold). | Clean- up must be done as soon as the spills are identified  | The conservancy tank must be emptied more frequently to reduce overfilling.   |
| 19/03/2025 | Waste water                                                                      | Soil pollution                                                             | Approximately 12 litres of wastewater mixed with the cleaning chemicals where toilets are located. The toilet had been leaking since the previous day and wastewater was contained in a drip tray. The toilet supplier was notified, and he came to service The toilets; however, during servicing; the drip tray spilled over causing the spillage of the wastewater onto the ground.    | 12l ( below the NEMA Section 30 threshold).  | Clean- up must be done as soon as the spills are identified. | Leaking toilets must not be allowed onsite.                                   |
| 08/03/2025 | Diesel spillage                                                                  | Soil pollution                                                             | On 08 March 2025 at 05:30, security supervisor discovered a diesel leakage during the morning patrol. The spillage occurred due to the diesel injectors that were                                                                                                                                                                                                                         | 20l ( below the NEMA Section 30              | Clean- up must be done as soon as the spills are identified  | Vehicles must be maintained regular only road worthy vehicles must be onsite. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                 | Volume                                          | Remedial Action                                             |                                                                               |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|-------------------------------------------------------------|-------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                              |                                                 | Immediate Corrective Actions                                | Preventative measures                                                         |
|            |                                                                                  |                                                                            | loose one of them was not properly fitted and diesel pressure removed them while the bakkie was in motion.                                                                                                                                                                                                                                                              | <i>threshold</i>                                |                                                             |                                                                               |
| 07/03/2025 | Water and antifreeze                                                             | Soil pollution                                                             | The Driver parked the minibus on site, shortly a leak observed containing a mixture of water and antifreeze, while also exhibiting signs of overheating.                                                                                                                                                                                                                | -                                               | Clean- up must be done as soon as the spills are identified | Vehicles must be maintained regular only road worthy vehicles must be onsite. |
| 06/05/2025 | Water mixed with antifreeze spillage                                             | Soil pollution                                                             | On 6 May 2025 at 14:00, the TLB Operator was busy moving spoil material near the access road to the allocated spoil Stockpile area, when the TLB, radiator fan belt snapped & the container that stores water & antifreeze busted. Approximately 5 Liters of water with antifreeze spilled.                                                                             | 5 litres (below the NEMA Section 30 threshold). | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.                 |
| 08/05/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | A chemical toilet in PV3 at the laydown area at around 3:53 pm, 08 May 2025 was reported to be leaking, when the toilet was assessed, it was identified that there was a broken pipe that leaked the chemical water. An immediate action was taken to clean up the spillage. The contaminated soil was collected into the bags and taken to site waste management area. | 6 litres (below the NEMA Section 30 threshold). | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent.        |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                   | Volume                                                    | Remedial Action                                             |                                                                        |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                |                                                           | Immediate Corrective Actions                                | Preventative measures                                                  |
| 12/05/2025 | Diesel spillage                                                                  | Soil pollution                                                             | On 12-05-2025 at 06:40, the ambulance was on the way to the access control point along the main access road, when it had a sudden breakdown and diesel was spilled along the access road, leaving a trail of diesel spill for approximately +400 Metres. Approximately +2 Litres of diesel was spilled                                                                                                                                                    | 2 litres ( <i>below the NEMA Section 30 threshold</i> d). | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.          |
| 15/05/2025 | Hydraulic oil spillage                                                           | Soil pollution                                                             | On the 15/05/2025, a side tipper truck was transporting spoil material when the cylinder failed and spilled ~7 litres of hydraulic oil, about 455m from the nearest watercourse. The contaminated soil was promptly cleaned up.                                                                                                                                                                                                                           | 7 litres ( <i>below the NEMA Section 30 threshold</i> d). | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.          |
| 20/05/2025 | Toilet Cleaner mixed with water spillage                                         | soil pollution                                                             | It was around 11:30 am when it was reported that there was a spillage, that when the Fidamo team was about to clean the toilets at Pv1 Laydown area, a pipe from the generator busted and the water leaked from the broken pipe. The water that spilled was approximately 3-4 Liters and the pipe was immediately stopped. The chemical that was in the water is blue splash Toilet chemical. An immediate action was taken to clean up the spillage. The | 4 litres ( <i>below the NEMA Section 30 threshold</i> d). | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                     | Volume                                           | Remedial Action                                              |                                                                                 |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|--------------------------------------------------------------|---------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                  |                                                  | Immediate Corrective Actions                                 | Preventative measures                                                           |
|            |                                                                                  |                                                                            | contaminated soil was collected into the bags and taken to site waste management area.                                                                                                                                                                                                                                                                                                                                      |                                                  |                                                              |                                                                                 |
| 21/05/2025 | Fauna                                                                            | Loss of biodiversity                                                       | On the 21/05/2025 a snake was fatally wounded during the internal road construction works.                                                                                                                                                                                                                                                                                                                                  | N/A                                              | The dead animal was buried.                                  | N/A                                                                             |
| 26/05/2025 | Hydraulic oil spillage                                                           | Soil pollution                                                             | on the 26/05/2025, at around 16:50 a drill rig operator noticed a leak from the machine, he immediately reported the leak to the supervisor. The supervisor called the mechanic but did not report the spillage. The oil further spilled to the soil during the repair attempts which were done under poor lighting. The spillage was left overnight and was only reported to the EO the next morning when the shift began. | 25 litres (below the NEMA Section 30 threshold). | Clean- up must be done as soon as the spills are identified. | An NCR must be issued subcontractor for failing to report spillage immediately. |

## **ANNEXURE D – PHOTOGRAPHS**





**Figure 1:** Erosion caused by pumped water.



**Figure 2:** Concrete spillages that must be removed and not buried.



**Figure 3:** Birds nest that must be recorded.



**Figure 4:** Drip tray provided for on the chemical toilet.





**Figure 5:** Excavation that must be barricaded.



**Figure 6:** Bins provided for along the OHL line.

**THIS PAGE WAS INTENTIONALLY LEFT BLANK**



---

# ECO MONTHLY ENVIRONMENTAL MONITORING REPORT

Virginia Photo Voltaic (PV) Solar Facility 1, 2 and 3,  
Matjhabeng, Lejweleputswa District Municipality within  
the jurisdiction of the Free State Province.

---

**PREPARED FOR:**

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

Department of Forestry, Fisheries, and the Environment: Compliance Monitoring

**DATED:**

May 2025

**PREPARED BY:**

NCC Operations

**T** • 021 702 2884

**E** • [info@ncc-group.co.za](mailto:info@ncc-group.co.za)

## DECLARATION OF INDEPENDENCE

I, Jennipher Sakaunda, as duly authorised representative of NCC Operations (Pty) Ltd ("**NCC**"), hereby confirm my independence (as well as that of NCC) as an auditor and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which URSA Energy (Pty) Ltd has appointed NCC as Environmental Control Officer ("**ECO**"), other than fair remuneration for work performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'Sakaunda', is positioned below the 'Signed:' text.

**Jennipher Sakaunda**

03 June 2025

Environmental Control Officer

NCC Operations (Pty) Ltd

## **LIABILITY DISCLAIMER AND CONFIDENTIALITY CLAUSE**

All inspections conducted, as well as reports and recommendations provided by NCC are purely advisory. They are primarily intended for the purpose of assisting clients in loss control, risk management as well as health, safety, and environmental procedures.

Observations and recommendations are the result of practices and conditions observed, and information made available to us in various forms at the time of our visit. They do not purport to refer to or guarantee compliance with local or government regulations which may be applicable to such practices and conditions. This report should not be considered a definitive listing of all existing risks nor an absolute solution to all indicated risks, or hazards present from time to time in the Client Organisation. The report should always be considered in its entirety; individual sentences, paragraphs or sections of the report should not be used in isolation.

This report should not be reproduced except in its entirety, including this liability disclaimer or contents reproduced or disclosed to any third party without the prior written approval of NCC.

NCC assumes no responsibility for any losses incurred as a result of the implementation, management, and operation of recommended health, safety and environmental systems, processes and procedures.

## DOCUMENT CONTROL

|                     |                                             |
|---------------------|---------------------------------------------|
| <b>REPORT TITLE</b> | Monthly ECO Environmental Monitoring Report |
| <b>PROJECT</b>      | Virginia Solar PV 1, 2, 3                   |
| <b>LOCATION</b>     | Free State Province                         |
| <b>EA HOLDER</b>    | URSA Energy (Pty) Ltd                       |
| <b>ECO</b>          | NCC Operations (Pty) Ltd                    |
| <b>REVISION</b>     | 00                                          |
| <b>DATE</b>         | 03/06/2025                                  |

| Revision | Date       | Description                  |
|----------|------------|------------------------------|
| Rev 00   | 04/06/2025 | First Draft - Internal       |
| Rev 01   | TBC        | Final - Authority submission |

## REPORT DISTRIBUTION LIST

| Name                   | Organisation                      | Issued     | Format     |
|------------------------|-----------------------------------|------------|------------|
| Janine Brasington      | Red Rocket South Africa (Pty) Ltd | 04/06/2025 | Electronic |
| Serina Pillay          | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Maggie Logan           | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Director of Compliance | DFFE                              | TBC        | Electronic |



## TABLE OF CONTENTS

|                                                    |           |
|----------------------------------------------------|-----------|
| <b>TABLE OF FIGURES .....</b>                      | <b>7</b>  |
| <b>ABBREVIATIONS .....</b>                         | <b>8</b>  |
| <b>1 INTRODUCTION .....</b>                        | <b>10</b> |
| 1.1 Background.....                                | 10        |
| 1.2 Audit Scope and Purpose.....                   | 12        |
| 1.3 Monitoring Frequency and Reporting.....        | 12        |
| <b>2 AUDITOR BACKGROUND. ....</b>                  | <b>13</b> |
| <b>3 GENERAL (NOTABLE EVENTS) .....</b>            | <b>14</b> |
| 3.1 General Outstanding matters.....               | 14        |
| 3.2 Audits (Internal and External).....            | 14        |
| <b>4 WASTE MANAGEMENT.....</b>                     | <b>15</b> |
| 4.1 Domestic/ General Waste.....                   | 15        |
| 4.2 Hazardous waste.....                           | 15        |
| 4.3 Wastewater .....                               | 15        |
| <b>5 PROTECTIVE MEASURES .....</b>                 | <b>16</b> |
| 5.1 General .....                                  | 16        |
| <b>6 ENVIRONMENTAL CONSERVATION.....</b>           | <b>17</b> |
| 6.1 Conservation of Flora and Fauna.....           | 17        |
| 6.2 Water Management.....                          | 17        |
| 6.3 Soil Management .....                          | 17        |
| 6.4 Stormwater and Erosion onsite .....            | 17        |
| <b>7 INFRASTRUCTURE MANAGEMENT.....</b>            | <b>18</b> |
| 7.1 Access Roads.....                              | 18        |
| 7.2 Fences, Gates, and Barricading .....           | 18        |
| 7.3 Buildings and Structures .....                 | 18        |
| <b>8 SOCIAL RESPONSIBILITY.....</b>                | <b>18</b> |
| <b>9 ENVIRONMENTAL AWARENESS AND TRAINING.....</b> | <b>19</b> |
| <b>10 HERITAGE.....</b>                            | <b>19</b> |
| <b>11 WARNING &amp; NCRS.....</b>                  | <b>20</b> |

|           |                                                        |           |
|-----------|--------------------------------------------------------|-----------|
| <b>12</b> | <b>REHABILITATION .....</b>                            | <b>20</b> |
| <b>13</b> | <b>INCIDENTS AND ACCIDENTS .....</b>                   | <b>20</b> |
| <b>14</b> | <b>MEETINGS AND OTHER CORRESPONDANCE.....</b>          | <b>20</b> |
| <b>15</b> | <b>AUDIT METHODOLOGY.....</b>                          | <b>21</b> |
| 15.1      | Audit Process.....                                     | 21        |
| 15.2      | Observation and Recommendation Determination.....      | 22        |
| 15.3      | Findings.....                                          | 22        |
| 15.4      | Audit Tables and Compliance Ratings .....              | 22        |
| <b>16</b> | <b>ASSUMPTIONS AND LIMITATIONS .....</b>               | <b>24</b> |
| <b>17</b> | <b>CONSULTATION PROCESS.....</b>                       | <b>24</b> |
| <b>18</b> | <b>FINDINGS .....</b>                                  | <b>25</b> |
| 18.1      | Minor improvements required. ....                      | 25        |
| 18.2      | Major improvements required.....                       | 25        |
| <b>19</b> | <b>AUDIT SUMMARY.....</b>                              | <b>25</b> |
| <b>20</b> | <b>RECOMMENDATIONS .....</b>                           | <b>27</b> |
| <b>21</b> | <b>CONCLUSION.....</b>                                 | <b>27</b> |
|           | <b>ANNEXURE A – CONCERNS/COMPLAINTS REGISTER .....</b> | <b>29</b> |
|           | <b>ANNEXURE B - NCR REGISTER .....</b>                 | <b>29</b> |
|           | <b>ANNEXURE C - INCIDENT REGISTER.....</b>             | <b>30</b> |
|           | <b>ANNEXURE D – PHOTOGRAPHS .....</b>                  | <b>34</b> |
|           | <b>THIS PAGE WAS INTENTIONALLY LEFT BLANK .....</b>    | <b>39</b> |

## TABLE OF FIGURES

|                                                                       |    |
|-----------------------------------------------------------------------|----|
| Figure 1: Chemical bund onsite.....                                   | 35 |
| Figure 2: Stockpile exceeding 2m in height.....                       | 35 |
| Figure 3: Concrete spillages that must be removed and not buried..... | 36 |
| Figure 4: Old fences that must be removed. ....                       | 36 |
| Figure 5: Cleared trees should be donated.....                        | 37 |
| Figure 6: Alien vegetation on stockpiles .....                        | 37 |
| Figure 7: Clean toilets.....                                          | 38 |
| Figure 8: On-going clearance of alien vegetation. ....                | 38 |

## ABBREVIATIONS

|             |                                                         |
|-------------|---------------------------------------------------------|
| <b>BAR</b>  | Basic Assessment Report                                 |
| <b>CA</b>   | Competent Authority                                     |
| <b>DEA</b>  | Department of Environmental Affairs (now DFFE)          |
| <b>DFFE</b> | Department of Forestry, Fisheries, and the Environment  |
| <b>DWS</b>  | Department of Water and Sanitation                      |
| <b>EA</b>   | Environmental Authorisation                             |
| <b>EAP</b>  | Environmental Assessment Practitioner                   |
| <b>ECO</b>  | Environmental Control Officer                           |
| <b>EIA</b>  | Environmental Impact Assessment                         |
| <b>EMPr</b> | Environmental Management Programme                      |
| <b>EO</b>   | Environmental Officer (Contractor)                      |
| <b>ER</b>   | Employer's Representative                               |
| <b>ESCO</b> | Environmental Site Compliance Officer                   |
| <b>kV</b>   | Kilovolt                                                |
| <b>MVA</b>  | Megavolt Amperes                                        |
| <b>MW</b>   | Megawatt                                                |
| <b>NCC</b>  | NCC Operations                                          |
| <b>NCR</b>  | Non-Compliance Report                                   |
| <b>NEMA</b> | National Environmental Management Act (No. 107 of 1998) |
| <b>NWA</b>  | National Water Act (No. 36 of 1998)                     |

|             |                                 |
|-------------|---------------------------------|
| <b>OHPL</b> | Overhead Power Line             |
| <b>SDC</b>  | Safe Disposal Certificate       |
| <b>SHE</b>  | Safety, Health, and Environment |
| <b>SS</b>   | Substation                      |
| <b>TBC</b>  | To Be Confirmed                 |

# 1 INTRODUCTION

## 1.1 Background

NCC Operations (Pty) Ltd ("**NCC**") was appointed by URSA Energy (Pty) LTD ("**URSA**") to provide a suitably experienced independent Environmental Control Officer ("**ECO**") for the construction phase of Virginia Solar Park which will be connected to the Eskom Theseus Main Transmission Substation (MTS). The site is located on Farm Blomskraal 216, Ventersburg RD located within the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province. On completion the facility will consist of the Photovoltaic (PV) Power Plant with a maximum generation capacity up to 100 MW, a 132kV powerline connecting the substation to the Eskom Theseus substation which is located 16.2 km North-East of the north-western corner of project site.

The ECO has the responsibility of ensuring the mitigation/ rehabilitation measures and conditions referred to in the Environmental Authorisation ("**EA**") are implemented, as well as ensuring compliance with the requirements of the Environmental Management Programme ("**EMPr**"). This report provides an insight into the overall compliance performance and a summary of other environmental concerns and potential environmental risks through observations during site inspections.

This report is based on the following environmental conditions or requirements:

- a) Environmental Authorisations (EA)
  - 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
  - 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
  - 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)
- b) Environmental Management Programmes (EMPr)
- c) Relevant environmental legislation.
- d) All other environmental permits, licenses, and authorisations.

The notification of commencement of construction was submitted to the DFFE for Virginia Solar Plant (Pty) Ltd on the 02 May 2024.

This report addresses conditions set out in the EA which states the ECO as part of their duties: *"The ECO must keep record of all activities on site, problems identified, transgressions noted, and a task schedule of tasks undertaken by the ECO."* As per the roles and responsibilities in the Virginia Solar Project ("**VSP**") EMPr, the primary role of the ECO will be to monitor the construction activities and ensure that the mitigation measures

of the EMPr and Environmental Authorisations (EA) are implemented. This report also includes an audit checklist for the VSP EA as follows:

- 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
- 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
- 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)

A summary of the various environmental requirements i.e. the audit criteria relating to the overall project is provided in **Table 1**.

**Table 1:** Summary of environmental requirements / criteria relating to the overall project.

| Components of overall project | Environmental requirements / criteria |               |                                |          |
|-------------------------------|---------------------------------------|---------------|--------------------------------|----------|
|                               | DFFE EA Ref No.                       | Issue date    | Approved EMPr<br>(Compiled by) | Date     |
| Virginia 1 Solar Park         | 14/12/16/3/3/2/2099/1                 | 20 April 2022 | AGES Limpopo (Pty) Ltd         | Jan 2022 |
| Virginia 2 Solar Park         | 14/12/16/3/3/2/2100                   | 20 May 2022   | AGES Limpopo (Pty) Ltd         | Jan 2022 |
| Virginia 3 Solar Park         | 14/12/16/3/3/2/2101                   | 20 April 2022 | AGES Limpopo (Pty) Ltd         | Feb 2022 |

This report represents the monitoring for the Construction Phase. The responsibility of enforcement of the conditions of the EAs and EMPrs lies with the Project and Project Manager, while the Department of Forestry, Fisheries, and the Environment (“**DFFE**”) Environmental Management Inspectorate (“**EMI**”) may also enforce existing and potentially new conditions through compliance notices.

An Environmental Site Compliance Officer (“**ESCO**”) has been appointed by the holder of the EA to monitor the project compliance onsite on a full-time basis on behalf of the EA holder. The responsibilities of the ESCO includes:

- Monitoring conditions of the Basic Assessment Reports (“**BARs**”), Environmental Impact Report (**EIR**) EAs and the EMPrs.
- Ensuring compliance with all relevant environmental legislation.

- Approving method statements (reviewed by the ECO and co-approved by Site Manager).
- Remaining employed until the completion of the construction activities.
- Reporting to the Project Manager, including all findings identified onsite.
- Reporting any significant findings to the ECO.
- Preparing and submitting monthly reports to the ECO and Project Manager.
- Monitoring compliance by the Contractor.

In addition, the ESCO will:

- Undertake daily inspections of the site and surrounding areas.
- Audit compliance with the EMPr and conditions of the environmental authorisation.
- Take appropriate action if the specifications contained in the EMPr and conditions of the environmental authorisation are not followed.
- Monitor and verify that environmental impacts are kept to a minimum, as far as possible; and
- Ensure that activities onsite comply with all relevant environmental legislation.

## 1.2 Audit Scope and Purpose.

In accordance with Regulation 34 of the 2014 NEMA EIA Regulations (as amended) the holder of an environmental authorisation must, for the period during which the EA and EMPr, and where applicable the closure plan, remain valid —

- Ensure that the compliance with the conditions of the EA and the EMPr, and where applicable the closure plan, is audited; and*
- Submit an environmental audit report to the relevant competent authority.*

The purpose of this environmental audit is to verify compliance to the overarching environmental requirements specified as conditions of the EAs and EMPrs, and report on the extent to which the objectives of the EMPrs and are being achieved.

## 1.3 Monitoring Frequency and Reporting.

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 21<sup>st</sup> of May 2025 after which this report was compiled which serves to document and audit. This report covers the monthly reporting for the month of May 2025.



## 2 AUDITOR BACKGROUND.

NCC is a multi-disciplinary environmental consulting company based in South Africa which adopts a 'values driven' approach with a common purpose to conserve and create sustainable environments that enable people, planet and business to thrive. We are a trusted partner to major engineering and construction firms, mines, parastatals, film, sports and event production companies, municipalities, provincial and national government, and conservation organisations. Drawing on our years of experience on a wide range of projects, NCC works with our clients to develop, implement, and monitor customised services that add real value.

The auditor, Jennipher Sakaunda, is a senior environmental manager with more than 14 years' experience currently employed with NCC. Jennipher Sakaunda has experience in several environmental fields including environmental compliance monitoring and auditing, due diligence assessment, environmental impact and risk assessment, and compilation of environmental management plans/programmes.

**Table 2:** Details of the auditor.

|                       |                                                                                                                                                                                                |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Company</b>        | NCC Operations (Pty) Ltd                                                                                                                                                                       |
| <b>Auditor</b>        | Jennipher Sakaunda                                                                                                                                                                             |
| <b>Tel</b>            | +27 21 702 2884                                                                                                                                                                                |
| <b>Mobile</b>         | +27 69 510 7630                                                                                                                                                                                |
| <b>Email</b>          | <a href="mailto:jenniphers@ncc-group.co.za">jenniphers@ncc-group.co.za</a>                                                                                                                     |
| <b>Address</b>        | 26 Bell Close, Westlake Business Park Westlake, 7945                                                                                                                                           |
| <b>Affiliation</b>    | International Association of Impact Assessment South Africa.<br>Environmental Assessment Practitioner Association of South Africa.<br>South African Council of Natural Scientific Professions. |
| <b>Qualifications</b> | BSc (honors) Environmental Management                                                                                                                                                          |
| <b>Expertise</b>      | A detailed CV can be provided on request.                                                                                                                                                      |

### 3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (May 2025) included the following:

- Site establishment for the offsite laydown area.
- Construction of the internal road connecting the access road to the Temporary Site Offices (TSF)
- Fencing.
- Clearing and grubbing of PV area and levelling works.
- Drilling and pile installations.
- Reworking of the rain damaged portions of the access road.
- Construction of the temporary stormwater berm.
- Site Establishment.

#### 3.1 General Outstanding matters

Any major outstanding matters are to be recorded and summarised in the Concerns Register (**Annexure A**). The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

#### 3.2 Audits (Internal and External)

Internal audits are undertaken monthly by the Red Rocket ESCO. This ECO Audit was undertaken on the 21<sup>st</sup> of May 2025. Audit tables/checklists are attached to this report. The ECO undertakes external monthly audits.

## 4 WASTE MANAGEMENT

The contractor must make provision for waste avoidance, minimisation, and separation of waste where possible through recycling efforts. Waste management awareness must be done on an ongoing basis and must be provided through toolbox talks and awareness posters. The EMPr requires waste to be recycled. To ensure compliance the contractor has put out an RFQ to secure a service provider. The contractor is busy with selecting a service provide who will recycle waste onsite.

### 4.1 Domestic/ General Waste

Approximately **377kg** of general waste a was removed from site in the month of May 2025. Designated waste areas have been provided at the contractors' main site offices/laydown areas for purposes of temporary storage of waste prior to collection and transferal to the licensed waste facilities. Bins at the laydown area are colour coded for each waste type. No waste material from the site was recycled this month. Cleared alien vegetation is temporary stockpiled onsite before being disposed of at a registered licensed landfill.

The service providers dispose the general waste at Matjhabeng Local Municipality waste disposal site-Licence number: B33/2/340/21/P8 16/2/7/C404/D2/Z1/P367. Proof of disposal is available on request.

### 4.2 Hazardous waste

Hazardous waste skips are available at the dedicated waste storage area at each of the sub-contractors' site offices/lay down areas. Approximately **11 890 kg** of hazardous waste was disposed of in May 2025 at Vlakfontein which is a registered hazardous landfill site. Hazardous waste in form of oil spillages, cement spillages and contaminated soil is kept onsite until there is enough to dispose.

### 4.3 Wastewater

Approximately **9 710.5L** of sewerage waste was generated on site in the month of May 2025. Chemical toilets and a conservancy tank have been provided onsite. The General Authorisation that was issued by DWS for the includes the use of a conservancy tank up to a capacity of **50 000L**. The conservancy tank onsite has a capacity of 12 500l which is below the stipulated GA threshold. The contractor must ensure that this capacity is not exceeded.

The Appointed Service Provider removes sewage and dispose of it at Matjhabeng Local Municipality wastewater treatment facility - Licence No: 10/D4/J/G/2082. Proof of disposal is available onsite. The contractor must ensure the appointed service provider is licenced to provide sewer removal services. Additionally, adequate ablution facilities must be always provided.

## 5 PROTECTIVE MEASURES

### 5.1 General

Protective measures have been deployed to mitigate environmental impacts or prevent impacts from occurring which includes:

- Security guards are present on the site, with access control in place.
- Induction training is conducted for all persons working and visiting the site.
- Snake gaiters are provided.
- Spill kits.
- No-go areas are demarcated and provided with signage.
- Access cards
- Rapid alcohol detecting

## 6 ENVIRONMENTAL CONSERVATION

### 6.1 Conservation of Flora and Fauna

A permit to clear the site and relocate species of concern was received from the Free state Department of Economic, Small Business Development, Tourism and Environmental Affairs. The permit with Ref No. 202306000012649 was issued on 08/06/2023 to pluck protected and unprotected flora.

Clearance of alien vegetation that had established on the fields has continues; however, no clearance work has been done on the stockpiles. The contactor must monitor the cleared areas to ensure alien vegetation does not re-establish. All cleared alien vegetation must be disposed at the Matjhabeng Local Municipality waste disposal site. The cleared alien vegetation stockpiled onsite must be removed timeously to prevent the dispersion of seeds into other areas. Soil material moved across sites must be inspected for alien vegetation such as the soil that was moved from the access road to PV3 area to prevent the spread of alien vegetation.

On the 21<sup>st</sup> of May 2025 when the contractor was conducting works internal roads a snake was killed by one of the equipment onsite. Intentional hurting or killing of fauna is prohibited. Should snakes be encountered, they must be captured by a qualified person and safely released.

### 6.2 Water Management

Approximately **460 m<sup>3</sup>** of water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The GA allows for abstraction of 43 000m<sup>3</sup> annually, the contactor must ensure water abstraction does not exceed the licenced volumes. Tanks and pipes must be monitored on an ongoing basis

### 6.3 Soil Management

Cleared topsoil must be protected from erosion and alien vegetation establishment Alien vegetation has established on the stockpiles and must be cleared. Some of the topsoil stockpiles especially on the PV2 area exceed 2m in height, these are prone to erosion. The contract must flatten these stockpiles. Topsoil and subsoil from the excavation of must be stored separately.

### 6.4 Stormwater and Erosion onsite

The contractor's Stormwater Management Plan was approved, measures to manage erosion as per the approved SWMP have been implemented to prevent erosion and water ponding. More drains have been opened to prevent water ponding, and berms have been placed on the access roads to prevent them from being eroded. The contractor is also repairing areas that were damaged with rain on the access roads. Measures diverted clean stormwater away from the works towards the watercourses must be implemented.

## **7 INFRASTRUCTURE MANAGEMENT**

### **7.1 Access Roads**

The project team is using existing farm roads for current construction activities until such time as the project access roads and internal roads have been constructed. Berms have been added to the access roads to prevent erosion. The existing access roads must be maintained to address the effects of water ponding and erosion.

### **7.2 Fences, Gates, and Barricading**

The site is fenced with security personnel manning the gates. Access cards are used to allow entrance to site. Barricading was observed on site, and such should continue to be maintained around all open excavations to prevent potential fauna (wildlife and livestock) incidents. Old farm fences that have been removed, should they not be used they must be disposed of properly.

### **7.3 Buildings and Structures**

Containers have been established on site by various subcontractors that are being used as offices. Male and female ablation facilities have been provided. Chemical toilets and a conservancy tank are used to manage sewer onsite.

## **8 SOCIAL RESPONSIBILITY**

Any complaints from the public are to be recorded on complaints register maintained by the Contractor whose responsibility it is to track and resolve the complaints/issues that are raised. In addition, a box for receiving internal grievances is present at the main site office facility which allows for project staff to bring to the attention of the project management team any comments and or concerns.

## 9 ENVIRONMENTAL AWARENESS AND TRAINING

The contractor has undertaken Toolbox talks for the month of May 2025 covering the following topics:

- Spill Prevention and Response
- Reporting Environmental hazards
- Chance finds
- Housekeeping
- Chemical Safety
- Noise Pollution
- Pumping of water out of excavations.
- Hazardous Waste.
- Pollution Prevention: Cement and Concrete
- Housekeeping
- Fire Extinguisher
- Dust and Air Quality
- Importance of vehicle maintenance
- Soil Management
- Waste Management
- Using of spill kit
- Snake Awareness

## 10 HERITAGE

In the event of any unknown artefacts being uncovered during construction, the ESCO and Project Manager must be informed immediately who must then instruct work to be stopped in the immediate area and then promptly report the discovery/finding to the ECO, a heritage specialist and the relevant heritage authority to investigate and confirm if such discovery is in fact a heritage artefact of any significance. No activities impacting upon any heritage sites were reported during this reporting period.

## 11 WARNING & NCRS

No NCR reports were issued by the ECO in the month of May.

## 12 REHABILITATION

No rehabilitation works have commenced during this period, further rehabilitation is expected to occur on the project as and when other works have been completed.

## 13 INCIDENTS AND ACCIDENTS

All environmental related events, incidents and accidents are to be reported directly to the ECO and kept on a central register and included in the monthly report. No environmental incidents that occurred in May. A register of environmental incidents is attached as **Annexure C**.

## 14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 21<sup>st</sup> of May 2025 with observations documented in this report. Monthly ECO compliance reports are submitted to the Department (DFFE) by the ECO.



## 15 AUDIT METHODOLOGY

This section provides an overview of the methods employed in making observations and providing recommendations and conclusions derived from the audit procedures undertaken.

### 15.1 Audit Process

The site visit, data reviews and report drafting were undertaken by the ECO/auditor. The audit included the following procedures:

- **Site Inspections.** The areas and aspects covered during the inspections with concurrent discussions with the ESCO and site-based representatives of the EA holder included *inter alia*:
  - i. Access control to the sites.
  - ii. Ecologically sensitive areas, where applicable.
  - iii. Waste management.
  - iv. Incident and complaints management.
  - v. Landowner relations.
  - vi. Infrastructure management.
  - vii. Environmental Awareness.
  - viii. Record-keeping and document control.
  - ix. Stormwater and Erosion management
- **Documentation review.** This included:
  - i. A review of the EAs, EMPs and where applicable, method statements.
  - ii. A review of previous audit reports, records, observations, and findings.
  - iii. A review of any remedial and/or protective measures implemented.
  - iv. Identification, if applicable, any gaps requiring action and/or rectification.
- **Audit Report compilation.** This included:
  - i. Recording any observations and findings identified during the audit.
  - ii. Providing recommendations relating to improvement or non-compliance, if and where applicable.

## 15.2 Observation and Recommendation Determination

Observations and subsequent recommendations were based on and are limited to the following:

- i. Available documentation and records viewed or received prior, subsequent, or during the site visit.
- ii. Observations made during the period that the ECO/auditor was on site; and
- iii. Information received from both direct and cross-referenced discussions with permanent site-based staff.

## 15.3 Findings

Any key findings highlighted in this report will indicate areas and/or aspects that require improvement or rectification. The purpose of summarising the findings is to allow the EA holder to identify common management challenges that effect the level of compliance to the conditions of the EAs and EMPs.

Where findings and recommendations pertaining are deemed significant through compliance status or performance, they are documented as specific issues in the report. All site-specific observations are recorded in the corresponding audit checklist tables.

## 15.4 Audit Tables and Compliance Ratings

The audit table captures observations and recommendations made in relation to the conditions stipulated in the EAs and EMPs. It provides the reader with more detailed information in terms of what the stipulated requirements are in relation to the organisation's assessed current compliance status, according to the observations recorded by the auditor.

Ratings are calculated based on a scoring system whereby each auditable condition is provided with a score as highlighted in **Table 3** below.

**Table 4:** Compliance rating and scoring.

| Status                              | Compliance Rating |         | Description                                                                                                                                                                                |
|-------------------------------------|-------------------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | Abbreviation      | Scoring |                                                                                                                                                                                            |
| <i>Compliant</i>                    | C                 | 2       | <i>No improvements required</i>                                                                                                                                                            |
| <i>Partially Compliant</i>          | PC                | 1       | <i>Minor improvements required</i>                                                                                                                                                         |
| <i>Non-Compliant</i>                | NC                | 0       | <i>Major improvements required</i>                                                                                                                                                         |
| <i>Work in Progress</i>             | WiP               | -       | <i>Environmental management measures are underway but not yet fully implemented or verified, requiring further monitoring and assessment.</i>                                              |
| <i>Not Applicable / Not Audited</i> | NA                | -       | <i>No improvements required and / or the condition is either not, not yet or no longer relevant at the time of the audit</i>                                                               |
| <i>Informative</i>                  | info              | -       | <i>These relate to informative elements that provide either useful information or are descriptive in the explanation and understanding of statements or concepts in the audit criteria</i> |

Each condition has been ascribed a colour-coded status indicator of Compliant (green), Partially Compliant (orange), major-compliant (red), Not Auditable/Audited (grey), Work in Progress (light red) and Informative (blank/white) to assist the reader in determining aspects that require attention to improve on compliance achieved, if and where applicable. No compliance scoring is attributed any of the audit criteria information pertaining to the following three audit status symbols, namely 'NA', 'WiP', and 'info' as they were either not auditable and/or were not applicable/relevant at the time the audit was undertaken. In other words, they are excluded from the overall compliance rating calculations.

An overall compliance rating is calculated as a percentage to provide the reader with an overview of compliance to the relevant audit criteria however each condition should be considered on its own merits as the ratings do not necessarily portray the severity or impact of the reported finding relating to a condition.

## 16 ASSUMPTIONS AND LIMITATIONS

The ECO compliance audit and associated report are based upon the assumptions that:

- i. Documentation provided to the ECO/auditor is factual and true.
- ii. The audit is based purely on the conditions as stipulated in the EAs and EMPs.
- iii. The construction phase is currently underway and operational phase activities are not applicable.
- iv. Documentation / reports were randomly sampled / reviewed in order to accommodate time constraints.
- v. Where visual observations were not possible either due to physical access constraints or safety constraints, the ECO/auditor used other means to determine compliance, either through requesting written evidence provided by contractors / service providers who service the site or via interviews with technical site-based staff.

## 17 CONSULTATION PROCESS

The approach of consultation followed during the environmental audit was based on written (email) and telephonic correspondence between the ECO/auditor and the Environmental Site Compliance Officer which also includes consultation and communication with the EA holder and competent authority in terms of report submission.

## 18 FINDINGS

Findings are listed in the attached checklists, and it should be noted that findings should be considered individually in the context of the full audit and each condition and associated rating.

The following findings were noted onsite:

- Clearance of alien vegetation is on-going.
- Stockpile height exceeds 2m.
- Stormwater measures are being implemented.
- Alien vegetation was observed on stockpiles.
- Waste is not recycled.
- Access roads are rain damaged.
- Several pillages were recorded onsite.

Based on the outcomes of the audit it was established that the objectives of the EAs and EMPs were achieved in terms of:

- i. *Sufficiently providing for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis.*
- ii. *Ensuring compliance with the provisions of environmental authorisation and EMP.*

### 18.1 Minor improvements required.

- Waste recycling must be done onsite.

### 18.2 Major improvements required.

- Maintenance of access roads.
- Clearance of all alien vegetation including on stockpiles.
- Reduce the stockpiles height.
- Vehicle, equipment and chemical toilets maintenance and servicing must be done to prevent spillages

## 19 AUDIT SUMMARY

In terms of the findings and results of the **May 2025** ECO audit, the project achieved an overall **97.4%** compliance rating with the conditions of the EAs and EMPs.

Table 4: Compliance Scoring

| No                                        | Audit criteria                                                                             | Compliant (C) | Partially Compliant (PC) | Major-non-Compliant (NC) | Work in Progress | Normative (info) | Not Applicable / Not Audited (NA) | Percentage Score      |
|-------------------------------------------|--------------------------------------------------------------------------------------------|---------------|--------------------------|--------------------------|------------------|------------------|-----------------------------------|-----------------------|
| 1                                         | Environmental Authorisation for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1) | 24            | 1                        | 0                        | 1                | 11               | 3                                 | (98%)                 |
| 2                                         | Environmental Authorisation for Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)   | 24            | 1                        | 0                        | 1                | 20               | 2                                 | (98%)                 |
| 3                                         | Environmental Authorisation for Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)   | 24            | 1                        | 0                        | 1                | 20               | 2                                 | (98%)                 |
| 4                                         | EMPr for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)                        | 259           | 11                       | 2                        | 0                | 12               | 36                                | (97%)                 |
| 5                                         | EMPr Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)                              | 257           | 11                       | 3                        | 0                | 11               | 38                                | (97%)                 |
| 6                                         | EMPr Virginia 3 Solar Park (DFFE REF NO: 14/12/16/3/3/2/2101)                              | 227           | 13                       | 2                        | 0                | 44               | 38                                | (96%)                 |
| Overall total no. conditions              |                                                                                            | 815           | 38                       | 7                        | 3                | 126              | 119                               |                       |
| Audited conditions                        |                                                                                            | 1630          | 38                       | 0                        | -                | -                | -                                 | (Potential max score) |
| Overall Compliance Rating Calculation (%) |                                                                                            | 97.4%         |                          |                          |                  |                  |                                   |                       |

## 20 RECOMMENDATIONS

**Based on the findings identified the following is recommended:**

- Alien vegetation clearance must continue onsite, and the contractor must monitor the cleared areas to prevent reestablishment of alien vegetation.
- All trenches must be barricaded at the end of each working day.
- Stockpiles height must not exceed 2m.
- Only roadworthy vehicles and equipment must enter site.
- Re-trainings on spillages and vehicle maintenance must be done.

## 21 CONCLUSION

The contractor must ensure that systems and resources to monitor and manage environmental risks and impacts adequately are in place. Resources and personnel to train employees on the contents of the EMPs must be made to ensure that the project runs effectively and efficiently with minimal impact to the biophysical and socio-economic environment.

In general, the EMPs are effective in their current format in terms of content and relevance and there are no major shortcomings. The EMP's sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with this project.

**PREPARED BY:**

A handwritten signature in black ink, appearing to read 'Sakaunda'.

**Sakaunda Jennipher**

Environmental Control Officer

NCC Operations (Pty) Ltd

**M** ·069 510 7630

**E** · [jenniphers@ncc-group.co.za](mailto:jenniphers@ncc-group.co.za)

**REVIEWED BY:**

A handwritten signature in black ink, appearing to read 'Nick Gates'.

**Nick Gates**

Senior Environmental Consultant

NCC Operations (Pty) Ltd

**M** ·073 1998 431

**E** ·[nickg@ncc-group.co.za](mailto:nickg@ncc-group.co.za)



## ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

### Open Concerns/Complaint

| No | Observation date | Concern/Complaint | Suggested Due Date <sup>1</sup> | Proposed Corrective Action | Status | Closure status |
|----|------------------|-------------------|---------------------------------|----------------------------|--------|----------------|
|    |                  |                   |                                 |                            |        |                |

*\*The concerns register is updated once the ECO is present on site.*

### Closed Concerns

| No | Observation date | Concern/Complaint | Due Date suggested by ECO | Corrective Action Taken | Outcome | Closure status |
|----|------------------|-------------------|---------------------------|-------------------------|---------|----------------|
|    |                  |                   |                           |                         |         |                |
|    |                  |                   |                           |                         |         |                |

## ANNEXURE B - NCR REGISTER

| Ref No. | Originator | Dated Issued | Description | Proposed Corrective Action | Closure Status | Closure Date | Further Action Required |
|---------|------------|--------------|-------------|----------------------------|----------------|--------------|-------------------------|
|         |            |              |             |                            |                |              |                         |

## ANNEXURE C - INCIDENT REGISTER

| Date       | Type                                                                                           | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                       | Volume                                         | Remedial Action                                              |                                                                                 |
|------------|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|--------------------------------------------------------------|---------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna &Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                                                 |                                                | Immediate<br>Corrective<br>Actions                           | Preventative<br>measures                                                        |
| 20/03/2025 | Waste water                                                                                    | Soil pollution                                                                               | O20, 2025, at approximately 8:28, the conservative tank being used to collect wastewater from conservancy tank had overfilled, and a Spillage had occurred spillage of approximately 8-10 litres of wastewater mixed with the cleaning material. the toilet supplier attended to the spill immediate & initiated spill Clean-up. Contaminated soil was taken to the hazardous waste skip.     | 10 l<br>(below<br>Section<br>30<br>threshold ) | Clean- up must be done as soon as the spills are identified. | The conservancy tank must be emptied more frequently to reduce overfilling.     |
| 19/03/2025 | Waste water                                                                                    | Soil pollution                                                                               | Approximately 12 litres of wastewater mixed with the cleaning chemicals where toilets are located. The toilet had been leaking since the previous day and wastewater was contained in a drip tray. The toilet supplier was notified, and he came to service<br><br>The toilets; however, during servicing; the drip tray spilled over causing the spillage of the wastewater onto the ground. | 12l<br>(below<br>Section<br>30<br>threshold )  | Clean- up must be done as soon as the spills are identified. | Leaking toilets must not be allowed onsite.                                     |
| 08/03/2025 | Diesel spillage                                                                                | Soil pollution                                                                               | On 08 March 2025 at 05:30, security supervisor discovered a diesel leakage during the morning patrol. The spillage occurred due to the diesel injectors that were                                                                                                                                                                                                                             | 20l<br>(below<br>Section<br>30<br>threshold )  | Clean- up must be done as soon as the spills are identified  | Vehicles must be maintained regular . only road worthy vehicles must be onsite. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                 | Volume                                            | Remedial Action                                             |                                                                                |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                              |                                                   | Immediate Corrective Actions                                | Preventative measures                                                          |
|            |                                                                                  |                                                                            | loose one of them was not properly fitted and diesel pressure removed them while the bakkie was in motion.                                                                                                                                                                                                                                                              |                                                   |                                                             |                                                                                |
| 07/03/2025 | Water and antifreeze                                                             | Soil pollution                                                             | The Driver parked the minibus on site, shortly a leak observed containing a mixture of water and antifreeze, while also exhibiting signs of overheating.                                                                                                                                                                                                                | -                                                 | Clean- up must be done as soon as the spills are identified | Vehicles must be maintained regular. only road worthy vehicles must be onsite. |
| 06/05/2025 | Water mixed with antifreeze spillage                                             | Soil pollution                                                             | On 6 May 2025 at 14:00, the TLB Operator was busy moving spoil material near the access road to the allocated spoil Stockpile area, when the TLB, radiator fan belt snapped & the container that stores water & antifreeze busted. Approximately 5 Liters of water with antifreeze spilled                                                                              | 5 litres<br>(below<br>Section<br>30<br>threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.                  |
| 08/05/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | A chemical toilet in PV3 at the laydown area at around 3:53 pm, 08 May 2025 was reported to be leaking, when the toilet was assessed, it was identified that there was a broken pipe that leaked the chemical water. An immediate action was taken to clean up the spillage. The contaminated soil was collected into the bags and taken to site waste management area. | 6 litres<br>(below<br>Section<br>30<br>threshold) | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent.         |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                   | Volume                                   | Remedial Action                                             |                                                                        |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                |                                          | Immediate Corrective Actions                                | Preventative measures                                                  |
| 12/05/2025 | Diesel spillage                                                                  | Soil pollution                                                             | On 12-05-2025 at 06:40, the ambulance was on the way to the access control point along the main access road, when it had a sudden breakdown and diesel was spilled along the access road, leaving a trail of diesel spill for approximately +400 Metres. Approximately +2 Litres of diesel was spilled                                                                                                                                                    | 2 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.          |
| 15/05/2025 | Hydraulic oil spillage                                                           | Soil pollution                                                             | On the 15/05/2025, a side tipper truck was transporting spoil material when the cylinder failed and spilled ~7 litres of hydraulic oil, about 455m from the nearest watercourse. The contaminated soil was promptly cleaned up.                                                                                                                                                                                                                           | 7 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.          |
| 20/05/2025 | Toilet Cleaner mixed with water spillage                                         | soil pollution                                                             | It was around 11:30 am when it was reported that there was a spillage, that when the Fidamo team was about to clean the toilets at Pv1 Laydown area, a pipe from the generator busted and the water leaked from the broken pipe. The water that spilled was approximately 3-4 Liters and the pipe was immediately stopped. The chemical that was in the water is blue splash Toilet chemical. An immediate action was taken to clean up the spillage. The | 4 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                     | Volume                                    | Remedial Action                                              |                                                                                 |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|--------------------------------------------------------------|---------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                  |                                           | Immediate Corrective Actions                                 | Preventative measures                                                           |
|            |                                                                                  |                                                                            | contaminated soil was collected into the bags and taken to site waste management area.                                                                                                                                                                                                                                                                                                                                      |                                           |                                                              |                                                                                 |
| 21/05/2025 | Fauna                                                                            | Loss of biodiversity                                                       | On the 21/05/2025 a snake was fatally wounded during the internal road construction works.                                                                                                                                                                                                                                                                                                                                  | N/A                                       | The dead animal was buried.                                  | N/A                                                                             |
| 26/05/2025 | Hydraulic oil spillage                                                           | Soil pollution                                                             | on the 26/05/2025, at around 16:50 a drill rig operator noticed a leak from the machine, he immediately reported the leak to the supervisor. The supervisor called the mechanic but did not report the spillage. The oil further spilled to the soil during the repair attempts which were done under poor lighting. The spillage was left overnight and was only reported to the EO the next morning when the shift began. | 25 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified. | An NCR must be issued subcontractor for failing to report spillage immediately. |

## ANNEXURE D – PHOTOGRAPHS



**Figure 1:** Chemical bund onsite.



**Figure 2:** Stockpile exceeding 2m in height.





**Figure 3:** Concrete spillages that must be removed and not buried.



**Figure 4:** Old fences that must be removed.





**Figure 5:** Cleared trees should be donated.



**Figure 6:** Alien vegetation on stockpiles



**Figure 7:** Clean toilets



**Figure 8:** On-going clearance of alien vegetation.

**THIS PAGE WAS INTENTIONALLY LEFT BLANK**

**JUNE 2025**



---

# ECO MONTHLY ENVIRONMENTAL MONITORING REPORT

Virginia OHL Line and Switching Station Matjhabeng,  
Lejweleputswa District Municipality within the jurisdiction  
of the Free State Province.

---

**PREPARED FOR:**

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

Department of Forestry, Fisheries, and the Environment: Compliance Monitoring

**DATED:**

June 2025

**PREPARED BY:**

NCC Operations

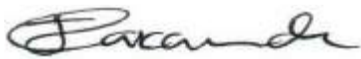
T • 021 702 2884

E • [info@ncc-group.co.za](mailto:info@ncc-group.co.za)

## DECLARATION OF INDEPENDENCE

I, Jennipher Sakaunda, as duly authorised representative of NCC Operations (Pty) Ltd ("**NCC**"), hereby confirm my independence (as well as that of NCC) as an auditor and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which URSA Energy (Pty) Ltd has appointed NCC as Environmental Control Officer ("**ECO**"), other than fair remuneration for work performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'J Sakaunda', is positioned below the 'Signed:' text.

**Jennipher Sakaunda**

03 July 2025

Environmental Control Officer

NCC Operations (Pty) Ltd

## **LIABILITY DISCLAIMER AND CONFIDENTIALITY CLAUSE**

All inspections conducted, as well as reports and recommendations provided by NCC are purely advisory. They are primarily intended for the purpose of assisting clients in loss control, risk management as well as health, safety, and environmental procedures.

Observations and recommendations are the result of practices and conditions observed, and information made available to us in various forms at the time of our visit. They do not purport to refer to or guarantee compliance with local or government regulations which may be applicable to such practices and conditions. This report should not be considered a definitive listing of all existing risks nor an absolute solution to all indicated risks, or hazards present from time to time in the Client Organisation. The report should always be considered in its entirety; individual sentences, paragraphs or sections of the report should not be used in isolation.

This report should not be reproduced except in its entirety, including this liability disclaimer or contents reproduced or disclosed to any third party without the prior written approval of NCC.

NCC assumes no responsibility for any losses incurred as a result of the implementation, management, and operation of recommended health, safety and environmental systems, processes and procedures.

## DOCUMENT CONTROL

|                     |                                             |
|---------------------|---------------------------------------------|
| <b>REPORT TITLE</b> | Monthly ECO Environmental Monitoring Report |
| <b>PROJECT</b>      | Virginia OPL Line and Switching Station     |
| <b>LOCATION</b>     | Free State Province                         |
| <b>EA HOLDER</b>    | URSA Energy (Pty) Ltd                       |
| <b>ECO</b>          | NCC Operations (Pty) Ltd                    |
| <b>REVISION</b>     | 00                                          |
| <b>DATE</b>         | 03/07/2025                                  |

| Revision | Date       | Description                  |
|----------|------------|------------------------------|
| Rev 00   | 03/07/2025 | First Draft - Internal       |
| Rev 01   | TBC        | Final - Authority submission |

## REPORT DISTRIBUTION LIST

| Name                   | Organisation                      | Issued     | Format     |
|------------------------|-----------------------------------|------------|------------|
| Janine Brasington      | Red Rocket South Africa (Pty) Ltd | 03/07/2025 | Electronic |
| Serina Pillay          | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Maggie Logan           | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Director of Compliance | DFFE                              | TBC        | Electronic |



## TABLE OF CONTENTS

|                                                    |           |
|----------------------------------------------------|-----------|
| <b>TABLE OF FIGURES .....</b>                      | <b>7</b>  |
| <b>ABBREVIATIONS .....</b>                         | <b>8</b>  |
| <b>1 INTRODUCTION .....</b>                        | <b>10</b> |
| 1.1 Background.....                                | 10        |
| 1.2 Audit Scope and Purpose.....                   | 12        |
| 1.3 Monitoring Frequency and Reporting.....        | 12        |
| <b>2 AUDITOR BACKGROUND. ....</b>                  | <b>13</b> |
| <b>3 GENERAL (NOTABLE EVENTS) .....</b>            | <b>14</b> |
| 3.1 General Outstanding matters.....               | 14        |
| 3.2 Audits (Internal and External).....            | 14        |
| <b>4 WASTE MANAGEMENT.....</b>                     | <b>15</b> |
| 4.1 Domestic/ General Waste.....                   | 15        |
| 4.2 Hazardous waste.....                           | 15        |
| 4.3 Wastewater .....                               | 16        |
| <b>5 PROTECTIVE MEASURES .....</b>                 | <b>16</b> |
| 5.1 General .....                                  | 16        |
| <b>6 ENVIRONMENTAL CONSERVATION.....</b>           | <b>17</b> |
| 6.1 Conservation of Flora and Fauna.....           | 17        |
| 6.2 Water Management.....                          | 17        |
| 6.3 Soil Management .....                          | 17        |
| 6.4 Stormwater and Erosion onsite .....            | 17        |
| <b>7 INFRASTRUCTURE MANAGEMENT.....</b>            | <b>18</b> |
| 7.1 Access Roads.....                              | 18        |
| 7.2 Fences, Gates, and Barricading.....            | 18        |
| 7.3 Buildings and Structures .....                 | 18        |
| <b>8 SOCIAL RESPONSIBILITY.....</b>                | <b>19</b> |
| <b>9 ENVIRONMENTAL AWARENESS AND TRAINING.....</b> | <b>20</b> |
| <b>10 HERITAGE.....</b>                            | <b>21</b> |
| <b>11 WARNING &amp; NCRS.....</b>                  | <b>21</b> |

|           |                                                        |           |
|-----------|--------------------------------------------------------|-----------|
| <b>12</b> | <b>REHABILITATION .....</b>                            | <b>22</b> |
| <b>13</b> | <b>INCIDENTS AND ACCIDENTS .....</b>                   | <b>22</b> |
| <b>14</b> | <b>MEETINGS AND OTHER CORRESPONDANCE.....</b>          | <b>22</b> |
| <b>15</b> | <b>AUDIT METHODOLOGY.....</b>                          | <b>23</b> |
| 15.1      | Audit Process.....                                     | 23        |
| 15.2      | Observation and Recommendation Determination.....      | 24        |
| 15.3      | Findings.....                                          | 24        |
| 15.4      | Audit Tables and Compliance Ratings .....              | 24        |
| <b>16</b> | <b>ASSUMPTIONS AND LIMITATIONS .....</b>               | <b>26</b> |
| <b>17</b> | <b>CONSULTATION PROCESS.....</b>                       | <b>26</b> |
| <b>18</b> | <b>FINDINGS .....</b>                                  | <b>27</b> |
| 18.1      | Minor improvements required. ....                      | 27        |
| 18.2      | Major improvements required.....                       | 27        |
| <b>19</b> | <b>AUDIT SUMMARY.....</b>                              | <b>28</b> |
| <b>20</b> | <b>RECOMMENDATIONS .....</b>                           | <b>29</b> |
| <b>21</b> | <b>CONCLUSION.....</b>                                 | <b>29</b> |
|           | <b>ANNEXURE A – CONCERNS/COMPLAINTS REGISTER .....</b> | <b>31</b> |
|           | <b>ANNEXURE B - NCR REGISTER .....</b>                 | <b>31</b> |
|           | <b>ANNEXURE C - INCIDENT REGISTER.....</b>             | <b>32</b> |
|           | <b>ANNEXURE D – PHOTOGRAPHS .....</b>                  | <b>37</b> |
|           | <b>THIS PAGE WAS INTENTIONALLY LEFT BLANK .....</b>    | <b>41</b> |

## TABLE OF FIGURES

|                                                                                    |    |
|------------------------------------------------------------------------------------|----|
| Figure 1: Incomplete concrete bund for the waste area.....                         | 38 |
| Figure 2: Waste Segregation compartments at the waste area. ....                   | 38 |
| Figure 3: Barricaded excavation along the line.....                                | 39 |
| Figure 4: Scrap metal that must be recycled. ....                                  | 39 |
| Figure 5: Diesel buzzer on an impervious surface and hazardous chemical bund. .... | 40 |
| Figure 6: Groundwater that must be pumped out before concrete is poured.....       | 40 |

## ABBREVIATIONS

|             |                                                         |
|-------------|---------------------------------------------------------|
| <b>BAR</b>  | Basic Assessment Report                                 |
| <b>CA</b>   | Competent Authority                                     |
| <b>DEA</b>  | Department of Environmental Affairs (now DFFE)          |
| <b>DFFE</b> | Department of Forestry, Fisheries, and the Environment  |
| <b>DWS</b>  | Department of Water and Sanitation                      |
| <b>EA</b>   | Environmental Authorisation                             |
| <b>EAP</b>  | Environmental Assessment Practitioner                   |
| <b>ECO</b>  | Environmental Control Officer                           |
| <b>EIA</b>  | Environmental Impact Assessment                         |
| <b>EMPr</b> | Environmental Management Programme                      |
| <b>EO</b>   | Environmental Officer (Contractor)                      |
| <b>ER</b>   | Employer's Representative                               |
| <b>ESCO</b> | Environmental Site Compliance Officer                   |
| <b>kV</b>   | Kilovolt                                                |
| <b>MVA</b>  | Megavolt Amperes                                        |
| <b>MW</b>   | Megawatt                                                |
| <b>NCC</b>  | NCC Operations                                          |
| <b>NCR</b>  | Non-Compliance Report                                   |
| <b>NEMA</b> | National Environmental Management Act (No. 107 of 1998) |
| <b>NWA</b>  | National Water Act (No. 36 of 1998)                     |

|             |                                 |
|-------------|---------------------------------|
| <b>OHPL</b> | Overhead Power Line             |
| <b>SDC</b>  | Safe Disposal Certificate       |
| <b>SHE</b>  | Safety, Health, and Environment |
| <b>SS</b>   | Substation                      |
| <b>TBC</b>  | To Be Confirmed                 |

# 1 INTRODUCTION

## 1.1 Background

NCC Operations (Pty) Ltd ("**NCC**") was appointed by URSA Energy (Pty) LTD ("**URSA**") to provide a suitably experienced independent Environmental Control Officer ("**ECO**") for the construction phase of Virginia Solar Park which will be connected to the Eskom Theseus Main Transmission Substation (MTS). The site is located on Farm Blomskraal 216, Ventersburg RD located within the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province. On completion the facility will consist of the Photovoltaic (PV) Power Plant with a maximum generation capacity up to 100 MW, a 132kV powerline connecting the substation to the Eskom Theseus substation which is located 16.2 km North-East of the north-western corner of project site.

The ECO has the responsibility of ensuring the mitigation/ rehabilitation measures and conditions referred to in the Environmental Authorisation ("**EA**") are implemented, as well as ensuring compliance with the requirements of the Environmental Management Programme ("**EMPr**"). This report provides an insight into the overall compliance performance and a summary of other environmental concerns and potential environmental risks through observations during site inspections.

This report is based on the following environmental conditions or requirements:

- a) Environmental Authorisations (EA)
  - 1) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
  - 2) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)
- b) Environmental Management Programmes (EMPr)
- c) Relevant environmental legislation.
- d) All other environmental permits, licenses, and authorisations.

The notification of commencement of construction was submitted to the DFFE for Virginia Solar Plant (Pty) Ltd on the 02 May 2024.

This report addresses conditions set out in the EA which states the ECO as part of their duties: "*The ECO must keep record of all activities on site, problems identified, transgressions noted, and a task schedule of tasks undertaken by the ECO.*" As per the roles and responsibilities in the Virginia Solar Project ("**VSP**") EMPr, the primary role of the ECO will be to monitor the construction activities and ensure that the mitigation measures

of the EMPr and Environmental Authorisations (EA) are implemented. This report also includes an audit checklist for the VSP EA as follows:

- 1) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
- 2) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)

A summary of the various environmental requirements i.e. the audit criteria relating to the overall project is provided in **Table 1**.

**Table 1:** Summary of environmental requirements / criteria relating to the overall project.

| Components of overall project         | Environmental requirements / criteria |               |                                |          |
|---------------------------------------|---------------------------------------|---------------|--------------------------------|----------|
|                                       | DFFE EA Ref No.                       | Issue date    | Approved EMPr<br>(Compiled by) | Date     |
| Virginia Solar Park Switching Station | 14/12/16/3/3/2/2099/2                 | 20 April 2022 | AGES Limpopo (Pty) Ltd         | Jan 2022 |
| Virginia Solar Park OHPL              | 14/12/16/3/3/1/2444                   | 02 Feb 2022   | AGES Limpopo (Pty) Ltd         | Dec 2021 |

This report represents the monitoring for the Construction Phase. The responsibility of enforcement of the conditions of the EAs and EMPrs lies with the Project and Project Manager, while the Department of Forestry, Fisheries, and the Environment ("DFFE") Environmental Management Inspectorate ("EMI") may also enforce existing and potentially new conditions through compliance notices.

An Environmental Site Compliance Officer ("ESCO") has been appointed by the holder of the EA to monitor the project compliance onsite on a full-time basis on behalf of the EA holder. The responsibilities of the ESCO includes:

- Monitoring conditions of the Basic Assessment Reports ("BARs"), Environmental Impact Report (EIR) EAs and the EMPrs.
- Ensuring compliance with all relevant environmental legislation.
- Approving method statements (reviewed by the ECO and co-approved by Site Manager).
- Remaining employed until the completion of the construction activities.
- Reporting to the Project Manager, including all findings identified onsite.
- Reporting any significant findings to the ECO.

- Preparing and submitting monthly reports to the ECO and Project Manager.
- Monitoring compliance by the Contractor.

In addition, the ESCO will:

- Undertake daily inspections of the site and surrounding areas.
- Audit compliance with the EMPr and conditions of the environmental authorisation.
- Take appropriate action if the specifications contained in the EMPr and conditions of the environmental authorisation are not followed.
- Monitor and verify that environmental impacts are kept to a minimum, as far as possible; and
- Ensure that activities onsite comply with all relevant environmental legislation.

## **1.2 Audit Scope and Purpose.**

In accordance with Regulation 34 of the 2014 NEMA EIA Regulations (as amended) the holder of an environmental authorisation must, for the period during which the EA and EMPr, and where applicable the closure plan, remain valid —

- a) Ensure that the compliance with the conditions of the EA and the EMPr, and where applicable the closure plan, is audited; and*
- b) Submit an environmental audit report to the relevant competent authority.*

The purpose of this environmental audit is to verify compliance to the overarching environmental requirements specified as conditions of the EAs and EMPrs, and report on the extent to which the objectives of the EMPrs and are being achieved.

## **1.3 Monitoring Frequency and Reporting.**

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 23<sup>rd</sup> of June 2025 after which this report was compiled which serves to document and audit. This report covers the monthly reporting for the month of June 2025.



## 2 AUDITOR BACKGROUND.

NCC is a multi-disciplinary environmental consulting company based in South Africa which adopts a 'values driven' approach with a common purpose to conserve and create sustainable environments that enable people, planet and business to thrive. We are a trusted partner to major engineering and construction firms, mines, parastatals, film, sports and event production companies, municipalities, provincial and national government, and conservation organisations. Drawing on our years of experience on a wide range of projects, NCC works with our clients to develop, implement, and monitor customised services that add real value.

The auditor, Jennipher Sakaunda, is a senior environmental manager with more than 14 years' experience currently employed with NCC. Jennipher Sakaunda has experience in several environmental fields including environmental compliance monitoring and auditing, due diligence assessment, environmental impact and risk assessment, and compilation of environmental management plans/programmes.

**Table 2:** Details of the auditor.

|                       |                                                                                                                                                                                                |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Company</b>        | NCC Operations (Pty) Ltd                                                                                                                                                                       |
| <b>Auditor</b>        | Jennipher Sakaunda                                                                                                                                                                             |
| <b>Tel</b>            | +27 21 702 2884                                                                                                                                                                                |
| <b>Mobile</b>         | +27 69 510 7630                                                                                                                                                                                |
| <b>Email</b>          | <a href="mailto:jenniphers@ncc-group.co.za">jenniphers@ncc-group.co.za</a>                                                                                                                     |
| <b>Address</b>        | 26 Bell Close, Westlake Business Park Westlake, 7945                                                                                                                                           |
| <b>Affiliation</b>    | International Association of Impact Assessment South Africa.<br>Environmental Assessment Practitioner Association of South Africa.<br>South African Council of Natural Scientific Professions. |
| <b>Qualifications</b> | BSc (honors) Environmental Management                                                                                                                                                          |
| <b>Expertise</b>      | A detailed CV can be provided on request.                                                                                                                                                      |

### 3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (June 2025) included the following:

- Site establishment for the offsite laydown area.
- Excavation of monopole foundations.
- Cast blinding slab and steel fixing at the OHL.
- Earth mat installation works at the switching station area.
- Construction of the internal road connecting the access road to the Temporary Site Offices (TSF) and Switching Station.
- Fencing.
- Reworking of the rain damaged portions of the access road.

#### 3.1 General Outstanding matters

Any major outstanding matters are to be recorded and summarised in the Concerns Register (**Annexure A**). The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

#### 3.2 Audits (Internal and External)

Internal audits are undertaken monthly by the Red Rocket ESCO. This ECO Audit was undertaken on the 23<sup>rd</sup> of June 2025. Audit tables/checklists are attached to this report. The ECO undertakes external monthly audits.

## 4 WASTE MANAGEMENT

The contractor must make provision for waste avoidance, minimisation, and separation of waste where possible through recycling efforts. Waste management awareness must be done on an ongoing basis and must be provided through toolbox talks and awareness posters. A waste station is under construction at V3 where waste will be temporarily stored, stored and recycled. The waste station includes a bund where waste will be stored and various compartments where waste will be sorted into. The contractor must ensure that the waste area has a roof to protect waste from weather elements. Additionally, the compartment must be on an impervious surface. The EMP requires waste to be recycled, and the contractor is finalising the appointment of a service provider.

### 4.1 Domestic/ General Waste

Approximately **490 kg** of general waste was removed from site in the month of June 2025. Waste bins are placed along the OHL line where each team will be working, at the end of the day waste is collected and placed at the laydown areas for temporary storage. Designated waste areas have been provided at the contractors' main site offices/laydown areas for purposes of temporary storage of waste prior to collection and transferal to the licensed waste facilities. Bins at the laydown area are colour coded for each waste type. No waste material from the site was recycled this month. Scrap metal at the Ablon laydown area must be taken for recycling. Cleared alien vegetation is temporarily stockpiled onsite before being disposed of at a registered licensed landfill.

The service providers dispose the general waste at Matjhabeng Local Municipality waste disposal site-Licence number: B33/2/340/21/P8 16/2/7/C404/D2/Z1/P367. Proof of disposal is available on request.

### 4.2 Hazardous waste

Hazardous waste skips are available at the dedicated waste storage area at each of the sub-contractors' site offices/lay down areas. Approximately **4780 kg** of hazardous waste was disposed of in June 2025 at Vlakfontein which is a registered hazardous landfill site. Hazardous waste in form of oil spillages, cement spillages and contaminated soil is kept onsite until there is enough to dispose. Several spillages have been recorded on site, this is concerning. To reduce the number of spillages the ESCO together with the contractors Environmental Officer must re-train workers on spillages, ensure all vehicles are serviced and only road worthy are allowed onsite.

### 4.3 Wastewater

Approximately **54 850.3 L** of sewerage waste was generated on site in the month of June 2025. Chemical toilets and a conservancy tank have been provided onsite. Several incidents spillages from the chemical toilets have been recorded, the contractor must ensure these chemical toilets are serviced regularly and drip trays are placed under each toilet.

The General Authorisation that was issued by DWS for the includes the use of a conservancy tank up to a capacity of 50 000l. The conservancy tank onsite has a capacity of 12 500l which is below the stipulated GA threshold. The contractor must ensure that this capacity is not exceeded.

The Appointed Service Provider removes sewage and disposes of it at Matjhabeng Local Municipality wastewater treatment facility - Licence No: 10/D4/J/G/2082. Proof of disposal is available onsite. The contractor must ensure the appointed service provider is licenced to provide sewer removal services. Additionally, adequate ablution facilities must be always provided.

## 5 PROTECTIVE MEASURES

### 5.1 General

Protective measures have been deployed to mitigate environmental impacts or prevent impacts from occurring which includes:

- Security guards are present on the site, with access control in place.
- Induction training is conducted for all persons working and visiting the site.
- Snake gaiters are provided.
- Spill kits are available on site.
- No-go areas are demarcated and provided with signage.
- Access cards are used to enter and exit the site.
- Rapid alcohol detecting is in place.

## 6 ENVIRONMENTAL CONSERVATION

### 6.1 Conservation of Flora and Fauna

A permit to clear the site and relocate species of concern was received from the Free state Department of Economic, Small Business Development, Tourism and Environmental Affairs. The permit with Ref No. 202306000012649 was issued on 08/06/2023 to pluck protected and unprotected flora.

Clearance of alien vegetation has commenced; the contactor must monitor the cleared areas to ensure alien vegetation does not re-establish. It is important that the contractor clears all the alien vegetation as some of the alien plants will soon be dispersing seed creating a seed bank. This will make complete eradication of these plants difficult in the long term. The contractor must make an effort to remove the stockpiled alien vegetation to the Matjhabeng Local Municipality for disposal

Several trees not located within the area of the OHL have birds' nest located in them, these nests must be recorded, and the trees must be avoided.

### 6.2 Water Management

Approximately **834 m<sup>3</sup>** of water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The GA allows for abstraction of 43 000m<sup>3</sup> annually, the contactor must ensure water abstraction does not exceed the licenced volumes.

### 6.3 Soil Management

Cleared topsoil has been stockpiled along the OHL line and the switching station. These must be protected from erosion and alien vegetation establishment. Alien vegetation has established on the stockpiles and must be cleared. Groundwater encountered during excavation must be pumped out before concrete is poured to prevent ground water contamination. Topsoil and subsoil from the excavation of must be stored separately.

### 6.4 Stormwater and Erosion onsite

The contractor's Stormwater Management Plan was approved, measures to manage erosion as per the approved SWMP have been implemented to prevent erosion and water ponding. More drains have been opened to prevent water ponding, and berms have been placed on the access roads to prevent them from being eroded. Measures diverted clean stormwater away from the works towards the watercourses must be implemented.

## **7 INFRASTRUCTURE MANAGEMENT**

### **7.1 Access Roads**

The project team is using existing farm roads for current construction activities until such time as the project access roads and internal roads have been constructed. The contractor has commenced with the regrading of the access roads to address the effects water ponding and erosion. Road maintenance must be done on a regular basis.

### **7.2 Fences, Gates, and Barricading**

The site is fenced with security personnel manning the gates. Access cards are used to allow entrance to site. Barricading was observed on site, and such should continue to be maintained around all open excavations along the OHPL servitudes to prevent potential fauna (wildlife and livestock) incidents. All excavation along the line must be barricaded and deep excavation signs must be placed.

### **7.3 Buildings and Structures**

Containers have been established on site by various subcontractors that are being used as offices. Male and female ablution facilities have been provided. Chemical toilets and a conservancy tank are used to manage sewer onsite.

## 8 SOCIAL RESPONSIBILITY

Any complaints from the public are to be recorded on complaints register maintained by the Contractor whose responsibility it is to track and resolve the complaints/issues that are raised. In addition, a box for receiving internal grievances is present at the main site office facility which allows for project staff to bring to the attention of the project management team any comments and or concerns.

## 9 ENVIRONMENTAL AWARENESS AND TRAINING

The contractor has undertaken Toolbox talks for the month of June 2025 covering the following topics:

- Ablution on site
- Waste disposal
- Dust Monitoring Plan
- Storage of Hazardous chemical substances
- Refuelling Procedure
- Preventing Water Pollution
- Smoking Policy
- Water usage onsite
- Topsoil & subsoil management
- Chance Find Procedure
- Keep your Environment clean
- Water Conservation
- Importance of vehicle maintenance
- Pumping Water out Excavations
- Report Environmental Incidents



## 10 HERITAGE

In the event of any unknown artefacts being uncovered during construction, the ESCO and Project Manager must be informed immediately who must then instruct work to be stopped in the immediate area and then promptly report the discovery/finding to the ECO, a heritage specialist and the relevant heritage authority to investigate and confirm if such discovery is in fact a heritage artefact of any significance. No activities impacting upon any heritage sites were reported during this reporting period.

## 11 WARNING & NCRS

No NCR reports were issued by the ECO in the month of June.

## 12 REHABILITATION

No rehabilitation works have commenced during this period, further rehabilitation is expected to occur on the project as and when other works have been completed.

## 13 INCIDENTS AND ACCIDENTS

All environmental related events, incidents and accidents are to be reported directly to the ECO and kept on a central register and included in the monthly report. No environmental incidents that are reportable under Section 30 of the NEMA occurred in June 2025. A register of environmental incidents is attached as **Annexure C**.

## 14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 23<sup>rd</sup> of June 2025 with observations documented in this report. Monthly ECO compliance reports are submitted to the Department (DFFE) by the ECO.

## 15 AUDIT METHODOLOGY

This section provides an overview of the methods employed in making observations and providing recommendations and conclusions derived from the audit procedures undertaken.

### 15.1 Audit Process

The site visit, data reviews and report drafting were undertaken by the ECO/auditor. The audit included the following procedures:

- **Site Inspections.** The areas and aspects covered during the inspections with concurrent discussions with the ESCO and site-based representatives of the EA holder included *inter alia*:
  - i. Access control to the sites.
  - ii. Ecologically sensitive areas, where applicable.
  - iii. Waste management.
  - iv. Incident and complaints management.
  - v. Landowner relations.
  - vi. Infrastructure management.
  - vii. Environmental Awareness.
  - viii. Record-keeping and document control.
  - ix. Stormwater and Erosion management
- **Documentation review.** This included:
  - i. A review of the EAs, EMPs and where applicable, method statements.
  - ii. A review of previous audit reports, records, observations, and findings.
  - iii. A review of any remedial and/or protective measures implemented.
  - iv. Identification, if applicable, any gaps requiring action and/or rectification.
- **Audit Report compilation.** This included:
  - i. Recording any observations and findings identified during the audit.
  - ii. Providing recommendations relating to improvement or non-compliance, if and where applicable.

## 15.2 Observation and Recommendation Determination

Observations and subsequent recommendations were based on and are limited to the following:

- i. Available documentation and records viewed or received prior, subsequent, or during the site visit.
- ii. Observations made during the period that the ECO/auditor was on site; and
- iii. Information received from both direct and cross-referenced discussions with permanent site-based staff.

## 15.3 Findings

Any key findings highlighted in this report will indicate areas and/or aspects that require improvement or rectification. The purpose of summarising the findings is to allow the EA holder to identify common management challenges that effect the level of compliance to the conditions of the EAs and EMPs.

Where findings and recommendations pertaining are deemed significant through compliance status or performance, they are documented as specific issues in the report. All site-specific observations are recorded in the corresponding audit checklist tables.

## 15.4 Audit Tables and Compliance Ratings

The audit table captures observations and recommendations made in relation to the conditions stipulated in the EAs and EMPs. It provides the reader with more detailed information in terms of what the stipulated requirements are in relation to the organisation's assessed current compliance status, according to the observations recorded by the auditor.

Ratings are calculated based on a scoring system whereby each auditable condition is provided with a score as highlighted in **Table 4** below.

**Table 4:** Compliance rating and scoring.

| Status                              | Compliance Rating |         | Description                                                                                                                                                                                |
|-------------------------------------|-------------------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | Abbreviation      | Scoring |                                                                                                                                                                                            |
| <i>Compliant</i>                    | C                 | 2       | <i>No improvements required</i>                                                                                                                                                            |
| <i>Partially Compliant</i>          | PC                | 1       | <i>Minor improvements required</i>                                                                                                                                                         |
| <i>Non-Compliant</i>                | NC                | 0       | <i>Major improvements required</i>                                                                                                                                                         |
| <i>Work in Progress</i>             | WiP               | -       | <i>Environmental management measures are underway but not yet fully implemented or verified, requiring further monitoring and assessment.</i>                                              |
| <i>Not Applicable / Not Audited</i> | NA                | -       | <i>No improvements required and / or the condition is either not, not yet or no longer relevant at the time of the audit</i>                                                               |
| <i>Informative</i>                  | info              | -       | <i>These relate to informative elements that provide either useful information or are descriptive in the explanation and understanding of statements or concepts in the audit criteria</i> |

Each condition has been ascribed a colour-coded status indicator of Compliant (green), Partially Compliant (orange), major-compliant (red), Not Auditable/Audited (grey), Work in Progress (light red) and Informative (blank/white) to assist the reader in determining aspects that require attention to improve on compliance achieved, if and where applicable. No compliance scoring is attributed any of the audit criteria information pertaining to the following three audit status symbols, namely 'NA', 'WiP', and 'info' as they were either not auditable and/or were not applicable/relevant at the time the audit was undertaken. In other words, they are excluded from the overall compliance rating calculations.

An overall compliance rating is calculated as a percentage to provide the reader with an overview of compliance to the relevant audit criteria however each condition should be considered on its own merits as the ratings do not necessarily portray the severity or impact of the reported finding relating to a condition.

## 16 ASSUMPTIONS AND LIMITATIONS

The ECO compliance audit and associated report are based upon the assumptions that:

- i. Documentation provided to the ECO/auditor is factual and true.
- ii. The audit is based purely on the conditions as stipulated in the EAs and EMPs.
- iii. The construction phase is currently underway and operational phase activities are not applicable.
- iv. Documentation / reports were randomly sampled / reviewed in order to accommodate time constraints.
- v. Where visual observations were not possible either due to physical access constraints or safety constraints, the ECO/auditor used other means to determine compliance, either through requesting written evidence provided by contractors / service providers who service the site or via interviews with technical site-based staff.

## 17 CONSULTATION PROCESS

The approach of consultation followed during the environmental audit was based on written (email) and telephonic correspondence between the ECO/auditor and the Environmental Site Compliance Officer which also includes consultation and communication with the EA holder and competent authority in terms of report submission.

## 18 FINDINGS

Findings are listed in the attached checklists, and it should be noted that findings should be considered individually in the context of the full audit and each condition and associated rating.

The following findings were noted onsite:

- Clearance of alien vegetation not completed.
- Groundwater has been encountered during monopole excavations.
- Alien vegetation observed on stockpiles.
- Waste is not recycled.
- Some excavated pits had no signage.
- Standing machinery with no drip trays.

Based on the outcomes of the audit it was established that the objectives of the EAs and EMPs were achieved in terms of:

- Sufficiently providing for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis.*
- Ensuring compliance with the provisions of environmental authorisation and EMPs.*

### 18.1 Minor improvements required.

- Waste recycling must be done onsite.

### 18.2 Major improvements required.

- Clearance of all alien vegetation including on stockpiles.
- All standing equipment/vehicles must be equipped with drip trays to prevent oil spillages.
- All excavations must be fitted with deep excavation signs.

## 19 AUDIT SUMMARY

In terms of the findings and results of the **June 2025** ECO audit, the project achieved an overall **98%** compliance rating with the conditions of the EAs and EMPs.

**Table 5: Compliance Scoring**

| No.                                       | Audit criteria                                                                                             | Compliant (C) | Partially Compliant (PC) | Major-non-Compliant (NC) | Work in Progress | Normative (info) | Not Applicable / Not Audited (NA) | Percentage Score      |
|-------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------|--------------------------|--------------------------|------------------|------------------|-----------------------------------|-----------------------|
| 1                                         | Environmental Authorisation for Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)                | 23            | 1                        | 0                        | 1                | 18               | 3                                 | (98%)                 |
| 2                                         | Environmental Authorisation for Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2) | 25            | 1                        | 0                        | 1                | 19               | 3                                 | (98%)                 |
| 3                                         | EMPr Virginia Solar Park OHPL (DFFE REF NO: 14/12/16/3/3/1/2444)                                           | 214           | 6                        | 2                        | 0                | 49               | 58                                | (98%)                 |
| 4                                         | EMPr Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2)                            | 175           | 3                        | 1                        | 0                | 21               | 30                                | (99%)                 |
| Overall total no. conditions              |                                                                                                            | 437           | 11                       | 3                        | 2                | 107              | 94                                |                       |
| Audited conditions                        |                                                                                                            | 874           | 11                       | 0                        | 0                | -                | -                                 | (Potential max score) |
| Overall Compliance Rating Calculation (%) |                                                                                                            | 98%           |                          |                          |                  |                  |                                   |                       |



## 20 RECOMMENDATIONS

**Based on the findings identified the following is recommended:**

- Waste must be recycled onsite.
- Alien vegetation clearance must continue onsite, and the contractor must monitor the cleared areas to prevent reestablishment of alien vegetation.
- All excavation must be fitted with signs.
- Trees with nests must be recorded.
- All trenches must be barricaded at the end of each working day.
- When groundwater is encountered it must be pumped out before concrete is poured.

## 21 CONCLUSION

The contractor must ensure that systems and resources to monitor and manage environmental risks and impacts adequately are in place. Resources and personnel to train employees on the contents of the EMPs must be made to ensure that the project runs effectively and efficiently with minimal impact to the biophysical and socio-economic environment.

In general, the EMPs are effective in their current format in terms of content and relevance and there are no major shortcomings. The EMP's sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with this project.

**PREPARED BY:**

A handwritten signature in black ink, appearing to read 'Sakaunda'.

**Sakaunda Jennipher**

Environmental Control Officer

NCC Operations (Pty) Ltd

**M** ·069 510 7630

**E** · [jenniphers@ncc-group.co.za](mailto:jenniphers@ncc-group.co.za)

**REVIEWED BY:**

A handwritten signature in black ink, appearing to read 'Nick Gates'.

**Nick Gates**

Senior Environmental Consultant

NCC Operations (Pty) Ltd

**M** ·073 1998 431

**E** ·[nickg@ncc-group.co.za](mailto:nickg@ncc-group.co.za)

## ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

### Open Concerns/Complaint

| No | Observation date | Concern/Complaint | Suggested Due Date <sup>1</sup> | Proposed Corrective Action | Status | Closure status |
|----|------------------|-------------------|---------------------------------|----------------------------|--------|----------------|
|    |                  |                   |                                 |                            |        |                |

*\*The concerns register is updated once the ECO is present on site.*

### Closed Concerns

| No | Observation date | Concern/Complaint | Due Date suggested by ECO | Corrective Action Taken | Outcome | Closure status |
|----|------------------|-------------------|---------------------------|-------------------------|---------|----------------|
|    |                  |                   |                           |                         |         |                |
|    |                  |                   |                           |                         |         |                |

## ANNEXURE B - NCR REGISTER

| Ref No. | Originator | Dated Issued | Description | Proposed Corrective Action | Closure Status | Closure Date | Further Action Required |
|---------|------------|--------------|-------------|----------------------------|----------------|--------------|-------------------------|
|         |            |              |             |                            |                |              |                         |

## ANNEXURE C - INCIDENT REGISTER

| Date       | Type                                                                                           | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                       | Volume                                         | Remedial Action                                              |                                                                                 |
|------------|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|--------------------------------------------------------------|---------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna &Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                                                 |                                                | Immediate<br>Corrective<br>Actions                           | Preventative<br>measures                                                        |
| 20/03/2025 | Waste water                                                                                    | Soil pollution                                                                               | On 20, 2025, at approximately 8:28, the conservative tank being used to collect wastewater from conservancy tank had overfilled, and a Spillage had occurred spillage of approximately 8-10 litres of wastewater mixed with the cleaning material. the toilet supplier attended to the spill immediate & initiated spill Clean-up. Contaminated soil was taken to the hazardous waste skip.   | 10 l<br>(below<br>Section<br>30<br>threshold ) | Clean- up must be done as soon as the spills are identified. | The conservancy tank must be emptied more frequently to reduce overfilling.     |
| 19/03/2025 | Waste water                                                                                    | Soil pollution                                                                               | Approximately 12 litres of wastewater mixed with the cleaning chemicals where toilets are located. The toilet had been leaking since the previous day and wastewater was contained in a drip tray. The toilet supplier was notified, and he came to service<br><br>The toilets; however, during servicing; the drip tray spilled over causing the spillage of the wastewater onto the ground. | 12l<br>(below<br>Section<br>30<br>threshold )  | Clean- up must be done as soon as the spills are identified. | Leaking toilets must not be allowed onsite.                                     |
| 08/03/2025 | Diesel spillage                                                                                | Soil pollution                                                                               | On 08 March 2025 at 05:30, security supervisor discovered a diesel leakage during the morning patrol. The spillage occurred due to                                                                                                                                                                                                                                                            | 20l<br>(below<br>Section<br>30                 | Clean- up must be done as soon as the spills are identified  | Vehicles must be maintained regular . only road worthy vehicles must be onsite. |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                 | Volume                                          | Remedial Action                                             |                                                                                |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                           |                                                 | Immediate<br>Corrective<br>Actions                          | Preventative<br>measures                                                       |
|            |                                                                                                 |                                                                                              | the diesel injectors that were loose one of them was not properly fitted and diesel pressure removed them while the bakkie was in motion.                                                                                                                                                                                                                               | <i>threshold</i>                                |                                                             |                                                                                |
| 07/03/2025 | Water and antifreeze                                                                            | Soil pollution                                                                               | The Driver parked the minibus on site, shortly a leak observed containing a mixture of water and antifreeze, while also exhibiting signs of overheating.                                                                                                                                                                                                                | -                                               | Clean- up must be done as soon as the spills are identified | Vehicles must be maintained regular. only road worthy vehicles must be onsite. |
| 06/05/2025 | Water mixed with antifreeze spillage                                                            | Soil pollution                                                                               | On 6 May 2025 at 14:00, the TLB Operator was busy moving spoil material near the access road to the allocated spoil Stockpile area, when the TLB, radiator fan belt snapped & the container that stores water & antifreeze busted. Approximately 5 Liters of water with antifreeze spilled                                                                              | 5 litres<br><i>(below Section 30 threshold)</i> | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.                  |
| 08/05/2025 | Toilet Cleaner mixed with water spillage                                                        | Soil pollution                                                                               | A chemical toilet in PV3 at the laydown area at around 3:53 pm, 08 May 2025 was reported to be leaking, when the toilet was assessed, it was identified that there was a broken pipe that leaked the chemical water. An immediate action was taken to clean up the spillage. The contaminated soil was collected into the bags and taken to site waste management area. | 6 litres<br><i>(below Section 30 threshold)</i> | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent.         |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                   | Volume                                            | Remedial Action                                             |                                                                        |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                             |                                                   | Immediate<br>Corrective<br>Actions                          | Preventative<br>measures                                               |
| 12/05/2025 | Diesel spillage                                                                                 | Soil pollution                                                                               | On 12-05-2025 at 06:40, the ambulance was on the way to the access control point along the main access road, when it had a sudden breakdown and diesel was spilled along the access road, leaving a trail of diesel spill for approximately +400 Metres. Approximately +2 Litres of diesel was spilled                                                                                                                                                    | 2 litres<br>(below<br>Section<br>30<br>threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.          |
| 15/05/2025 | Hydraulic oil spillage                                                                          | Soil pollution                                                                               | On the 15/05/2025, a side tipper truck was transporting spoil material when the cylinder failed and spilled ~7 litres of hydraulic oil, about 455m from the nearest watercourse. The contaminated soil was promptly cleaned up.                                                                                                                                                                                                                           | 7 litres<br>(below<br>Section<br>30<br>threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.          |
| 20/05/2025 | Toilet Cleaner mixed with water spillage                                                        | soil pollution                                                                               | It was around 11:30 am when it was reported that there was a spillage, that when the Fidamo team was about to clean the toilets at Pv1 Laydown area, a pipe from the generator busted and the water leaked from the broken pipe. The water that spilled was approximately 3-4 Liters and the pipe was immediately stopped. The chemical that was in the water is blue splash Toilet chemical. An immediate action was taken to clean up the spillage. The | 4 litres<br>(below<br>Section<br>30<br>threshold) | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                 | Volume                                                                 | Remedial Action                                                                                            |                                                                                                               |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                              |                                                                        | Immediate Corrective Actions                                                                               | Preventative measures                                                                                         |
|            |                                                                                  |                                                                            | contaminated soil was collected into the bags and taken to site waste management area.                                                                                                                                                                                                                                                                                                                                  |                                                                        |                                                                                                            |                                                                                                               |
| 21/05/2025 | Fauna                                                                            | Loss of biodiversity                                                       | On the 21/05/2025 a snake was fatally wounded during the internal road construction works.                                                                                                                                                                                                                                                                                                                              | N/A                                                                    | The dead animal was buried.                                                                                | N/A                                                                                                           |
| 26/05/2025 | Hydraulic oil spillage                                                           | Soil pollution                                                             | On 26/05/2025, at around 16:50 a drill rig operator noticed a leak from the machine, he immediately reported the leak to the supervisor. The supervisor called the mechanic but did not report the spillage. The oil further spilled to the soil during the repair attempts which were done under poor lighting. The spillage was left overnight and was only reported to the EO the next morning when the shift began. | 25 litres<br>(below Section 30 threshold)                              | Clean- up must be done as soon as the spills are identified.                                               | The ESCO issued NCR to the subcontractor for failing to report spillage immediately.                          |
| 11/06/2025 | Concrete and oil Spillage                                                        | Soil pollution                                                             | On the 11 <sup>th</sup> of June 2025 the concrete mixer truck overturned resulting in the spillage of an estimated 3m3 (3 cubic meters) of concrete and approximately 8litres of diesel. The contractor removed the spilled concrete and dumped it on the natural area adjacent to the road                                                                                                                             | 8 litres of diesel and 3m3 of concrete<br>(below Section 30 threshold) | Clean- up must be done as soon as possible and an investigation must be done on the cause of the accident. | The ESCO issued an NCR to the subcontractor for failing to report dumping concrete on the natural vegetation. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                             | Volume                                 | Remedial Action                                                                                     |                                                                                                  |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|-----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                          |                                        | Immediate Corrective Actions                                                                        | Preventative measures                                                                            |
| 16/06/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | At 08:32am, on the 16th of June 2025, The Client (Robin) reported that ABLON's Ablution facilities were leaking which resulted to soil contamination, we immediately stopped everyone from using the Toilet and reported the issue to our service provider. A drip tray was placed immediately underneath the toilet. The event occurred at the OHL Site Camp and the name of the chemical that spilled on the ground is Portabloo Toilet Chemical. | 30 litres (below Section 30 threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 24/06/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | At around 8 am on the 24/06/2025 a spillage was reported by the contractor. Approximately 30 litres of Toilet Blue was spilled at the Virginia 1 laydown area. The spillage was cleaned up and the contaminated soil removed for disposal.                                                                                                                                                                                                          | 30 litres (below Section 30 threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |



## **ANNEXURE D – PHOTOGRAPHS**



**Figure 1:** Incomplete concrete bund for the waste area.



**Figure 2:** Waste Segregation compartments at the waste area.



**Figure 3:** Barricaded excavation along the line.



**Figure 4:** Scrap metal that must be recycled.





**Figure 5:** Diesel buzzer on an impervious surface and hazardous chemical bund.



**Figure 6:** Groundwater that must be pumped out before concrete is poured.

**THIS PAGE WAS INTENTIONALLY LEFT BLANK**



---

# ECO MONTHLY ENVIRONMENTAL MONITORING REPORT

Virginia Photo Voltaic (PV) Solar Facility 1, 2 and 3,  
Matjhabeng, Lejweleputswa District Municipality within  
the jurisdiction of the Free State Province.

---

**PREPARED FOR:**

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

Department of Forestry, Fisheries, and the Environment: Compliance Monitoring

**DATED:**

June 2025

**PREPARED BY:**

NCC Operations

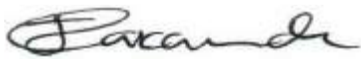
**T** • 021 702 2884

**E** • [info@ncc-group.co.za](mailto:info@ncc-group.co.za)

## DECLARATION OF INDEPENDENCE

I, Jennipher Sakaunda, as duly authorised representative of NCC Operations (Pty) Ltd ("**NCC**"), hereby confirm my independence (as well as that of NCC) as an auditor and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which URSA Energy (Pty) Ltd has appointed NCC as Environmental Control Officer ("**ECO**"), other than fair remuneration for work performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'J Sakaunda', is positioned below the 'Signed:' text.

**Jennipher Sakaunda**

03 July 2025

Environmental Control Officer

NCC Operations (Pty) Ltd

## **LIABILITY DISCLAIMER AND CONFIDENTIALITY CLAUSE**

All inspections conducted, as well as reports and recommendations provided by NCC are purely advisory. They are primarily intended for the purpose of assisting clients in loss control, risk management as well as health, safety, and environmental procedures.

Observations and recommendations are the result of practices and conditions observed, and information made available to us in various forms at the time of our visit. They do not purport to refer to or guarantee compliance with local or government regulations which may be applicable to such practices and conditions. This report should not be considered a definitive listing of all existing risks nor an absolute solution to all indicated risks, or hazards present from time to time in the Client Organisation. The report should always be considered in its entirety; individual sentences, paragraphs or sections of the report should not be used in isolation.

This report should not be reproduced except in its entirety, including this liability disclaimer or contents reproduced or disclosed to any third party without the prior written approval of NCC.

NCC assumes no responsibility for any losses incurred as a result of the implementation, management, and operation of recommended health, safety and environmental systems, processes and procedures.



## DOCUMENT CONTROL

|                     |                                             |
|---------------------|---------------------------------------------|
| <b>REPORT TITLE</b> | Monthly ECO Environmental Monitoring Report |
| <b>PROJECT</b>      | Virginia Solar PV 1, 2, 3                   |
| <b>LOCATION</b>     | Free State Province                         |
| <b>EA HOLDER</b>    | URSA Energy (Pty) Ltd                       |
| <b>ECO</b>          | NCC Operations (Pty) Ltd                    |
| <b>REVISION</b>     | 00                                          |
| <b>DATE</b>         | 03/07/2025                                  |

| Revision | Date       | Description                  |
|----------|------------|------------------------------|
| Rev 00   | 03/07/2025 | First Draft - Internal       |
| Rev 01   | TBC        | Final - Authority submission |

## REPORT DISTRIBUTION LIST

| Name                   | Organisation                      | Issued     | Format     |
|------------------------|-----------------------------------|------------|------------|
| Janine Brasington      | Red Rocket South Africa (Pty) Ltd | 03/07/2025 | Electronic |
| Serina Pillay          | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Maggie Logan           | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Director of Compliance | DFFE                              | TBC        | Electronic |

## TABLE OF CONTENTS

|                                                    |           |
|----------------------------------------------------|-----------|
| <b>TABLE OF FIGURES .....</b>                      | <b>6</b>  |
| <b>ABBREVIATIONS .....</b>                         | <b>8</b>  |
| <b>1 INTRODUCTION .....</b>                        | <b>10</b> |
| 1.1 Background.....                                | 10        |
| 1.2 Audit Scope and Purpose.....                   | 12        |
| 1.3 Monitoring Frequency and Reporting.....        | 12        |
| <b>2 AUDITOR BACKGROUND. ....</b>                  | <b>13</b> |
| <b>3 GENERAL (NOTABLE EVENTS) .....</b>            | <b>14</b> |
| 3.1 General Outstanding matters.....               | 14        |
| 3.2 Audits (Internal and External).....            | 14        |
| <b>4 WASTE MANAGEMENT.....</b>                     | <b>15</b> |
| 4.1 Domestic/ General Waste.....                   | 15        |
| 4.2 Hazardous waste.....                           | 15        |
| 4.3 Wastewater .....                               | 15        |
| <b>5 PROTECTIVE MEASURES .....</b>                 | <b>16</b> |
| 5.1 General .....                                  | 16        |
| <b>6 ENVIRONMENTAL CONSERVATION.....</b>           | <b>17</b> |
| 6.1 Conservation of Flora and Fauna.....           | 17        |
| 6.2 Water Management.....                          | 17        |
| 6.3 Soil Management .....                          | 17        |
| 6.4 Stormwater and Erosion onsite .....            | 17        |
| <b>7 INFRASTRUCTURE MANAGEMENT.....</b>            | <b>18</b> |
| 7.1 Access Roads.....                              | 18        |
| 7.2 Fences, Gates, and Barricading .....           | 18        |
| 7.3 Buildings and Structures .....                 | 18        |
| <b>8 SOCIAL RESPONSIBILITY.....</b>                | <b>18</b> |
| <b>9 ENVIRONMENTAL AWARENESS AND TRAINING.....</b> | <b>19</b> |
| <b>10 HERITAGE.....</b>                            | <b>19</b> |
| <b>11 WARNING &amp; NCRS.....</b>                  | <b>20</b> |

|           |                                                        |           |
|-----------|--------------------------------------------------------|-----------|
| <b>12</b> | <b>REHABILITATION .....</b>                            | <b>20</b> |
| <b>13</b> | <b>INCIDENTS AND ACCIDENTS .....</b>                   | <b>20</b> |
| <b>14</b> | <b>MEETINGS AND OTHER CORRESPONDANCE.....</b>          | <b>20</b> |
| <b>15</b> | <b>AUDIT METHODOLOGY.....</b>                          | <b>21</b> |
| 15.1      | Audit Process.....                                     | 21        |
| 15.2      | Observation and Recommendation Determination.....      | 22        |
| 15.3      | Findings.....                                          | 22        |
| 15.4      | Audit Tables and Compliance Ratings.....               | 22        |
| <b>16</b> | <b>ASSUMPTIONS AND LIMITATIONS .....</b>               | <b>24</b> |
| <b>17</b> | <b>CONSULTATION PROCESS.....</b>                       | <b>24</b> |
| <b>18</b> | <b>FINDINGS .....</b>                                  | <b>25</b> |
| 18.1      | Minor improvements required. ....                      | 25        |
| 18.2      | Major improvements required.....                       | 25        |
| <b>19</b> | <b>AUDIT SUMMARY.....</b>                              | <b>26</b> |
| <b>20</b> | <b>RECOMMENDATIONS .....</b>                           | <b>27</b> |
| <b>21</b> | <b>CONCLUSION.....</b>                                 | <b>27</b> |
|           | <b>ANNEXURE A – CONCERNS/COMPLAINTS REGISTER .....</b> | <b>29</b> |
|           | <b>ANNEXURE B - NCR REGISTER .....</b>                 | <b>29</b> |
|           | <b>ANNEXURE C - INCIDENT REGISTER.....</b>             | <b>30</b> |
|           | <b>ANNEXURE D – PHOTOGRAPHS .....</b>                  | <b>35</b> |

## TABLE OF FIGURES

Figure 1: Oil spillages. ....36

Figure 2: Overgrown alien vegetation.....36

Figure 3: Chemical toilet with no drip Tray underneath.....37

Figure 4: Diesel and Chemical bund under construction .....37

Figure 5: Installed panels .....38

Figure 6: Incomplete concrete bund for the waste area .....38

Figure 7: Waste Segregation compartments at the waste area. ....39

## ABBREVIATIONS

|             |                                                         |
|-------------|---------------------------------------------------------|
| <b>BAR</b>  | Basic Assessment Report                                 |
| <b>CA</b>   | Competent Authority                                     |
| <b>DEA</b>  | Department of Environmental Affairs (now DFFE)          |
| <b>DFFE</b> | Department of Forestry, Fisheries, and the Environment  |
| <b>DWS</b>  | Department of Water and Sanitation                      |
| <b>EA</b>   | Environmental Authorisation                             |
| <b>EAP</b>  | Environmental Assessment Practitioner                   |
| <b>ECO</b>  | Environmental Control Officer                           |
| <b>EIA</b>  | Environmental Impact Assessment                         |
| <b>EMPr</b> | Environmental Management Programme                      |
| <b>EO</b>   | Environmental Officer (Contractor)                      |
| <b>ER</b>   | Employer's Representative                               |
| <b>ESCO</b> | Environmental Site Compliance Officer                   |
| <b>kV</b>   | Kilovolt                                                |
| <b>MVA</b>  | Megavolt Amperes                                        |
| <b>MW</b>   | Megawatt                                                |
| <b>NCC</b>  | NCC Operations                                          |
| <b>NCR</b>  | Non-Compliance Report                                   |
| <b>NEMA</b> | National Environmental Management Act (No. 107 of 1998) |
| <b>NWA</b>  | National Water Act (No. 36 of 1998)                     |

|             |                                 |
|-------------|---------------------------------|
| <b>OHPL</b> | Overhead Power Line             |
| <b>SDC</b>  | Safe Disposal Certificate       |
| <b>SHE</b>  | Safety, Health, and Environment |
| <b>SS</b>   | Substation                      |
| <b>TBC</b>  | To Be Confirmed                 |

# 1 INTRODUCTION

## 1.1 Background

NCC Operations (Pty) Ltd ("**NCC**") was appointed by URSA Energy (Pty) LTD ("**URSA**") to provide a suitably experienced independent Environmental Control Officer ("**ECO**") for the construction phase of Virginia Solar Park which will be connected to the Eskom Theseus Main Transmission Substation (MTS). The site is located on Farm Blomskraal 216, Ventersburg RD located within the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province. On completion the facility will consist of the Photovoltaic (PV) Power Plant with a maximum generation capacity up to 100 MW, a 132kV powerline connecting the substation to the Eskom Theseus substation which is located 16.2 km North-East of the north-western corner of project site.

The ECO has the responsibility of ensuring the mitigation/ rehabilitation measures and conditions referred to in the Environmental Authorisation ("**EA**") are implemented, as well as ensuring compliance with the requirements of the Environmental Management Programme ("**EMPr**"). This report provides an insight into the overall compliance performance and a summary of other environmental concerns and potential environmental risks through observations during site inspections.

This report is based on the following environmental conditions or requirements:

- a) Environmental Authorisations (EA)
  - 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
  - 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
  - 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)
- b) Environmental Management Programmes (EMPr)
- c) Relevant environmental legislation.
- d) All other environmental permits, licenses, and authorisations.

The notification of commencement of construction was submitted to the DFFE for Virginia Solar Plant (Pty) Ltd on the 02 May 2024.

This report addresses conditions set out in the EA which states the ECO as part of their duties: *"The ECO must keep record of all activities on site, problems identified, transgressions noted, and a task schedule of tasks undertaken by the ECO."* As per the roles and responsibilities in the Virginia Solar Project ("**VSP**") EMPr, the primary role of the ECO will be to monitor the construction activities and ensure that the mitigation measures

of the EMPr and Environmental Authorisations (EA) are implemented. This report also includes an audit checklist for the VSP EA as follows:

- 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
- 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
- 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)

A summary of the various environmental requirements i.e. the audit criteria relating to the overall project is provided in **Table 1**.

**Table 1:** Summary of environmental requirements / criteria relating to the overall project.

| Components of overall project | Environmental requirements / criteria |               |                                |          |
|-------------------------------|---------------------------------------|---------------|--------------------------------|----------|
|                               | DFFE EA Ref No.                       | Issue date    | Approved EMPr<br>(Compiled by) | Date     |
| Virginia 1 Solar Park         | 14/12/16/3/3/2/2099/1                 | 20 April 2022 | AGES Limpopo (Pty) Ltd         | Jan 2022 |
| Virginia 2 Solar Park         | 14/12/16/3/3/2/2100                   | 20 May 2022   | AGES Limpopo (Pty) Ltd         | Jan 2022 |
| Virginia 3 Solar Park         | 14/12/16/3/3/2/2101                   | 20 April 2022 | AGES Limpopo (Pty) Ltd         | Feb 2022 |

This report represents the monitoring for the Construction Phase. The responsibility of enforcement of the conditions of the EAs and EMPrs lies with the Project and Project Manager, while the Department of Forestry, Fisheries, and the Environment ("DFFE") Environmental Management Inspectorate ("EMI") may also enforce existing and potentially new conditions through compliance notices.

An Environmental Site Compliance Officer ("ESCO") has been appointed by the holder of the EA to monitor the project compliance onsite on a full-time basis on behalf of the EA holder. The responsibilities of the ESCO includes:

- Monitoring conditions of the Basic Assessment Reports ("BARs"), Environmental Impact Report (EIR) EAs and the EMPrs.
- Ensuring compliance with all relevant environmental legislation.
- Approving method statements (reviewed by the ECO and co-approved by Site Manager).



- Remaining employed until the completion of the construction activities.
- Reporting to the Project Manager, including all findings identified onsite.
- Reporting any significant findings to the ECO.
- Preparing and submitting monthly reports to the ECO and Project Manager.
- Monitoring compliance by the Contractor.

In addition, the ESCO will:

- Undertake daily inspections of the site and surrounding areas.
- Audit compliance with the EMPr and conditions of the environmental authorisation.
- Take appropriate action if the specifications contained in the EMPr and conditions of the environmental authorisation are not followed.
- Monitor and verify that environmental impacts are kept to a minimum, as far as possible; and
- Ensure that activities onsite comply with all relevant environmental legislation.

## 1.2 Audit Scope and Purpose.

In accordance with Regulation 34 of the 2014 NEMA EIA Regulations (as amended) the holder of an environmental authorisation must, for the period during which the EA and EMPr, and where applicable the closure plan, remain valid —

- Ensure that the compliance with the conditions of the EA and the EMPr, and where applicable the closure plan, is audited; and*
- Submit an environmental audit report to the relevant competent authority.*

The purpose of this environmental audit is to verify compliance to the overarching environmental requirements specified as conditions of the EAs and EMPrs, and report on the extent to which the objectives of the EMPrs and are being achieved.

## 1.3 Monitoring Frequency and Reporting.

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 23<sup>rd</sup> of June 2025 after which this report was compiled which serves to document and audit. This report covers the monthly reporting for the month of June 2025.

## 2 AUDITOR BACKGROUND.

NCC is a multi-disciplinary environmental consulting company based in South Africa which adopts a 'values driven' approach with a common purpose to conserve and create sustainable environments that enable people, planet and business to thrive. We are a trusted partner to major engineering and construction firms, mines, parastatals, film, sports and event production companies, municipalities, provincial and national government, and conservation organisations. Drawing on our years of experience on a wide range of projects, NCC works with our clients to develop, implement, and monitor customised services that add real value.

The auditor, Jennipher Sakaunda, is a senior environmental manager with more than 14 years' experience currently employed with NCC. Jennipher Sakaunda has experience in several environmental fields including environmental compliance monitoring and auditing, due diligence assessment, environmental impact and risk assessment, and compilation of environmental management plans/programmes.

**Table 2:** Details of the auditor.

|                       |                                                                                                                                                                                                |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Company</b>        | NCC Operations (Pty) Ltd                                                                                                                                                                       |
| <b>Auditor</b>        | Jennipher Sakaunda                                                                                                                                                                             |
| <b>Tel</b>            | +27 21 702 2884                                                                                                                                                                                |
| <b>Mobile</b>         | +27 69 510 7630                                                                                                                                                                                |
| <b>Email</b>          | <a href="mailto:jenniphers@ncc-group.co.za">jenniphers@ncc-group.co.za</a>                                                                                                                     |
| <b>Address</b>        | 26 Bell Close, Westlake Business Park Westlake, 7945                                                                                                                                           |
| <b>Affiliation</b>    | International Association of Impact Assessment South Africa.<br>Environmental Assessment Practitioner Association of South Africa.<br>South African Council of Natural Scientific Professions. |
| <b>Qualifications</b> | BSc (honors) Environmental Management                                                                                                                                                          |
| <b>Expertise</b>      | A detailed CV can be provided on request.                                                                                                                                                      |

### 3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (June 2025) included the following:

- Site establishment for the offsite laydown area.
- Construction of the internal road connecting the access road to the Temporary Site Offices (TSF)
- Fencing.
- Clearing and grubbing of PV area and levelling works.
- Drilling and pile installations.
- Reworking of the rain damaged portions of the access road.
- Construction of the temporary stormwater berm.
- Site Establishment.
- Installation of Solar Panels.

#### 3.1 General Outstanding matters

Any major outstanding matters are to be recorded and summarised in the Concerns Register (**Annexure A**). The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

#### 3.2 Audits (Internal and External)

Internal audits are undertaken monthly by the Red Rocket ESCO. This ECO Audit was undertaken on the 23<sup>rd</sup> of June 2025. Audit tables/checklists are attached to this report. The ECO undertakes external monthly audits.

## 4 WASTE MANAGEMENT

The contractor must make provision for waste avoidance, minimisation, and separation of waste where possible through recycling efforts. Waste management awareness must be done on an ongoing basis and must be provided through toolbox talks and awareness posters. A waste station is under construction at V3 where waste will be temporarily stored, stored and recycled. The waste station includes a bund where hazardous waste will be stored and various compartments where waste will be sorted into. The contractor must ensure that the waste area has a roof to protect waste from weather elements. Additionally, the compartments must be on an impervious surface. The EMP requires waste to be recycled, and the contractor is finalising the appointment of a service provider.

### 4.1 Domestic/ General Waste

Approximately **490 kg** of general waste was removed from site in the month of June 2025. Designated waste areas have been provided at the contractors' main site offices/laydown areas for purposes of temporary storage of waste prior to collection and transfer to the licensed waste facilities. Bins at the laydown area are colour coded for each waste type. No waste material from the site was recycled this month. It is critical to dispose all the stockpiled cleared alien vegetation before the alien vegetation establishes again.

The service providers dispose the general waste at Matjhabeng Local Municipality waste disposal site-Licence number: B33/2/340/21/P8 16/2/7/C404/D2/Z1/P367. Proof of disposal is available on request.

### 4.2 Hazardous waste

Hazardous waste skips are available at the dedicated waste storage area at each of the sub-contractors' site offices/lay down areas. Approximately **4780 kg** of hazardous waste was disposed of in June 2025 at Vlakfontein which is a registered hazardous landfill site. Hazardous waste in form of oil spillages, cement spillages and contaminated soil is kept onsite until there is enough to dispose.

### 4.3 Wastewater

Approximately **54 850.3 L** of sewerage waste was generated on site in the month of June 2025. Chemical toilets and a conservancy tank have been provided onsite. Several incidents' spillages from the chemical toilets have been recorded, the contractor must ensure these chemical toilets are serviced regularly and drip trays are placed under each toilet.

The General Authorisation that was issued by DWS for the includes the use of a conservancy tank up to a capacity of 50 000l. The conservancy tank onsite has a capacity of 12 500l which is below the stipulated GA threshold. The contractor must ensure that this capacity is not exceeded.

The Appointed Service Provider removes sewage and disposes of it at Matjhabeng Local Municipality wastewater treatment facility - Licence No: 10/D4/J/G/2082. Proof of disposal is available onsite. The contractor must ensure the appointed service provider is licenced to provide sewer removal services. Additionally, adequate ablution facilities must be always provided.

## 5 PROTECTIVE MEASURES

### 5.1 General

Protective measures have been deployed to mitigate environmental impacts or prevent impacts from occurring which includes:

- Security guards are present on the site, with access control in place.
- Induction training is conducted for all persons working and visiting the site.
- Snake gaiters are provided.
- Spill kits are available on site.
- No-go areas are demarcated and provided with signage.
- Access cards are used to enter and exit the site.
- Rapid alcohol detecting is in place.

## 6 ENVIRONMENTAL CONSERVATION

### 6.1 Conservation of Flora and Fauna

A permit to clear the site and relocate species of concern was received from the Free state Department of Economic, Small Business Development, Tourism and Environmental Affairs. The permit with Ref No. 202306000012649 was issued on 08/06/2023 to pluck protected and unprotected flora.

Clearance of alien vegetation that had established on the fields has continues; however, no clearance work has been done on the stockpiles. It is important that the contractor removes all the alien vegetation onsite as that alien are drying and will soon disperse seeds. This will create a seed bank for the alien plants. The contractor must monitor the cleared areas to ensure alien vegetation does not re-establish. The contractor must dispose the cleared alien vegetation must be disposed at the Matjhabeng and fill site before the aliens re-stablish. Excess topsoil that will be temporary moved near the main gate area must be inspected for weeds before being moved. When clearing vegetation to establish a stockpile for excess topsoil trees of 2m and higher in height must not be cut.

### 6.2 Water Management

Approximately **834 m<sup>3</sup>** of water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The GA allows for abstraction of 43 000m<sup>3</sup> annually, the contractor must ensure water abstraction does not exceed the licenced volumes. Tanks and pipes must be monitored on an ongoing basis

### 6.3 Soil Management

Cleared topsoil must be protected from erosion and alien vegetation establishment Alien vegetation has established on the stockpiles and must be cleared. Excess topsoil that will be temporary moved near the main gate area must be inspected for weeds before being moved. Additionally, the contractor must ensure measures have been put in place to prevent erosion, the stockpile height does not exceed 2m and the stockpiles slopes are gentle.

### 6.4 Stormwater and Erosion onsite

The contractor's Stormwater Management Plan was approved, measures to manage erosion as per the approved SWMP have been implemented to prevent erosion and water ponding. More drains have been opened to prevent water ponding, and berms have been placed on the access roads to prevent them from being eroded. The contractor is also repairing areas that were damaged with rain on the access roads. Measures diverted clean stormwater away from the works towards the watercourses must be implemented.

## **7 INFRASTRUCTURE MANAGEMENT**

### **7.1 Access Roads**

The project team is using existing farm roads for current construction activities until such time as the project access roads and internal roads have been constructed. The contractor has commenced with the regrading of the access roads to address the effects water ponding and erosion. Road maintenance must be done on a regular basis.

### **7.2 Fences, Gates, and Barricading**

The site is fenced with security personnel manning the gates. Access cards are used to allow entrance to site. Barricading was observed on site, and such should continue to be maintained around all open excavations to prevent potential fauna (wildlife and livestock) incidents.

### **7.3 Buildings and Structures**

Containers have been established on site by various subcontractors that are being used as offices. Male and female ablation facilities have been provided. Chemical toilets and a conservancy tank are used to manage sewer onsite. The contractor has commenced with the construction of a diesel and chemical bund on V2 area. The contractor must ensure the bund meets the requirements such as ventilation and capacity as outlined in the EMPr. A waste station is currently being established at V3. The waste station constitutes of a bunded areas for the storage of hazardous waste and varies compartments where waste will be segregated into.

## **8 SOCIAL RESPONSIBILITY**

Any complaints from the public are to be recorded on complaints register maintained by the Contractor whose responsibility it is to track and resolve the complaints/issues that are raised. In addition, a box for receiving internal grievances is present at the main site office facility which allows for project staff to bring to the attention of the project management team any comments and or concerns.

## 9 ENVIRONMENTAL AWARENESS AND TRAINING

The contractor has undertaken Toolbox talks for the month of June 2025 covering the following topics:

- Ablution on site
- Waste disposal
- Dust Monitoring Plan
- Storage of Hazardous chemical substances
- Refuelling Procedure
- Preventing Water Pollution
- Smoking Policy
- Water usage onsite
- Topsoil & subsoil management
- Chance Find Procedure
- Smoking in the workplace
- Keep your Environment clean
- Water Conservation
- Importance of vehicle maintenance
- Pumping Water out Excavations
- Report Environmental Incidents

## 10 HERITAGE

In the event of any unknown artefacts being uncovered during construction, the ESCO and Project Manager must be informed immediately who must then instruct work to be stopped in the immediate area and then promptly report the discovery/finding to the ECO, a heritage specialist and the relevant heritage authority to investigate and confirm if such discovery is in fact a heritage artefact of any significance. No activities impacting upon any heritage sites were reported during this reporting period.

The place identified to temporary store excess material is close to the identified graves. The contractor must ensure the graves are barricaded and a 50m buffer is left between the stockpile and the graves.



## 11 WARNING & NCRS

No NCR reports were issued by the ECO in the month of June.

## 12 REHABILITATION

No rehabilitation works have commenced during this period, further rehabilitation is expected to occur on the project as and when other works have been completed.

## 13 INCIDENTS AND ACCIDENTS

All environmental related events, incidents and accidents are to be reported directly to the ECO and kept on a central register and included in the monthly report. No environmental incidents that are reportable under Section 30 of the NEMA occurred in June 2025. A register of environmental incidents is attached as **Annexure C**.

## 14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 23<sup>rd</sup> of June 2025 with observations documented in this report. Monthly ECO compliance reports are submitted to the Department (**DFFE**) by the ECO.

## 15 AUDIT METHODOLOGY

This section provides an overview of the methods employed in making observations and providing recommendations and conclusions derived from the audit procedures undertaken.

### 15.1 Audit Process

The site visit, data reviews and report drafting were undertaken by the ECO/auditor. The audit included the following procedures:

- **Site Inspections.** The areas and aspects covered during the inspections with concurrent discussions with the ESCO and site-based representatives of the EA holder included *inter alia*:
  - i. Access control to the sites.
  - ii. Ecologically sensitive areas, where applicable.
  - iii. Waste management.
  - iv. Incident and complaints management.
  - v. Landowner relations.
  - vi. Infrastructure management.
  - vii. Environmental Awareness.
  - viii. Record-keeping and document control.
  - ix. Stormwater and Erosion management
- **Documentation review.** This included:
  - i. A review of the EAs, EMPs and where applicable, method statements.
  - ii. A review of previous audit reports, records, observations, and findings.
  - iii. A review of any remedial and/or protective measures implemented.
  - iv. Identification, if applicable, any gaps requiring action and/or rectification.
- **Audit Report compilation.** This included:
  - i. Recording any observations and findings identified during the audit.
  - ii. Providing recommendations relating to improvement or non-compliance, if and where applicable.

## 15.2 Observation and Recommendation Determination

Observations and subsequent recommendations were based on and are limited to the following:

- i. Available documentation and records viewed or received prior, subsequent, or during the site visit.
- ii. Observations made during the period that the ECO/auditor was on site; and
- iii. Information received from both direct and cross-referenced discussions with permanent site-based staff.

## 15.3 Findings

Any key findings highlighted in this report will indicate areas and/or aspects that require improvement or rectification. The purpose of summarising the findings is to allow the EA holder to identify common management challenges that effect the level of compliance to the conditions of the EAs and EMPrs.

Where findings and recommendations pertaining are deemed significant through compliance status or performance, they are documented as specific issues in the report. All site-specific observations are recorded in the corresponding audit checklist tables.

## 15.4 Audit Tables and Compliance Ratings

The audit table captures observations and recommendations made in relation to the conditions stipulated in the EAs and EMPrs. It provides the reader with more detailed information in terms of what the stipulated requirements are in relation to the organisation's assessed current compliance status, according to the observations recorded by the auditor.

Ratings are calculated based on a scoring system whereby each auditable condition is provided with a score as highlighted in **Table 3** below.

**Table 4:** Compliance rating and scoring.

| Status                              | Compliance Rating |         | Description                                                                                                                                                                                |
|-------------------------------------|-------------------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | Abbreviation      | Scoring |                                                                                                                                                                                            |
| <i>Compliant</i>                    | C                 | 2       | <i>No improvements required</i>                                                                                                                                                            |
| <i>Partially Compliant</i>          | PC                | 1       | <i>Minor improvements required</i>                                                                                                                                                         |
| <i>Non-Compliant</i>                | NC                | 0       | <i>Major improvements required</i>                                                                                                                                                         |
| <i>Work in Progress</i>             | WiP               | -       | <i>Environmental management measures are underway but not yet fully implemented or verified, requiring further monitoring and assessment.</i>                                              |
| <i>Not Applicable / Not Audited</i> | NA                | -       | <i>No improvements required and / or the condition is either not, not yet or no longer relevant at the time of the audit</i>                                                               |
| <i>Informative</i>                  | info              | -       | <i>These relate to informative elements that provide either useful information or are descriptive in the explanation and understanding of statements or concepts in the audit criteria</i> |

Each condition has been ascribed a colour-coded status indicator of Compliant (green), Partially Compliant (orange), major-compliant (red), Not Auditable/Audited (grey), Work in Progress (light red) and Informative (blank/white) to assist the reader in determining aspects that require attention to improve on compliance achieved, if and where applicable. No compliance scoring is attributed any of the audit criteria information pertaining to the following three audit status symbols, namely 'NA', 'WiP', and 'info' as they were either not auditable and/or were not applicable/relevant at the time the audit was undertaken. In other words, they are excluded from the overall compliance rating calculations.

An overall compliance rating is calculated as a percentage to provide the reader with an overview of compliance to the relevant audit criteria however each condition should be considered on its own merits as the ratings do not necessarily portray the severity or impact of the reported finding relating to a condition.

## 16 ASSUMPTIONS AND LIMITATIONS

The ECO compliance audit and associated report are based upon the assumptions that:

- i. Documentation provided to the ECO/auditor is factual and true.
- ii. The audit is based purely on the conditions as stipulated in the EAs and EMPs.
- iii. The construction phase is currently underway and operational phase activities are not applicable.
- iv. Documentation / reports were randomly sampled / reviewed in order to accommodate time constraints.
- v. Where visual observations were not possible either due to physical access constraints or safety constraints, the ECO/auditor used other means to determine compliance, either through requesting written evidence provided by contractors / service providers who service the site or via interviews with technical site-based staff.

## 17 CONSULTATION PROCESS

The approach of consultation followed during the environmental audit was based on written (email) and telephonic correspondence between the ECO/auditor and the Environmental Site Compliance Officer which also includes consultation and communication with the EA holder and competent authority in terms of report submission.

## 18 FINDINGS

Findings are listed in the attached checklists, and it should be noted that findings should be considered individually in the context of the full audit and each condition and associated rating.

The following findings were noted onsite:

- Clearance of alien vegetation partly done on the fields.
- Clearance of alien vegetation not yet done on stockpiles
- Some standing equipment did not have drip trays
- Alien vegetation was observed on stockpiles.
- Waste is not recycled.
- Oil spillages were observed.
- The contractor commenced with grading the rain damaged access roads.
- Several spillages were recorded onsite.

Based on the outcomes of the audit it was established that the objectives of the EAs and EMPs were achieved in terms of:

- i. *Sufficiently providing for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis.*
- ii. *Ensuring compliance with the provisions of environmental authorisation and EMPs.*

### 18.1 Minor improvements required.

- Waste recycling must be done onsite.

### 18.2 Major improvements required.

- Maintenance of access roads.
- Clearance of all alien vegetation including on stockpiles.
- Vehicle, equipment and chemical toilets maintenance and servicing must be done to prevent spillages.
- All chemical toilets and equipment must be equipped with a drip tray.

## 19 AUDIT SUMMARY

In terms of the findings and results of the **June 2025** ECO audit, the project achieved an overall **97.6%** compliance rating with the conditions of the EAs and EMPs.

**Table 4:** Compliance Scoring

| No.                                       | Audit criteria                                                                             | Compliant (C) | Partially Compliant (PC) | Major-non-Compliant (NC) | Work in Progress | Normative (info) | Not Applicable / Not Audited (NA) | Percentage Score      |
|-------------------------------------------|--------------------------------------------------------------------------------------------|---------------|--------------------------|--------------------------|------------------|------------------|-----------------------------------|-----------------------|
| 1                                         | Environmental Authorisation for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1) | 24            | 1                        | 0                        | 1                | 19               | 3                                 | (98%)                 |
| 2                                         | Environmental Authorisation for Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)   | 24            | 1                        | 0                        | 1                | 20               | 2                                 | (98%)                 |
| 3                                         | Environmental Authorisation for Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)   | 24            | 1                        | 0                        | 1                | 20               | 2                                 | (98%)                 |
| 4                                         | EMPr for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)                        | 261           | 10                       | 2                        | 0                | 14               | 33                                | (97%)                 |
| 5                                         | EMPr Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)                              | 256           | 10                       | 2                        | 0                | 18               | 34                                | (97%)                 |
| 6                                         | EMPr Virginia 3 Solar Park (DFFE REF NO: 14/12/16/3/3/2/2101)                              | 228           | 112                      | 2                        | 0                | 42               | 39                                | (96%)                 |
| Overall total no. conditions              |                                                                                            | 817           | 35                       | 6                        | 3                | 133              | 113                               |                       |
| Audited conditions                        |                                                                                            | 1634          | 35                       | 0                        | -                | -                | -                                 | (Potential max score) |
| Overall Compliance Rating Calculation (%) |                                                                                            | 97.59%        |                          |                          |                  |                  |                                   |                       |

## 20 . RECOMMENDATIONS

**Based on the findings identified the following is recommended:**

- Alien vegetation clearance must continue onsite, and the contractor must monitor the cleared areas to prevent reestablishment of alien vegetation.
- All trenches must be barricaded at the end of each working day.
- All equipment must be equipped with a drip tray.
- Access roads must be maintained regularly
- Spillages must be cleaned promptly
- Only roadworthy vehicles and equipment must enter site.

## 21 CONCLUSION

The contractor must ensure that systems and resources to monitor and manage environmental risks and impacts adequately are in place. Resources and personnel to train employees on the contents of the EMPs must be made to ensure that the project runs effectively and efficiently with minimal impact to the biophysical and socio-economic environment.

In general, the EMPs are effective in their current format in terms of content and relevance and there are no major shortcomings. The EMP's sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with this project.



**PREPARED BY:**

A handwritten signature in black ink, appearing to read 'Sakaunda'.

**Sakaunda Jennipher**

Environmental Control Officer

NCC Operations (Pty) Ltd

**M** ·069 510 7630

**E** · [jenniphers@ncc-group.co.za](mailto:jenniphers@ncc-group.co.za)

**REVIEWED BY:**

A handwritten signature in black ink, appearing to read 'Nick Gates'.

**Nick Gates**

Senior Environmental Consultant

NCC Operations (Pty) Ltd

**M** ·073 1998 431

**E** ·[nickg@ncc-group.co.za](mailto:nickg@ncc-group.co.za)

## ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

### Open Concerns/Complaint

| No | Observation date | Concern/Complaint | Suggested Due Date <sup>1</sup> | Proposed Corrective Action | Status | Closure status |
|----|------------------|-------------------|---------------------------------|----------------------------|--------|----------------|
|    |                  |                   |                                 |                            |        |                |

*\*The concerns register is updated once the ECO is present on site.*

### Closed Concerns

| No | Observation date | Concern/Complaint | Due Date suggested by ECO | Corrective Action Taken | Outcome | Closure status |
|----|------------------|-------------------|---------------------------|-------------------------|---------|----------------|
|    |                  |                   |                           |                         |         |                |
|    |                  |                   |                           |                         |         |                |

## ANNEXURE B - NCR REGISTER

| Ref No. | Originator | Dated Issued | Description | Proposed Corrective Action | Closure Status | Closure Date | Further Action Required |
|---------|------------|--------------|-------------|----------------------------|----------------|--------------|-------------------------|
|         |            |              |             |                            |                |              |                         |

## ANNEXURE C - INCIDENT REGISTER

| Date       | Type                                                                                           | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                       | Volume                                         | Remedial Action                                              |                                                                                |
|------------|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna &Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                                                 |                                                | Immediate<br>Corrective<br>Actions                           | Preventative<br>measures                                                       |
| 20/03/2025 | Waste water                                                                                    | Soil pollution                                                                               | On 20, 2025, at approximately 8:28, the conservative tank being used to collect wastewater from conservancy tank had overfilled, and a Spillage had occurred spillage of approximately 8-10 litres of wastewater mixed with the cleaning material. the toilet supplier attended to the spill immediate & initiated spill Clean-up. Contaminated soil was taken to the hazardous waste skip.   | 10 l<br>(below<br>Section<br>30<br>threshold ) | Clean- up must be done as soon as the spills are identified. | The conservancy tank must be emptied more frequently to reduce overfilling.    |
| 19/03/2025 | Waste water                                                                                    | Soil pollution                                                                               | Approximately 12 litres of wastewater mixed with the cleaning chemicals where toilets are located. The toilet had been leaking since the previous day and wastewater was contained in a drip tray. The toilet supplier was notified, and he came to service<br><br>The toilets; however, during servicing; the drip tray spilled over causing the spillage of the wastewater onto the ground. | 12l<br>(below<br>Section<br>30<br>threshold )  | Clean- up must be done as soon as the spills are identified. | Leaking toilets must not be allowed onsite.                                    |
| 08/03/2025 | Diesel spillage                                                                                | Soil pollution                                                                               | On 08 March 2025 at 05:30, security supervisor discovered a diesel leakage during the morning patrol. The spillage occurred due to the diesel injectors that were                                                                                                                                                                                                                             | 20l<br>(below<br>Section<br>30<br>threshold )  | Clean- up must be done as soon as the spills are identified  | Vehicles must be maintained regular. only road worthy vehicles must be onsite. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                 | Volume                                   | Remedial Action                                             |                                                                                |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                              |                                          | Immediate Corrective Actions                                | Preventative measures                                                          |
|            |                                                                                  |                                                                            | loose one of them was not properly fitted and diesel pressure removed them while the bakkie was in motion.                                                                                                                                                                                                                                                              |                                          |                                                             |                                                                                |
| 07/03/2025 | Water and antifreeze                                                             | Soil pollution                                                             | The Driver parked the minibus on site, shortly a leak observed containing a mixture of water and antifreeze, while also exhibiting signs of overheating.                                                                                                                                                                                                                | -                                        | Clean- up must be done as soon as the spills are identified | Vehicles must be maintained regular. only road worthy vehicles must be onsite. |
| 06/05/2025 | Water mixed with antifreeze spillage                                             | Soil pollution                                                             | On 6 May 2025 at 14:00, the TLB Operator was busy moving spoil material near the access road to the allocated spoil Stockpile area, when the TLB, radiator fan belt snapped & the container that stores water & antifreeze busted. Approximately 5 Liters of water with antifreeze spilled                                                                              | 5 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.                  |
| 08/05/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | A chemical toilet in PV3 at the laydown area at around 3:53 pm, 08 May 2025 was reported to be leaking, when the toilet was assessed, it was identified that there was a broken pipe that leaked the chemical water. An immediate action was taken to clean up the spillage. The contaminated soil was collected into the bags and taken to site waste management area. | 6 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent.         |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                   | Volume                                   | Remedial Action                                             |                                                                        |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                |                                          | Immediate Corrective Actions                                | Preventative measures                                                  |
| 12/05/2025 | Diesel spillage                                                                  | Soil pollution                                                             | On 12-05-2025 at 06:40, the ambulance was on the way to the access control point along the main access road, when it had a sudden breakdown and diesel was spilled along the access road, leaving a trail of diesel spill for approximately +400 Metres. Approximately +2 Litres of diesel was spilled                                                                                                                                                    | 2 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.          |
| 15/05/2025 | Hydraulic oil spillage                                                           | Soil pollution                                                             | On the 15/05/2025, a side tipper truck was transporting spoil material when the cylinder failed and spilled ~7 litres of hydraulic oil, about 455m from the nearest watercourse. The contaminated soil was promptly cleaned up.                                                                                                                                                                                                                           | 7 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.          |
| 20/05/2025 | Toilet Cleaner mixed with water spillage                                         | soil pollution                                                             | It was around 11:30 am when it was reported that there was a spillage, that when the Fidamo team was about to clean the toilets at Pv1 Laydown area, a pipe from the generator busted and the water leaked from the broken pipe. The water that spilled was approximately 3-4 Liters and the pipe was immediately stopped. The chemical that was in the water is blue splash Toilet chemical. An immediate action was taken to clean up the spillage. The | 4 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                 | Volume                                                                 | Remedial Action                                                                                            |                                                                                                               |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                              |                                                                        | Immediate Corrective Actions                                                                               | Preventative measures                                                                                         |
|            |                                                                                  |                                                                            | contaminated soil was collected into the bags and taken to site waste management area.                                                                                                                                                                                                                                                                                                                                  |                                                                        |                                                                                                            |                                                                                                               |
| 21/05/2025 | Fauna                                                                            | Loss of biodiversity                                                       | On the 21/05/2025 a snake was fatally wounded during the internal road construction works.                                                                                                                                                                                                                                                                                                                              | N/A                                                                    | The dead animal was buried.                                                                                | N/A                                                                                                           |
| 26/05/2025 | Hydraulic oil spillage                                                           | Soil pollution                                                             | On 26/05/2025, at around 16:50 a drill rig operator noticed a leak from the machine, he immediately reported the leak to the supervisor. The supervisor called the mechanic but did not report the spillage. The oil further spilled to the soil during the repair attempts which were done under poor lighting. The spillage was left overnight and was only reported to the EO the next morning when the shift began. | 25 litres<br>(below Section 30 threshold)                              | Clean- up must be done as soon as the spills are identified.                                               | The ESCO issued NCR to the subcontractor for failing to report spillage immediately.                          |
| 11/06/2025 | Concrete and oil Spillage                                                        | Soil pollution                                                             | On the 11 <sup>th</sup> of June 2025 the concrete mixer truck overturned resulting in the spillage of an estimated 3m3 (3 cubic meters) of concrete and approximately 8litres of diesel. The contractor removed the spilled concrete and dumped it on the natural area adjacent to the road                                                                                                                             | 8 litres of diesel and 3m3 of concrete<br>(below Section 30 threshold) | Clean- up must be done as soon as possible and an investigation must be done on the cause of the accident. | The ESCO issued an NCR to the subcontractor for failing to report dumping concrete on the natural vegetation. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                             | Volume                                    | Remedial Action                                                                                     |                                                                                                  |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|-----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                          |                                           | Immediate Corrective Actions                                                                        | Preventative measures                                                                            |
| 16/06/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | At 08:32am, on the 16th of June 2025, The Client (Robin) reported that ABLON's Ablution facilities were leaking which resulted to soil contamination, we immediately stopped everyone from using the Toilet and reported the issue to our service provider. A drip tray was placed immediately underneath the toilet. The event occurred at the OHL Site Camp and the name of the chemical that spilled on the ground is Portabloo Toilet Chemical. | 30 litres<br>(below Section 30 threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 24/06/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | At around 8 am on the 24/06/2025 a spillage was reported by the contractor. Approximately 30 litres of Toilet Blue was spilled at the Virginia 1 laydown area. The spillage was cleaned up and the contaminated soil removed for disposal.                                                                                                                                                                                                          | 30 litres<br>(below Section 30 threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |

## ANNEXURE D – PHOTOGRAPHS





**Figure 1:** Oil spillages.



**Figure 2:** Overgrown alien vegetation



**Figure 3:** Chemical toilet with no drip Tray underneath.



**Figure 4:** Diesel and Chemical bund under construction





**Figure 5:** Installed panels



**Figure 6:** Incomplete concrete bund for the waste area



**Figure 7:** Waste Segregation compartments at the waste area.

**This Page was intentionally left Blank**

**JULY 2025**



---

# ECO MONTHLY ENVIRONMENTAL MONITORING REPORT

Virginia OHL Line and Switching Station Matjhabeng,  
Lejweleputswa District Municipality within the jurisdiction  
of the Free State Province.

---

**PREPARED FOR:**

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

Department of Forestry, Fisheries, and the Environment: Compliance Monitoring

**DATED:**

July 2025

**PREPARED BY:**

NCC Operations

T • 021 702 2884

E • [info@ncc-group.co.za](mailto:info@ncc-group.co.za)

## DECLARATION OF INDEPENDENCE

I, Jennifer Sakaunda, as duly authorised representative of NCC Operations (Pty) Ltd ("**NCC**"), hereby confirm my independence (as well as that of NCC) as an auditor and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which URSA Energy (Pty) Ltd has appointed NCC as Environmental Control Officer ("**ECO**"), other than fair remuneration for work performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'Sakaunda', is positioned below the 'Signed:' text.

**Jennifer Sakaunda**

05 August 2025

Environmental Control Officer

NCC Operations (Pty) Ltd



## **LIABILITY DISCLAIMER AND CONFIDENTIALITY CLAUSE**

All inspections conducted, as well as reports and recommendations provided by NCC are purely advisory. They are primarily intended for the purpose of assisting clients in loss control, risk management as well as health, safety, and environmental procedures.

Observations and recommendations are the result of practices and conditions observed, and information made available to us in various forms at the time of our visit. They do not purport to refer to or guarantee compliance with local or government regulations which may be applicable to such practices and conditions. This report should not be considered a definitive listing of all existing risks nor an absolute solution to all indicated risks, or hazards present from time to time in the Client Organisation. The report should always be considered in its entirety; individual sentences, paragraphs or sections of the report should not be used in isolation.

This report should not be reproduced except in its entirety, including this liability disclaimer or contents reproduced or disclosed to any third party without the prior written approval of NCC.

NCC assumes no responsibility for any losses incurred as a result of the implementation, management, and operation of recommended health, safety and environmental systems, processes and procedures.

## DOCUMENT CONTROL

|                     |                                             |
|---------------------|---------------------------------------------|
| <b>REPORT TITLE</b> | Monthly ECO Environmental Monitoring Report |
| <b>PROJECT</b>      | Virginia OPL Line and Switching Station     |
| <b>LOCATION</b>     | Free State Province                         |
| <b>EA HOLDER</b>    | URSA Energy (Pty) Ltd                       |
| <b>ECO</b>          | NCC Operations (Pty) Ltd                    |
| <b>REVISION</b>     | 00                                          |
| <b>DATE</b>         | 05/08/2025                                  |

| Revision | Date       | Description                  |
|----------|------------|------------------------------|
| Rev 00   | 05/08/2025 | First Draft - Internal       |
| Rev 01   | TBC        | Final - Authority submission |

## REPORT DISTRIBUTION LIST

| Name                   | Organisation                      | Issued     | Format     |
|------------------------|-----------------------------------|------------|------------|
| Janine Brasington      | Red Rocket South Africa (Pty) Ltd | 05/08/2025 | Electronic |
| Serina Pillay          | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Maggie Logan           | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Director of Compliance | DFFE                              | TBC        | Electronic |

## TABLE OF CONTENTS

|                                                    |           |
|----------------------------------------------------|-----------|
| <b>TABLE OF FIGURES .....</b>                      | <b>7</b>  |
| <b>ABBREVIATIONS .....</b>                         | <b>8</b>  |
| <b>1 INTRODUCTION .....</b>                        | <b>10</b> |
| 1.1 Background.....                                | 10        |
| 1.2 Audit Scope and Purpose.....                   | 12        |
| 1.3 Monitoring Frequency and Reporting.....        | 12        |
| <b>2 AUDITOR BACKGROUND.....</b>                   | <b>13</b> |
| <b>3 GENERAL (NOTABLE EVENTS) .....</b>            | <b>14</b> |
| 3.1 General Outstanding matters.....               | 14        |
| 3.2 Audits (Internal and External).....            | 14        |
| <b>4 WASTE MANAGEMENT.....</b>                     | <b>15</b> |
| 4.1 Domestic/ General Waste.....                   | 15        |
| 4.2 Hazardous waste.....                           | 15        |
| 4.3 Wastewater .....                               | 16        |
| <b>5 PROTECTIVE MEASURES .....</b>                 | <b>16</b> |
| 5.1 General .....                                  | 16        |
| <b>6 ENVIRONMENTAL CONSERVATION.....</b>           | <b>17</b> |
| 6.1 Conservation of Flora and Fauna.....           | 17        |
| 6.2 Water Management.....                          | 17        |
| 6.3 Soil Management .....                          | 17        |
| 6.4 Stormwater and Erosion onsite .....            | 17        |
| <b>7 INFRASTRUCTURE MANAGEMENT.....</b>            | <b>18</b> |
| 7.1 Access Roads.....                              | 18        |
| 7.2 Fences, Gates, and Barricading.....            | 18        |
| 7.3 Buildings and Structures .....                 | 18        |
| <b>8 SOCIAL RESPONSIBILITY.....</b>                | <b>19</b> |
| <b>9 ENVIRONMENTAL AWARENESS AND TRAINING.....</b> | <b>20</b> |
| <b>10 HERITAGE.....</b>                            | <b>21</b> |
| <b>11 WARNING &amp; NCRS.....</b>                  | <b>21</b> |

|           |                                                        |           |
|-----------|--------------------------------------------------------|-----------|
| <b>12</b> | <b>REHABILITATION .....</b>                            | <b>22</b> |
| <b>13</b> | <b>INCIDENTS AND ACCIDENTS .....</b>                   | <b>22</b> |
| <b>14</b> | <b>MEETINGS AND OTHER CORRESPONDANCE.....</b>          | <b>22</b> |
| <b>15</b> | <b>AUDIT METHODOLOGY.....</b>                          | <b>23</b> |
| 15.1      | Audit Process.....                                     | 23        |
| 15.2      | Observation and Recommendation Determination.....      | 24        |
| 15.3      | Findings.....                                          | 24        |
| 15.4      | Audit Tables and Compliance Ratings.....               | 24        |
| <b>16</b> | <b>ASSUMPTIONS AND LIMITATIONS .....</b>               | <b>26</b> |
| <b>17</b> | <b>CONSULTATION PROCESS .....</b>                      | <b>26</b> |
| <b>18</b> | <b>FINDINGS .....</b>                                  | <b>27</b> |
| 18.1      | Minor improvements required. ....                      | 27        |
| 18.2      | Major improvements required.....                       | 27        |
| <b>19</b> | <b>AUDIT SUMMARY.....</b>                              | <b>28</b> |
| <b>20</b> | <b>RECOMMENDATIONS .....</b>                           | <b>29</b> |
| <b>21</b> | <b>CONCLUSION .....</b>                                | <b>29</b> |
|           | <b>ANNEXURE A – CONCERNS/COMPLAINTS REGISTER .....</b> | <b>31</b> |
|           | <b>ANNEXURE B - NCR REGISTER .....</b>                 | <b>31</b> |
|           | <b>ANNEXURE C - INCIDENT REGISTER.....</b>             | <b>32</b> |
|           | <b>ANNEXURE D – PHOTOGRAPHS .....</b>                  | <b>38</b> |
|           | <b>THIS PAGE WAS INTENTIONALLY LEFT BLANK .....</b>    | <b>43</b> |

## TABLE OF FIGURES

|                                                                                                                |    |
|----------------------------------------------------------------------------------------------------------------|----|
| Figure 1: Waste being sorted and packaged at waste area.....                                                   | 39 |
| Figure 2: Wetland that has been transversed by trucks . ....                                                   | 39 |
| Figure 3: Cigarettes buds on the ground.....                                                                   | 40 |
| Figure 4: Bund and roofed chemical storage area. ....                                                          | 40 |
| Figure 5: Clearance of vegetation on the sensitive must be confined to where activities are taking place. .... | 41 |
| Figure 6: Groundwater that must be pumped out before concrete is poured. ....                                  | 41 |
| Figure 7: Filled in pits where topsoil must only be spread after completion of structures .....                | 42 |

## ABBREVIATIONS

|             |                                                         |
|-------------|---------------------------------------------------------|
| <b>BAR</b>  | Basic Assessment Report                                 |
| <b>CA</b>   | Competent Authority                                     |
| <b>DEA</b>  | Department of Environmental Affairs (now DFFE)          |
| <b>DFFE</b> | Department of Forestry, Fisheries, and the Environment  |
| <b>DWS</b>  | Department of Water and Sanitation                      |
| <b>EA</b>   | Environmental Authorisation                             |
| <b>EAP</b>  | Environmental Assessment Practitioner                   |
| <b>ECO</b>  | Environmental Control Officer                           |
| <b>EIA</b>  | Environmental Impact Assessment                         |
| <b>EMPr</b> | Environmental Management Programme                      |
| <b>EO</b>   | Environmental Officer (Contractor)                      |
| <b>ER</b>   | Employer's Representative                               |
| <b>ESCO</b> | Environmental Site Compliance Officer                   |
| <b>kV</b>   | Kilovolt                                                |
| <b>MVA</b>  | Megavolt Amperes                                        |
| <b>MW</b>   | Megawatt                                                |
| <b>NCC</b>  | NCC Operations                                          |
| <b>NCR</b>  | Non-Compliance Report                                   |
| <b>NEMA</b> | National Environmental Management Act (No. 107 of 1998) |

|             |                                     |
|-------------|-------------------------------------|
| <b>NWA</b>  | National Water Act (No. 36 of 1998) |
| <b>OHPL</b> | Overhead Power Line                 |
| <b>SDC</b>  | Safe Disposal Certificate           |
| <b>SHE</b>  | Safety, Health, and Environment     |
| <b>SS</b>   | Substation                          |
| <b>TBC</b>  | To Be Confirmed                     |

# 1 INTRODUCTION

## 1.1 Background

NCC Operations (Pty) Ltd ("**NCC**") was appointed by URSA Energy (Pty) LTD ("**URSA**") to provide a suitably experienced independent Environmental Control Officer ("**ECO**") for the construction phase of Virginia Solar Park which will be connected to the Eskom Theseus Main Transmission Substation (MTS). The site is located on Farm Blomskraal 216, Ventersburg RD located within the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province. On completion the facility will consist of the Photovoltaic (PV) Power Plant with a maximum generation capacity up to 100 MW, a 132kV powerline connecting the substation to the Eskom Theseus substation which is located 16.2 km North-East of the north-western corner of project site.

The ECO has the responsibility of ensuring the mitigation/ rehabilitation measures and conditions referred to in the Environmental Authorisation ("**EA**") are implemented, as well as ensuring compliance with the requirements of the Environmental Management Programme ("**EMPr**"). This report provides an insight into the overall compliance performance and a summary of other environmental concerns and potential environmental risks through observations during site inspections.

This report is based on the following environmental conditions or requirements:

- a) Environmental Authorisations (EA)
  - 1) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
  - 2) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)
- b) Environmental Management Programmes (EMPr)
- c) Relevant environmental legislation.
- d) All other environmental permits, licenses, and authorisations.

The notification of commencement of construction was submitted to the DFFE for Virginia Solar Plant (Pty) Ltd on the 02 May 2024.

This report addresses conditions set out in the EA which states the ECO as part of their duties: *"The ECO must keep record of all activities on site, problems identified, transgressions noted, and a task schedule of tasks undertaken by the ECO."* As per the roles and responsibilities in the Virginia Solar Project ("**VSP**") EMPr, the



primary role of the ECO will be to monitor the construction activities and ensure that the mitigation measures of the EMPr and Environmental Authorisations (EA) are implemented. This report also includes an audit checklist for the VSP EA as follows:

- 1) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
- 2) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)

A summary of the various environmental requirements i.e. the audit criteria relating to the overall project is provided in **Table 1**.

**Table 1:** Summary of environmental requirements / criteria relating to the overall project.

| Components of overall project         | Environmental requirements / criteria |               |                                |          |
|---------------------------------------|---------------------------------------|---------------|--------------------------------|----------|
|                                       | DFFE EA Ref No.                       | Issue date    | Approved EMPr<br>(Compiled by) | Date     |
| Virginia Solar Park Switching Station | 14/12/16/3/3/2/2099/2                 | 20 April 2022 | AGES Limpopo (Pty) Ltd         | Jan 2022 |
| Virginia Solar Park OHPL              | 14/12/16/3/3/1/2444                   | 02 Feb 2022   | AGES Limpopo (Pty) Ltd         | Dec 2021 |

This report represents the monitoring for the Construction Phase. The responsibility of enforcement of the conditions of the EAs and EMPrs lies with the Project and Project Manager, while the Department of Forestry, Fisheries, and the Environment (“**DFFE**”) Environmental Management Inspectorate (“**EMI**”) may also enforce existing and potentially new conditions through compliance notices.

An Environmental Site Compliance Officer (“**ESCO**”) has been appointed by the holder of the EA to monitor the project compliance onsite on a full-time basis on behalf of the EA holder. The responsibilities of the ESCO includes:

- Monitoring conditions of the Basic Assessment Reports (“**BARS**”), Environmental Impact Report (**EIR**) EAs and the EMPrs.
- Ensuring compliance with all relevant environmental legislation.
- Approving method statements (reviewed by the ECO and co-approved by Site Manager).
- Remaining employed until the completion of the construction activities.
- Reporting to the Project Manager, including all findings identified onsite.

- Reporting any significant findings to the ECO.
- Preparing and submitting monthly reports to the ECO and Project Manager.
- Monitoring compliance by the Contractor.

In addition, the ESCO will:

- Undertake daily inspections of the site and surrounding areas.
- Audit compliance with the EMPr and conditions of the environmental authorisation.
- Take appropriate action if the specifications contained in the EMPr and conditions of the environmental authorisation are not followed.
- Monitor and verify that environmental impacts are kept to a minimum, as far as possible; and
- Ensure that activities onsite comply with all relevant environmental legislation.

## 1.2 Audit Scope and Purpose.

In accordance with Regulation 34 of the 2014 NEMA EIA Regulations (as amended) the holder of an environmental authorisation must, for the period during which the EA and EMPr, and where applicable the closure plan, remain valid —

- Ensure that the compliance with the conditions of the EA and the EMPr, and where applicable the closure plan, is audited; and*
- Submit an environmental audit report to the relevant competent authority.*

The purpose of this environmental audit is to verify compliance to the overarching environmental requirements specified as conditions of the EAs and EMPrs, and report on the extent to which the objectives of the EMPrs and are being achieved.

## 1.3 Monitoring Frequency and Reporting.

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 23<sup>rd</sup> of July 2025 after which this report was compiled which serves to document and audit. This report covers the monthly reporting for the month of July 2025.

## 2 AUDITOR BACKGROUND.

NCC is a multi-disciplinary environmental consulting company based in South Africa which adopts a 'values driven' approach with a common purpose to conserve and create sustainable environments that enable people, planet and business to thrive. We are a trusted partner to major engineering and construction firms, mines, parastatals, film, sports and event production companies, municipalities, provincial and national government, and conservation organisations. Drawing on our years of experience on a wide range of projects, NCC works with our clients to develop, implement, and monitor customised services that add real value.

The auditor, **Jennipher Sakaunda**, is a senior environmental manager with more than 14 years' experience currently employed with NCC. Jennipher Sakaunda has experience in several environmental fields including environmental compliance monitoring and auditing, due diligence assessment, environmental impact and risk assessment, and compilation of environmental management plans/programmes.

**Table 2:** Details of the auditor.

|                       |                                                                                                                                                                                                |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Company</b>        | NCC Operations (Pty) Ltd                                                                                                                                                                       |
| <b>Auditor</b>        | Jennipher Sakaunda                                                                                                                                                                             |
| <b>Tel</b>            | +27 21 702 2884                                                                                                                                                                                |
| <b>Mobile</b>         | +27 69 510 7630                                                                                                                                                                                |
| <b>Email</b>          | <a href="mailto:jenniphers@ncc-group.co.za">jenniphers@ncc-group.co.za</a>                                                                                                                     |
| <b>Address</b>        | 26 Bell Close, Westlake Business Park Westlake, 7945                                                                                                                                           |
| <b>Affiliation</b>    | International Association of Impact Assessment South Africa.<br>Environmental Assessment Practitioner Association of South Africa.<br>South African Council of Natural Scientific Professions. |
| <b>Qualifications</b> | BSc (honors) Environmental Management                                                                                                                                                          |
| <b>Expertise</b>      | A detailed CV can be provided on request.                                                                                                                                                      |

### 3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (July 2025) included the following:

- Excavation of monopole foundations.
- Cast blinding slab and steel fixing at the OHL.
- Filling and compaction of borrow material.
- Construction of the internal road connecting the access road to the Temporary Site Offices (TSF) and Switching Station.
- Fencing.
- Reworking of the rain damaged portions of the access road.
- Construction of the temporary stormwater berm.

#### 3.1 General Outstanding matters

Any major outstanding matters are to be recorded and summarised in the Concerns Register (**Annexure A**). The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

#### 3.2 Audits (Internal and External)

Internal audits are undertaken monthly by the Red Rocket ESCO. This ECO Audit was undertaken on the 23<sup>rd</sup> of July 2025. Audit tables/checklists are attached to this report. The ECO undertakes external monthly audits.

## 4 WASTE MANAGEMENT

The contractor must make provision for waste avoidance, minimisation, and separation of waste where possible through recycling efforts. Waste management awareness must be done on an ongoing basis and must be provided through toolbox talks and awareness posters. A waste station is under construction at V3 where waste will be temporarily stored, stored and recycled. The waste station includes a bund where waste will be stored and various compartments where waste will be sorted into. The contractor must ensure that the waste area has a roof to protect waste from weather elements. Additionally, the compartment must be on an impervious surface to prevent accidental spillages onto the soil. Recyclables are being stored until there are enough quantities to transport to Mpact for recycling.

### 4.1 Domestic/ General Waste

Approximately **290 kg** of general waste was removed from site in the month of July 2025. Waste bins are placed along the OHL line where each team will be working, at the end of the day waste is collected and placed at the laydown areas for temporary storage. Designated waste areas have been provided at the contractors' main site offices/laydown areas for purposes of temporary storage of waste prior to collection and transfer to the licensed waste facilities. Bins at the laydown area are colour coded for each waste type. The contractor has commenced with taking waste for recycling.

The service providers dispose the general waste at Matjhabeng Local Municipality waste disposal site-Licence number: B33/2/340/21/P8 16/2/7/C404/D2/Z1/P367. Proof of disposal is available on request.

### 4.2 Hazardous waste

Hazardous waste skips are available at the dedicated waste storage area at each of the sub-contractors' site offices/lay down areas. No hazardous waste was disposed of in July 2025. Hazardous waste in form of oil spillages, cement spillages and contaminated soil is kept onsite until there is enough to dispose. Although spillages have been recorded on site, they are fewer than in the previous months. To continue to reduce the number of spillages the ESCO together with the contractors Environmental Officer must re-train workers on spillages, ensure all vehicles are serviced and only road worthy are allowed onsite.

### 4.3 Wastewater

Approximately **76670,5 L** of sewerage waste was generated on site in the month of July 2025. Chemical toilets and a conservancy tank have been provided onsite. Fewer incidents spillages from the chemical toilets have been recorded this month as compared to the previous months. The contractor must ensure these chemical toilets are serviced regularly and drip trays are placed under each toilet.

The General Authorisation that was issued by DWS for the includes the use of a conservancy tank up to a capacity of 50 000l. The conservancy tank onsite has a capacity of 12 500l which is below the stipulated GA threshold. The contractor must ensure that this capacity is not exceeded.

The Appointed Service Provider removes sewage and disposes of it at Matjhabeng Local Municipality wastewater treatment facility - Licence No: 10/D4/J/G/2082. Proof of disposal is available onsite. The contractor must ensure the appointed service provider is licenced to provide sewer removal services. With the work being spread out on the lines the contractor must ensure ablutions are within walking distance within the areas where people are working.

## 5 PROTECTIVE MEASURES

### 5.1 General

Protective measures have been deployed to mitigate environmental impacts or prevent impacts from occurring which includes:

- Security guards are present on the site, with access control in place.
- Induction training is conducted for all persons working and visiting the site.
- Snake gaiters are provided.
- Spill kits are available on site.
- No-go areas are demarcated and provided with signage.
- Access cards are used to enter and exit the site.
- Rapid alcohol detecting is in place.

## 6 ENVIRONMENTAL CONSERVATION

### 6.1 Conservation of Flora and Fauna

A permit to clear the site and relocate species of concern was received from the Free state Department of Economic, Small Business Development, Tourism and Environmental Affairs. The permit with Ref No. 202306000012649 was issued on 08/06/2023 to pluck protected and unprotected flora.

Clearance of alien vegetation has is in progress, however the pace at which the contractor is removing alien vegetation is concerning especially with the onset of rains is expected in September. More resources must be allocated towards alien vegetation removal. It is important that the contractor clears all the alien vegetation as some of the alien plants will soon be dispersing seed creating a seed bank. The contractor must monitor the cleared areas to ensure alien vegetation does not re-establish. The contractor must make an effort to remove the stockpiled alien vegetation to the Matjhabeng Local Municipality for disposal

### 6.2 Water Management

Approximately **882 m<sup>3</sup>** of water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The GA allows for abstraction of 43 000m<sup>3</sup> annually, the contractor must ensure water abstraction does not exceed the licenced volumes.

### 6.3 Soil Management

Cleared topsoil has been stockpiled along the OHL line and the switching station. These must be protected from erosion and alien vegetation establishment. In some areas where the contractor has finished pouring concrete and the pits have closed .The contractor must ensure subsoil is used for infilling. Topsoil must only be spread after the structures have erected to prevent compaction. Groundwater encountered during excavation must be pumped out before concrete is poured to prevent ground water contamination.

### 6.4 Stormwater and Erosion onsite

The contractor's Stormwater Management Plan was approved, measures to manage erosion as per the approved SWMP have been implemented to prevent erosion and water ponding. More drains have been opened to prevent water ponding, and berms have been placed on the access roads to prevent them from being eroded. Measures diverted clean stormwater away from the works towards the watercourses must be implemented.

## **7 INFRASTRUCTURE MANAGEMENT**

### **7.1 Access Roads**

The project team is using existing farm roads for current construction activities until such time as the project access roads and internal roads have been constructed. The contractor has graded the access roads to address the effects water ponding and erosion. Maintenance of the access roads must be done on a regular basis.

### **7.2 Fences, Gates, and Barricading**

The site is fenced with security personnel manning the gates. Access cards are used to allow entrance to site. Barricading was observed on site, and such should continue to be maintained around all open excavations along the OHPL servitudes to prevent potential fauna (wildlife and livestock) incidents. The contractor has put temporary fences which is more secure on some of the pits where work will continue at a later stage. All excavation along the line must be barricaded and deep excavation signs and topsoil sign must be placed.

### **7.3 Buildings and Structures**

Containers have been established on site by various subcontractors that are being used as offices. Male and female ablution facilities have been provided. Chemical toilets and a conservancy tank are used to manage sewer onsite.



## 8 SOCIAL RESPONSIBILITY

Any complaints from the public are to be recorded on complaints register maintained by the Contractor whose responsibility it is to track and resolve the complaints/issues that are raised. In addition, a box for receiving internal grievances is present at the main site office facility which allows for project staff to bring to the attention of the project management team any comments and or concerns.

## 9 ENVIRONMENTAL AWARENESS AND TRAINING

The contractor has undertaken Toolbox talks for the month of July 2025 covering the following topics:

- Fuelling and Maintenance Procedure
- Fire Prevention and Control
- Handling & Storage of Hazardous Chemical Agents
- Impacts of Pollution on the Environment
- Waste Management
- Spill Prevention
- Working within the Project's footprint
- Importance of drip tray
- Preventing air pollution
- Fauna and Flora Management
- Housekeeping on Trucks
- Environment compliant refuelling on site.
- No use of Danger tape on site
- Chance find procedure
- Keep your environment Clean / housekeeping
- Report Environmental Hazards Immediately
- Pollution Prevention: Cement & Concrete
- Maintaining clean & safe toilet facilities – A shared responsibility
- Waste Disposal on site
- Incident & Accident Reporting
- Topsoil Management

## 10 HERITAGE

In the event of any unknown artefacts being uncovered during construction, the ESCO and Project Manager must be informed immediately who must then instruct work to be stopped in the immediate area and then promptly report the discovery/finding to the ECO, a heritage specialist and the relevant heritage authority to investigate and confirm if such discovery is in fact a heritage artefact of any significance. No activities impacting upon any heritage sites were reported during this reporting period.

## 11 WARNING & NCRS

No NCR reports were issued by the ECO in the month of July.

## 12 REHABILITATION

No rehabilitation works have commenced during this period, further rehabilitation is expected to occur on the project as and when other works have been completed.

## 13 INCIDENTS AND ACCIDENTS

All environmental related events, incidents and accidents are to be reported directly to the ECO and kept on a central register and included in the monthly report. No environmental incidents that are reportable under Section 30 of the NEMA occurred in July 2025. A register of environmental incidents is attached as **Annexure C**.

## 14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 23<sup>rd</sup> of July 2025 with observations documented in this report. Monthly ECO compliance reports are submitted to the Department (DFFE) by the ECO.

## 15 AUDIT METHODOLOGY

This section provides an overview of the methods employed in making observations and providing recommendations and conclusions derived from the audit procedures undertaken.

### 15.1 Audit Process

The site visit, data reviews and report drafting were undertaken by the ECO/auditor. The audit included the following procedures:

- **Site Inspections.** The areas and aspects covered during the inspections with concurrent discussions with the ESCO and site-based representatives of the EA holder included *inter alia*:
  - i. Access control to the sites.
  - ii. Ecologically sensitive areas, where applicable.
  - iii. Waste management.
  - iv. Incident and complaints management.
  - v. Landowner relations.
  - vi. Infrastructure management.
  - vii. Environmental Awareness.
  - viii. Record-keeping and document control.
  - ix. Stormwater and Erosion management
- **Documentation review.** This included:
  - i. A review of the EAs, EMPs and where applicable, method statements.
  - ii. A review of previous audit reports, records, observations, and findings.
  - iii. A review of any remedial and/or protective measures implemented.
  - iv. Identification, if applicable, any gaps requiring action and/or rectification.
- **Audit Report compilation.** This included:
  - i. Recording any observations and findings identified during the audit.
  - ii. Providing recommendations relating to improvement or non-compliance, if and where applicable.

## 15.2 Observation and Recommendation Determination

Observations and subsequent recommendations were based on and are limited to the following:

- i. Available documentation and records viewed or received prior, subsequent, or during the site visit.
- ii. Observations made during the period that the ECO/auditor was on site; and
- iii. Information received from both direct and cross-referenced discussions with permanent site-based staff.

## 15.3 Findings

Any key findings highlighted in this report will indicate areas and/or aspects that require improvement or rectification. The purpose of summarising the findings is to allow the EA holder to identify common management challenges that effect the level of compliance to the conditions of the EAs and EMPrs.

Where findings and recommendations pertaining are deemed significant through compliance status or performance, they are documented as specific issues in the report. All site-specific observations are recorded in the corresponding audit checklist tables.

## 15.4 Audit Tables and Compliance Ratings

The audit table captures observations and recommendations made in relation to the conditions stipulated in the EAs and EMPrs. It provides the reader with more detailed information in terms of what the stipulated requirements are in relation to the organisation's assessed current compliance status, according to the observations recorded by the auditor.

Ratings are calculated based on a scoring system whereby each auditable condition is provided with a score as highlighted in **Table 4** below.

**Table 4:** Compliance rating and scoring.

| Status                              | Compliance Rating |         | Description                                                                                                                                                                                |
|-------------------------------------|-------------------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | Abbreviation      | Scoring |                                                                                                                                                                                            |
| <i>Compliant</i>                    | C                 | 2       | <i>No improvements required</i>                                                                                                                                                            |
| <i>Partially Compliant</i>          | PC                | 1       | <i>Minor improvements required</i>                                                                                                                                                         |
| <i>Non-Compliant</i>                | NC                | 0       | <i>Major improvements required</i>                                                                                                                                                         |
| <i>Work in Progress</i>             | WiP               | -       | <i>Environmental management measures are underway but not yet fully implemented or verified, requiring further monitoring and assessment.</i>                                              |
| <i>Not Applicable / Not Audited</i> | NA                | -       | <i>No improvements required and / or the condition is either not, not yet or no longer relevant at the time of the audit</i>                                                               |
| <i>Informative</i>                  | info              | -       | <i>These relate to informative elements that provide either useful information or are descriptive in the explanation and understanding of statements or concepts in the audit criteria</i> |

Each condition has been ascribed a colour-coded status indicator of Compliant (green), Partially Compliant (orange), major-compliant (red), Not Auditable/Audited (grey), Work in Progress (light red) and Informative (blank/white) to assist the reader in determining aspects that require attention to improve on compliance achieved, if and where applicable. No compliance scoring is attributed any of the audit criteria information pertaining to the following three audit status symbols, namely 'NA', 'WiP', and 'info' as they were either not auditable and/or were not applicable/relevant at the time the audit was undertaken. In other words, they are excluded from the overall compliance rating calculations.

An overall compliance rating is calculated as a percentage to provide the reader with an overview of compliance to the relevant audit criteria however each condition should be considered on its own merits as the ratings do not necessarily portray the severity or impact of the reported finding relating to a condition.

## 16 ASSUMPTIONS AND LIMITATIONS

The ECO compliance audit and associated report are based upon the assumptions that:

- i. Documentation provided to the ECO/auditor is factual and true.
- ii. The audit is based purely on the conditions as stipulated in the EAs and EMPs.
- iii. The construction phase is currently underway and operational phase activities are not applicable.
- iv. Documentation / reports were randomly sampled / reviewed in order to accommodate time constraints.
- v. Where visual observations were not possible either due to physical access constraints or safety constraints, the ECO/auditor used other means to determine compliance, either through requesting written evidence provided by contractors / service providers who service the site or via interviews with technical site-based staff.

## 17 CONSULTATION PROCESS

The approach of consultation followed during the environmental audit was based on written (email) and telephonic correspondence between the ECO/auditor and the Environmental Site Compliance Officer which also includes consultation and communication with the EA holder and competent authority in terms of report submission.



## 18 FINDINGS

Findings are listed in the attached checklists, and it should be noted that findings should be considered individually in the context of the full audit and each condition and associated rating.

The following findings were noted onsite:

- Clearance of alien vegetation ongoing on the stockpiles.
- Groundwater has been encountered during monopole excavations.
- Waste recycling has commenced onsite.
- Some excavated pits had no deep excavation and topsoil signages.
- No barricading has been put for the no-go areas on the wetland at tower 13.
- Contractor's trucks are driving on the wetland at tower 13.
- Cigarette buds were found on the ground.
- The concrete slab at V3 waste area is in use without the bunding.

Based on the outcomes of the audit it was established that the objectives of the EAs and EMPs were achieved in terms of:

- i. *Sufficiently providing for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis.*
- ii. *Ensuring compliance with the provisions of environmental authorisation and EMP.*

### 18.1 Minor improvements required.

- Ensuring smoking is done at designated areas.
- The slab at the waste area must be bunded.

### 18.2 Major improvements required.

- Clearance of alien vegetation must be done on all affected areas.
- A barricading net must be placed to demarcate the no-go areas at the wetland area.
- All excavations must be fitted with deep excavation and topsoil signs.

## 19 AUDIT SUMMARY

In terms of the findings and results of the **July 2025** ECO audit, the project achieved an overall **99%** compliance rating with the conditions of the EAs and EMPs.

**Table 5: Compliance Scoring**

| No.                                       | Audit criteria                                                                                             | Compliant (C) | Partially Compliant (PC) | Major-non-Compliant (NC) | Work in Progress | Normative (info) | Not Applicable / Not Audited (NA) | Percentage Score      |
|-------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------|--------------------------|--------------------------|------------------|------------------|-----------------------------------|-----------------------|
| 1                                         | Environmental Authorisation for Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)                | 24            | 0                        | 0                        | 1                | 18               | 3                                 | 100%                  |
| 2                                         | Environmental Authorisation for Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2) | 26            | 0                        | 0                        | 1                | 19               | 3                                 | 100%                  |
| 3                                         | EMPr Virginia Solar Park OHPL (DFFE REF NO: 14/12/16/3/3/1/2444)                                           | 215           | 7                        | 0                        | 0                | 49               | 57                                | 98%                   |
| 4                                         | EMPr Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2)                            | 176           | 3                        | 1                        | 0                | 21               | 27                                | 99%                   |
| Overall total no. conditions              |                                                                                                            | 441           | 10                       | 0                        | 2                | 107              | 90                                |                       |
| Audited conditions                        |                                                                                                            | 882           | 10                       | 0                        | 0                | -                | -                                 | (Potential max score) |
| Overall Compliance Rating Calculation (%) |                                                                                                            | 99%           |                          |                          |                  |                  |                                   |                       |

## 20 RECOMMENDATIONS

**Based on the findings identified the following is recommended:**

- Barricade net the no-go areas at the wetland at tower number 13 must be erected.
- Should it be necessary only one track must be allowed to transverse the wetland and be rehabilitated after works have been completed.
- Alien vegetation clearance must continue onsite, and the contractor must monitor the cleared areas to prevent reestablishment of alien vegetation.
- All excavation must be fitted with signs.
- All trenches must be barricaded at the end of each working day.
- When groundwater is encountered it must be pumped out before concrete is poured.
- Clearance of vegetation must be confined to where development is occurring.

## 21 CONCLUSION

The contractor must ensure that systems and resources to monitor and manage environmental risks and impacts adequately are in place. Resources and personnel to train employees on the contents of the EMPs must be made to ensure that the project runs effectively and efficiently with minimal impact to the biophysical and socio-economic environment.

In general, the EMPs are effective in their current format in terms of content and relevance and there are no major shortcomings. The EMP's sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with this project.

**PREPARED BY:**

A handwritten signature in black ink, appearing to read 'Sakaunda'.

**Sakaunda Jennipher**

Environmental Control Officer

NCC Operations (Pty) Ltd

**M** ·069 510 7630

**E** · [jenniphers@ncc-group.co.za](mailto:jenniphers@ncc-group.co.za)

**REVIEWED BY:**

A handwritten signature in black ink, appearing to read 'Nick Gates'.

**Nick Gates**

Senior Environmental Consultant

NCC Operations (Pty) Ltd

**M** ·073 1998 431

**E** ·[nickg@ncc-group.co.za](mailto:nickg@ncc-group.co.za)

## ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

### Open Concerns/Complaint

| No | Observation date | Concern/Complaint | Suggested Due Date <sup>1</sup> | Proposed Corrective Action | Status | Closure status |
|----|------------------|-------------------|---------------------------------|----------------------------|--------|----------------|
|    |                  |                   |                                 |                            |        |                |

*\*The concerns register is updated once the ECO is present on site.*

### Closed Concerns

| No | Observation date | Concern/Complaint | Due Date suggested by ECO | Corrective Action Taken | Outcome | Closure status |
|----|------------------|-------------------|---------------------------|-------------------------|---------|----------------|
|    |                  |                   |                           |                         |         |                |
|    |                  |                   |                           |                         |         |                |

## ANNEXURE B - NCR REGISTER

| Ref No. | Originator | Dated Issued | Description | Proposed Corrective Action | Closure Status | Closure Date | Further Action Required |
|---------|------------|--------------|-------------|----------------------------|----------------|--------------|-------------------------|
|         |            |              |             |                            |                |              |                         |

## ANNEXURE C - INCIDENT REGISTER

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                       | Volume                                             | Remedial Action                                              |                                                                             |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|--------------------------------------------------------------|-----------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                                                 |                                                    | Immediate<br>Corrective<br>Actions                           | Preventative<br>measures                                                    |
| 20/03/2025 | Waste water                                                                                     | Soil pollution                                                                               | On 20, 2025, at approximately 8:28, the conservative tank being used to collect wastewater from conservancy tank had overfilled, and a Spillage had occurred spillage of approximately 8-10 litres of wastewater mixed with the cleaning material. the toilet supplier attended to the spill immediate & initiated spill Clean-up. Contaminated soil was taken to the hazardous waste skip.   | 10 l<br>(below<br>Section<br>30<br>threshol<br>d ) | Clean- up must be done as soon as the spills are identified. | The conservancy tank must be emptied more frequently to reduce overfilling. |
| 19/03/2025 | Waste water                                                                                     | Soil pollution                                                                               | Approximately 12 litres of wastewater mixed with the cleaning chemicals where toilets are located. The toilet had been leaking since the previous day and wastewater was contained in a drip tray. The toilet supplier was notified, and he came to service<br><br>The toilets; however, during servicing; the drip tray spilled over causing the spillage of the wastewater onto the ground. | 12l<br>(below<br>Section<br>30<br>threshol<br>d )  | Clean- up must be done as soon as the spills are identified. | Leaking toilets must not be allowed onsite.                                 |

| Date       | Type                                                                                           | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                    | Volume                                             | Remedial Action                                             |                                                                                 |
|------------|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|-------------------------------------------------------------|---------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna &Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                              |                                                    | Immediate<br>Corrective<br>Actions                          | Preventative<br>measures                                                        |
| 08/03/2025 | Diesel spillage                                                                                | Soil pollution                                                                               | On 08 March 2025 at 05:30, security supervisor discovered a diesel leakage during the morning patrol. The spillage occurred due to the diesel injectors that were loose one of them was not properly fitted and diesel pressure removed them while the bakkie was in motion.               | 20l<br>(below<br>Section<br>30<br>threshold )      | Clean- up must be done as soon as the spills are identified | Vehicles must be maintained regular . only road worthy vehicles must be onsite. |
| 07/03/2025 | Water and antifreeze                                                                           | Soil pollution                                                                               | The Driver parked the minibus on site, shortly a leak observed containing a mixture of water and antifreeze, while also exhibiting signs of overheating.                                                                                                                                   | -                                                  | Clean- up must be done as soon as the spills are identified | Vehicles must be maintained regular. only road worthy vehicles must be onsite.  |
| 06/05/2025 | Water mixed with antifreeze spillage                                                           | Soil pollution                                                                               | On 6 May 2025 at 14:00, the TLB Operator was busy moving spoil material near the access road to the allocated spoil Stockpile area, when the TLB, radiator fan belt snapped & the container that stores water & antifreeze busted. Approximately 5 Liters of water with antifreeze spilled | 5 litres<br>(below<br>Section<br>30<br>threshold ) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.                   |
| 08/05/2025 | Toilet Cleaner mixed with water spillage                                                       | Soil pollution                                                                               | A chemical toilet in PV3 at the laydown area at around 3:53 pm, 08 May 2025 was reported to be leaking, when the toilet was assessed, it was identified that there was a broken pipe that leaked the chemical water. An                                                                    | 6 litres<br>(below<br>Section<br>30<br>threshold ) | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent.          |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                    | Volume                                            | Remedial Action                                             |                                                                        |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                              |                                                   | Immediate<br>Corrective<br>Actions                          | Preventative<br>measures                                               |
|            |                                                                                                 |                                                                                              | immediate action was taken to clean up the spillage. The contaminated soil was collected into the bags and taken to site waste management area.                                                                                                                                                            |                                                   |                                                             |                                                                        |
| 12/05/2025 | Diesel spillage                                                                                 | Soil pollution                                                                               | On 12-05-2025 at 06:40, the ambulance was on the way to the access control point along the main access road, when it had a sudden breakdown and diesel was spilled along the access road, leaving a trail of diesel spill for approximately + -400 Metres. Approximately + -2 Litres of diesel was spilled | 2 litres<br>(below<br>Section<br>30<br>threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.          |
| 15/05/2025 | Hydraulic oil spillage                                                                          | Soil pollution                                                                               | On the 15/05/2025, a side tipper truck was transporting spoil material when the cylinder failed and spilled ~7 litres of hydraulic oil, about 455m from the nearest watercourse. The contaminated soil was promptly cleaned up.                                                                            | 7 litres<br>(below<br>Section<br>30<br>threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.          |
| 20/05/2025 | Toilet Cleaner mixed with water spillage                                                        | soil pollution                                                                               | It was around 11:30 am when it was reported that there was a spillage, that when the Fidamo team was about to clean the toilets at Pv1 Laydown area, a pipe from the generator busted and the water leaked from the broken pipe. The water that spilled was approximately 3-4 Liters                       | 4 litres<br>(below<br>Section<br>30<br>threshold) | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent. |



| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                 | Volume                                    | Remedial Action                                                                 |                                                                                      |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|---------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                              |                                           | Immediate Corrective Actions                                                    | Preventative measures                                                                |
|            |                                                                                  |                                                                            | and the pipe was immediately stopped. The chemical that was in the water is blue splash Toilet chemical. An immediate action was taken to clean up the spillage. The contaminated soil was collected into the bags and taken to site waste management area.                                                                                                                                                             |                                           |                                                                                 |                                                                                      |
| 21/05/2025 | Fauna                                                                            | Loss of biodiversity                                                       | On the 21/05/2025 a snake was fatally wounded during the internal road construction works.                                                                                                                                                                                                                                                                                                                              | N/A                                       | The dead animal was buried.                                                     | N/A                                                                                  |
| 26/05/2025 | Hydraulic oil spillage                                                           | Soil pollution                                                             | On 26/05/2025, at around 16:50 a drill rig operator noticed a leak from the machine, he immediately reported the leak to the supervisor. The supervisor called the mechanic but did not report the spillage. The oil further spilled to the soil during the repair attempts which were done under poor lighting. The spillage was left overnight and was only reported to the EO the next morning when the shift began. | 25 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified.                    | The ESCO issued NCR to the subcontractor for failing to report spillage immediately. |
| 11/06/2025 | Concrete and oil Spillage                                                        | Soil pollution                                                             | On the 11 <sup>th</sup> of June 2025 the concrete mixer truck overturned resulting in the spillage of an estimated 3m3 (3 cubic meters) of concrete                                                                                                                                                                                                                                                                     | 8 litres of diesel and 3m3 of concrete    | Clean- up must be done as soon as possible and an investigation must be done on | The ESCO issued an NCR to the subcontractor for failing to report                    |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                             | Volume                                             | Remedial Action                                                                                     |                                                                                                  |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|-----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                       |                                                    | Immediate<br>Corrective<br>Actions                                                                  | Preventative<br>measures                                                                         |
|            |                                                                                                 |                                                                                              | and approximately 8 litres of diesel. The contractor removed the spilled concrete and dumped it on the natural area adjacent to the road                                                                                                                                                                                                                                                                                                            | (below<br>Section<br>30<br>threshold)              | the cause of the accident.                                                                          | dumping concrete on the natural vegetation.                                                      |
| 16/06/2025 | Toilet Cleaner mixed with water spillage                                                        | Soil pollution                                                                               | At 08:32am, on the 16th of June 2025, The Client (Robin) reported that ABLON's Ablution facilities were leaking which resulted to soil contamination, we immediately stopped everyone from using the Toilet and reported the issue to our service provider. A drip tray was placed immediately underneath the toilet. The event occurred at the OHL Site Camp and the name of the chemical that spilled on the ground is Portabloo Toilet Chemical. | 30 litres<br>(below<br>Section<br>30<br>threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 24/06/2025 | Toilet Cleaner mixed with water spillage                                                        | Soil pollution                                                                               | At around 8 am on the 24/06/2025 a spillage was reported by the contractor. Approximately 30 litres of Toilet Blue was spilled at the Virginia 1 laydown area. The spillage was cleaned up and the contaminated soil removed for disposal.                                                                                                                                                                                                          | 30 litres<br>(below<br>Section<br>30<br>threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 08/07/2025 | Hydraulic Oil Spillage                                                                          | Soil pollution                                                                               | A tipper truck spilled some hydraulic oil when the driver was offloading some excavated material at PV2 I8 road on the 08h of July 2025. The driver lifted the truck to                                                                                                                                                                                                                                                                             | 30 litres<br>(below<br>Section<br>30<br>threshold) | The contaminated soil was removed using shovel and the soil was contained in a                      | Vehicles that are constantly breaking down must be moved off site.                               |

| Date | Type<br>Chemical Spill/<br>Sewage/ Waste/<br>Fauna &Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Impact<br>Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | Description of Incident<br>What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                                                                        | Volume | Remedial Action                    |                          |
|------|--------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|------------------------------------|--------------------------|
|      |                                                                                                        |                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                 |        | Immediate<br>Corrective<br>Actions | Preventative<br>measures |
|      |                                                                                                        |                                                                                                        | off load the material when it was halve way up, he discovered that the body of the truck was swinging to the sides and he tried to stop, and discovered some oil leaks from the hydraulic cylinder, about +-9 litres of oil spilled to the ground and it was reported to the EO, immediately the supervisor and the driver cleaned the spillage and the contaminated soil was collected into bags and taken to ABC Solar Waste management area. |        | hazardous waste bin.               |                          |

## **ANNEXURE D – PHOTOGRAPHS**



**Figure 1:** Waste being sorted and packaged at waste area.



**Figure 2:** Wetland that has been transversed by trucks .





**Figure 3:** Cigarettes buds on the ground.



**Figure 4:** Bund and roofed chemical storage area.



**Figure 5:** Clearance of vegetation on the sensitive must be confined to where activities are taking place.



**Figure 6:** Groundwater that must be pumped out before concrete is poured.





**Figure 7:** Filled in pits where topsoil must only be spread after completion of structures



**THIS PAGE WAS INTENTIONALLY LEFT BLANK**



---

# ECO MONTHLY ENVIRONMENTAL MONITORING REPORT

Virginia Photo Voltaic (PV) Solar Facility 1, 2 and 3,  
Matjhabeng, Lejweleputswa District Municipality within  
the jurisdiction of the Free State Province.

---

**PREPARED FOR:**

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

Department of Forestry, Fisheries, and the Environment: Compliance Monitoring

**DATED:**

July 2025

**PREPARED BY:**

NCC Operations

**T** • 021 702 2884

**E** • [info@ncc-group.co.za](mailto:info@ncc-group.co.za)

## DECLARATION OF INDEPENDENCE

I, Jennipher Sakaunda, as duly authorised representative of NCC Operations (Pty) Ltd ("**NCC**"), hereby confirm my independence (as well as that of NCC) as an auditor and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which URSA Energy (Pty) Ltd has appointed NCC as Environmental Control Officer ("**ECO**"), other than fair remuneration for work performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'J Sakaunda', is positioned below the 'Signed:' text.

**Jennipher Sakaunda**

05 August 2025

Environmental Control Officer

NCC Operations (Pty) Ltd

## **LIABILITY DISCLAIMER AND CONFIDENTIALITY CLAUSE**

All inspections conducted, as well as reports and recommendations provided by NCC are purely advisory. They are primarily intended for the purpose of assisting clients in loss control, risk management as well as health, safety, and environmental procedures.

Observations and recommendations are the result of practices and conditions observed, and information made available to us in various forms at the time of our visit. They do not purport to refer to or guarantee compliance with local or government regulations which may be applicable to such practices and conditions. This report should not be considered a definitive listing of all existing risks nor an absolute solution to all indicated risks, or hazards present from time to time in the Client Organisation. The report should always be considered in its entirety; individual sentences, paragraphs or sections of the report should not be used in isolation.

This report should not be reproduced except in its entirety, including this liability disclaimer or contents reproduced or disclosed to any third party without the prior written approval of NCC.

NCC assumes no responsibility for any losses incurred as a result of the implementation, management, and operation of recommended health, safety and environmental systems, processes and procedures.

## DOCUMENT CONTROL

|                     |                                             |
|---------------------|---------------------------------------------|
| <b>REPORT TITLE</b> | Monthly ECO Environmental Monitoring Report |
| <b>PROJECT</b>      | Virginia Solar PV 1, 2, 3                   |
| <b>LOCATION</b>     | Free State Province                         |
| <b>EA HOLDER</b>    | URSA Energy (Pty) Ltd                       |
| <b>ECO</b>          | NCC Operations (Pty) Ltd                    |
| <b>REVISION</b>     | 00                                          |
| <b>DATE</b>         | 04/08/2025                                  |

| Revision | Date       | Description                  |
|----------|------------|------------------------------|
| Rev 00   | 05/08/2025 | First Draft - Internal       |
| Rev 01   | TBC        | Final - Authority submission |

## REPORT DISTRIBUTION LIST

| Name                   | Organisation                      | Issued     | Format     |
|------------------------|-----------------------------------|------------|------------|
| Janine Brasington      | Red Rocket South Africa (Pty) Ltd | 05/08/2025 | Electronic |
| Serina Pillay          | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Maggie Logan           | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Director of Compliance | DFFE                              | TBC        | Electronic |

## TABLE OF CONTENTS

|                                                    |           |
|----------------------------------------------------|-----------|
| <b>TABLE OF FIGURES .....</b>                      | <b>7</b>  |
| <b>ABBREVIATIONS .....</b>                         | <b>8</b>  |
| <b>1 INTRODUCTION .....</b>                        | <b>10</b> |
| 1.1 Background.....                                | 10        |
| 1.2 Audit Scope and Purpose.....                   | 12        |
| 1.3 Monitoring Frequency and Reporting.....        | 12        |
| <b>2 AUDITOR BACKGROUND. ....</b>                  | <b>13</b> |
| <b>3 GENERAL (NOTABLE EVENTS) .....</b>            | <b>14</b> |
| 3.1 General Outstanding matters.....               | 14        |
| 3.2 Audits (Internal and External).....            | 14        |
| <b>4 WASTE MANAGEMENT.....</b>                     | <b>15</b> |
| 4.1 Domestic/ General Waste.....                   | 15        |
| 4.2 Hazardous waste.....                           | 15        |
| 4.3 Wastewater .....                               | 16        |
| <b>5 PROTECTIVE MEASURES .....</b>                 | <b>16</b> |
| 5.1 General .....                                  | 16        |
| <b>6 ENVIRONMENTAL CONSERVATION.....</b>           | <b>17</b> |
| 6.1 Conservation of Flora and Fauna.....           | 17        |
| 6.2 Water Management.....                          | 17        |
| 6.3 Soil Management .....                          | 17        |
| 6.4 Stormwater and Erosion onsite .....            | 18        |
| <b>7 INFRASTRUCTURE MANAGEMENT.....</b>            | <b>19</b> |
| 7.1 Access Roads.....                              | 19        |
| 7.2 Fences, Gates, and Barricading .....           | 19        |
| 7.3 Buildings and Structures .....                 | 19        |
| <b>8 SOCIAL RESPONSIBILITY.....</b>                | <b>19</b> |
| <b>9 ENVIRONMENTAL AWARENESS AND TRAINING.....</b> | <b>20</b> |
| <b>10 HERITAGE.....</b>                            | <b>20</b> |
| <b>11 WARNING &amp; NCRS.....</b>                  | <b>21</b> |

|           |                                                        |           |
|-----------|--------------------------------------------------------|-----------|
| <b>12</b> | <b>REHABILITATION .....</b>                            | <b>21</b> |
| <b>13</b> | <b>INCIDENTS AND ACCIDENTS .....</b>                   | <b>21</b> |
| <b>14</b> | <b>MEETINGS AND OTHER CORRESPONDANCE.....</b>          | <b>21</b> |
| <b>15</b> | <b>AUDIT METHODOLOGY.....</b>                          | <b>22</b> |
| 15.1      | Audit Process.....                                     | 22        |
| 15.2      | Observation and Recommendation Determination.....      | 23        |
| 15.3      | Findings.....                                          | 23        |
| 15.4      | Audit Tables and Compliance Ratings .....              | 23        |
| <b>16</b> | <b>ASSUMPTIONS AND LIMITATIONS .....</b>               | <b>25</b> |
| <b>17</b> | <b>CONSULTATION PROCESS.....</b>                       | <b>25</b> |
| <b>18</b> | <b>FINDINGS .....</b>                                  | <b>26</b> |
| 18.1      | Minor improvements required. ....                      | 26        |
| 18.2      | Major improvements required.....                       | 26        |
| <b>19</b> | <b>AUDIT SUMMARY.....</b>                              | <b>27</b> |
| <b>20</b> | <b>RECOMMENDATIONS .....</b>                           | <b>28</b> |
| <b>21</b> | <b>CONCLUSION.....</b>                                 | <b>28</b> |
|           | <b>ANNEXURE A – CONCERNS/COMPLAINTS REGISTER .....</b> | <b>30</b> |
|           | <b>ANNEXURE B - NCR REGISTER .....</b>                 | <b>30</b> |
|           | <b>ANNEXURE C - INCIDENT REGISTER.....</b>             | <b>31</b> |
|           | <b>ANNEXURE D – PHOTOGRAPHS .....</b>                  | <b>37</b> |

## TABLE OF FIGURES

|                                                                                       |    |
|---------------------------------------------------------------------------------------|----|
| Figure 1: Oil spillages.....                                                          | 38 |
| Figure 2: Nuisance due to water spillage.....                                         | 38 |
| Figure 3: Concrete that must be removed from the construction area for disposal. .... | 39 |
| Figure 4: Cigarette buds found on the ground.....                                     | 39 |
| Figure 5: Barricaded heritage area .....                                              | 40 |
| Figure 6: Alien vegetation.....                                                       | 40 |
| Figure 7: Truck driving over topsoil stockpile. ....                                  | 41 |
| Figure 8: Trucks with no drip Trays .....                                             | 41 |
| Figure 9: On going Clearance of Alien Vegetation.....                                 | 42 |



## ABBREVIATIONS

|             |                                                         |
|-------------|---------------------------------------------------------|
| <b>BAR</b>  | Basic Assessment Report                                 |
| <b>CA</b>   | Competent Authority                                     |
| <b>DEA</b>  | Department of Environmental Affairs (now DFFE)          |
| <b>DFFE</b> | Department of Forestry, Fisheries, and the Environment  |
| <b>DWS</b>  | Department of Water and Sanitation                      |
| <b>EA</b>   | Environmental Authorisation                             |
| <b>EAP</b>  | Environmental Assessment Practitioner                   |
| <b>ECO</b>  | Environmental Control Officer                           |
| <b>EIA</b>  | Environmental Impact Assessment                         |
| <b>EMPr</b> | Environmental Management Programme                      |
| <b>EO</b>   | Environmental Officer (Contractor)                      |
| <b>ER</b>   | Employer's Representative                               |
| <b>ESCO</b> | Environmental Site Compliance Officer                   |
| <b>kV</b>   | Kilovolt                                                |
| <b>MVA</b>  | Megavolt Amperes                                        |
| <b>MW</b>   | Megawatt                                                |
| <b>NCC</b>  | NCC Operations                                          |
| <b>NCR</b>  | Non-Compliance Report                                   |
| <b>NEMA</b> | National Environmental Management Act (No. 107 of 1998) |
| <b>NWA</b>  | National Water Act (No. 36 of 1998)                     |

|             |                                 |
|-------------|---------------------------------|
| <b>OHPL</b> | Overhead Power Line             |
| <b>SDC</b>  | Safe Disposal Certificate       |
| <b>SHE</b>  | Safety, Health, and Environment |
| <b>SS</b>   | Substation                      |
| <b>TBC</b>  | To Be Confirmed                 |

# 1 INTRODUCTION

## 1.1 Background

NCC Operations (Pty) Ltd ("**NCC**") was appointed by URSA Energy (Pty) LTD ("**URSA**") to provide a suitably experienced independent Environmental Control Officer ("**ECO**") for the construction phase of Virginia Solar Park which will be connected to the Eskom Theseus Main Transmission Substation (MTS). The site is located on Farm Blomskraal 216, Ventersburg RD located within the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province. On completion the facility will consist of the Photovoltaic (PV) Power Plant with a maximum generation capacity up to 100 MW, a 132kV powerline connecting the substation to the Eskom Theseus substation which is located 16.2 km North-East of the north-western corner of project site.

The ECO has the responsibility of ensuring the mitigation/ rehabilitation measures and conditions referred to in the Environmental Authorisation ("**EA**") are implemented, as well as ensuring compliance with the requirements of the Environmental Management Programme ("**EMPr**"). This report provides an insight into the overall compliance performance and a summary of other environmental concerns and potential environmental risks through observations during site inspections.

This report is based on the following environmental conditions or requirements:

- a) Environmental Authorisations (EA)
  - 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
  - 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
  - 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)
- b) Environmental Management Programmes (EMPr)
- c) Relevant environmental legislation.
- d) All other environmental permits, licenses, and authorisations.

The notification of commencement of construction was submitted to the DFFE for Virginia Solar Plant (Pty) Ltd on the 02 May 2024.

This report addresses conditions set out in the EA which states the ECO as part of their duties: "*The ECO must keep record of all activities on site, problems identified, transgressions noted, and a task schedule of tasks undertaken by the ECO.*" As per the roles and responsibilities in the Virginia Solar Project ("**VSP**") EMPr, the primary role of the ECO will be to monitor the construction activities and ensure that the mitigation measures

of the EMPr and Environmental Authorisations (EA) are implemented. This report also includes an audit checklist for the VSP EA as follows:

- 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
- 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
- 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)

A summary of the various environmental requirements i.e. the audit criteria relating to the overall project is provided in **Table 1**.

**Table 1:** Summary of environmental requirements / criteria relating to the overall project.

| Components of overall project | Environmental requirements / criteria |               |                                |          |
|-------------------------------|---------------------------------------|---------------|--------------------------------|----------|
|                               | DFFE EA Ref No.                       | Issue date    | Approved EMPr<br>(Compiled by) | Date     |
| Virginia 1 Solar Park         | 14/12/16/3/3/2/2099/1                 | 20 April 2022 | AGES Limpopo (Pty) Ltd         | Jan 2022 |
| Virginia 2 Solar Park         | 14/12/16/3/3/2/2100                   | 20 May 2022   | AGES Limpopo (Pty) Ltd         | Jan 2022 |
| Virginia 3 Solar Park         | 14/12/16/3/3/2/2101                   | 20 April 2022 | AGES Limpopo (Pty) Ltd         | Feb 2022 |

This report represents the monitoring for the Construction Phase. The responsibility of enforcement of the conditions of the EAs and EMPrs lies with the Project and Project Manager, while the Department of Forestry, Fisheries, and the Environment (“**DFFE**”) Environmental Management Inspectorate (“**EMI**”) may also enforce existing and potentially new conditions through compliance notices.

An Environmental Site Compliance Officer (“**ESCO**”) has been appointed by the holder of the EA to monitor the project compliance onsite on a full-time basis on behalf of the EA holder. The responsibilities of the ESCO includes:

- Monitoring conditions of the Basic Assessment Reports (“**BARs**”), Environmental Impact Report (**EIR**) EAs and the EMPrs.
- Ensuring compliance with all relevant environmental legislation.
- Approving method statements (reviewed by the ECO and co-approved by Site Manager).
- Remaining employed until the completion of the construction activities.
- Reporting to the Project Manager, including all findings identified onsite.

- Reporting any significant findings to the ECO.
- Preparing and submitting monthly reports to the ECO and Project Manager.
- Monitoring compliance by the Contractor.

In addition, the ESCO will:

- Undertake daily inspections of the site and surrounding areas.
- Audit compliance with the EMPr and conditions of the environmental authorisation.
- Take appropriate action if the specifications contained in the EMPr and conditions of the environmental authorisation are not followed.
- Monitor and verify that environmental impacts are kept to a minimum, as far as possible; and
- Ensure that activities onsite comply with all relevant environmental legislation.

## **1.2 Audit Scope and Purpose.**

In accordance with Regulation 34 of the 2014 NEMA EIA Regulations (as amended) the holder of an environmental authorisation must, for the period during which the EA and EMPr, and where applicable the closure plan, remain valid —

- a) Ensure that the compliance with the conditions of the EA and the EMPr, and where applicable the closure plan, is audited; and*
- b) Submit an environmental audit report to the relevant competent authority.*

The purpose of this environmental audit is to verify compliance to the overarching environmental requirements specified as conditions of the EAs and EMPrs, and report on the extent to which the objectives of the EMPrs and are being achieved.

## **1.3 Monitoring Frequency and Reporting.**

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 23<sup>rd</sup> of July 2025 after which this report was compiled which serves to document and audit. This report covers the monthly reporting for the month of July 2025.

## 2 AUDITOR BACKGROUND.

NCC is a multi-disciplinary environmental consulting company based in South Africa which adopts a 'values driven' approach with a common purpose to conserve and create sustainable environments that enable people, planet and business to thrive. We are a trusted partner to major engineering and construction firms, mines, parastatals, film, sports and event production companies, municipalities, provincial and national government, and conservation organisations. Drawing on our years of experience on a wide range of projects, NCC works with our clients to develop, implement, and monitor customised services that add real value.

The auditor, **Jennipher Sakaunda**, is a senior environmental manager with more than 14 years' experience currently employed with NCC. Jennipher Sakaunda has experience in several environmental fields including environmental compliance monitoring and auditing, due diligence assessment, environmental impact and risk assessment, and compilation of environmental management plans/programmes.

**Table 2:** Details of the auditor.

|                       |                                                                                                                                                                                                |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Company</b>        | NCC Operations (Pty) Ltd                                                                                                                                                                       |
| <b>Auditor</b>        | Jennipher Sakaunda                                                                                                                                                                             |
| <b>Tel</b>            | +27 21 702 2884                                                                                                                                                                                |
| <b>Mobile</b>         | +27 69 510 7630                                                                                                                                                                                |
| <b>Email</b>          | <a href="mailto:jenniphers@ncc-group.co.za">jenniphers@ncc-group.co.za</a>                                                                                                                     |
| <b>Address</b>        | 26 Bell Close, Westlake Business Park Westlake, 7945                                                                                                                                           |
| <b>Affiliation</b>    | International Association of Impact Assessment South Africa.<br>Environmental Assessment Practitioner Association of South Africa.<br>South African Council of Natural Scientific Professions. |
| <b>Qualifications</b> | BSc (honors) Environmental Management                                                                                                                                                          |
| <b>Expertise</b>      | A detailed CV can be provided on request.                                                                                                                                                      |

### 3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (July 2025) included the following:

- Construction of the internal road connecting the access road to the Temporary Site Offices (TSF) and Switching Station.
- Demobilisation of site offices and laydown area.
- Fencing.
- Clearing and grubbing of PV area and levelling works.
- Drilling and pile installations.
- Reworking of the rain damaged portions of the access road.
- Construction of the temporary stormwater berm.
- Installation of torque tubes.
- Trench excavation works for cables.

#### 3.1 General Outstanding matters

Any major outstanding matters are to be recorded and summarised in the Concerns Register (**Annexure A**). The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

#### 3.2 Audits (Internal and External)

Internal audits are undertaken monthly by the Red Rocket ESCO. This ECO Audit was undertaken on the 23<sup>rd</sup> of July 2025. Audit tables/checklists are attached to this report. The ECO undertakes external monthly audits.

## 4 WASTE MANAGEMENT

The contractor must make provision for waste avoidance, minimisation, and separation of waste where possible through recycling efforts. Waste management awareness must be done on an ongoing basis and must be provided through toolbox talks and awareness posters. A waste station is under construction at V3 where waste will be temporarily stored, stored and recycled. The waste station includes a bund where waste will be stored and various compartments where waste will be sorted into. The contractor must ensure that the waste area has a roof to protect waste from weather elements. Additionally, the compartment must be on an impervious surface to prevent accidental spillages onto the soil. Recyclables are being stored until there are enough quantities. Recycling will be done at Mpact.

### 4.1 Domestic/ General Waste

Approximately **290 kg** of general waste was removed from site in the month of July 2025. Designated waste areas have been provided at the contractors' main site offices/laydown areas for purposes of temporary storage of waste prior to collection and transfer to the licensed waste facilities. Bins at the laydown area are colour coded for each waste type. The contractor has commenced with taking waste for recycling.

The service providers dispose the general waste at Matjhabeng Local Municipality waste disposal site-Licence number: B33/2/340/21/P8 16/2/7/C404/D2/Z1/P367. Proof of disposal is available on request.

### 4.2 Hazardous waste

Hazardous waste skips are available at the dedicated waste storage area at each of the sub-contractors' site offices/lay down areas. No hazardous waste was disposed of in July 2025. Hazardous waste in form of oil spillages, cement spillages and contaminated soil is kept onsite until there is enough to dispose. Although spillages have been recorded on site, they are fewer than in the previous months. To continue to reduce the number of spillages the ESCO together with the contractors Environmental Officer must re-train workers on spillages, ensure all vehicles are serviced and only road worthy are allowed onsite.



### 4.3 Wastewater

Approximately **76670.5 L** of sewerage waste was generated on site in the month of July 2025. Chemical toilets and a conservancy tank have been provided onsite. Fewer incidents spillages from the chemical toilets have been recorded this month as compared to the previous months. The contractor must ensure these chemical toilets are serviced regularly and drip trays are placed under each toilet.

The General Authorisation that was issued by DWS for the includes the use of a conservancy tank up to a capacity of 50 000l. The conservancy tank onsite has a capacity of 12 500l which is below the stipulated GA threshold. The contractor must ensure that this capacity is not exceeded.

The Appointed Service Provider removes sewage and disposes of it at Matjhabeng Local Municipality wastewater treatment facility - Licence No: 10/D4/J/G/2082. Proof of disposal is available onsite. The contractor must ensure the appointed service provider is licenced to provide sewer removal services. With the work being spread out the contractor must ensure ablutions are within walking distance within the areas where people are working.

## 5 PROTECTIVE MEASURES

### 5.1 General

Protective measures have been deployed to mitigate environmental impacts or prevent impacts from occurring which includes:

- Security guards are present on the site, with access control in place.
- Induction training is conducted for all persons working and visiting the site.
- Snake gaiters are provided.
- Spill kits are available on site.
- No-go areas are demarcated and provided with signage.
- Access cards are used to enter and exit the site.
- Rapid alcohol detecting is in place.

## 6 ENVIRONMENTAL CONSERVATION

### 6.1 Conservation of Flora and Fauna

A permit to clear the site and relocate species of concern was received from the Free state Department of Economic, Small Business Development, Tourism and Environmental Affairs. The permit with Ref No. 202306000012649 was issued on 08/06/2023 to pluck protected and unprotected flora.

Clearance of alien vegetation has is in progress, however the pace at which the contractor is removing alien vegetation is concerning especially with the onset of rains is expected in September. The contractor must monitor the cleared areas to ensure alien vegetation does not re-establish. It is important that the contractor clears all the alien vegetation as some of the alien plants will soon be dispersing seed creating a seed bank. This will make complete eradication of these plants difficult in the long term. The contractor must make an effort to remove the stockpiled alien vegetation to the Matjhabeng Local Municipality for disposal

### 6.2 Water Management

Approximately **882 m<sup>3</sup>** of water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The GA allows for abstraction of 43 000m<sup>3</sup> annually, the contractor must ensure water abstraction does not exceed the licenced volumes. Tanks and pipes must be monitored on an ongoing basis.

Wastewater from the provided drinking water container (at V2) was found flowing on the ground creating nuisance. It was noted that this occurs during lunch time when workers wash their hands. A bigger container must be provided to capture the water, and the captured water be used for dust suppression on the site camp area.

### 6.3 Soil Management

Cleared topsoil must be protected from erosion and alien vegetation establishment. Alien vegetation has established on the stockpiles and must be cleared. The contractor has commenced with moving the excess topsoil to an area near the main gate. Care must be taken that topsoil is not compacted in the process as is happening on the V1 area. All measures as outlined in the approved method statement must be adhered to. At V1 the trucks were driving over topsoil which resulted in compaction of the topsoil.

At the V2 area it was noted that oil spillages were covered with soil, instead of the contaminated soil being scooped out for proper disposal. Some trucks are left without drip trays resulting in oil spillage. Additional, truck that are parked at the main gate before inspection must be equipped with drip trays.

#### **6.4 Stormwater and Erosion onsite**

The contractor's Stormwater Management Plan was approved, measures to manage erosion as per the approved SWMP have been implemented to prevent erosion and water ponding.

## **7 INFRASTRUCTURE MANAGEMENT**

### **7.1 Access Roads**

The project team is using existing farm roads for current construction activities until such time as the project access roads and internal roads have been constructed. The contractor has graded the access roads to address the effects water ponding and erosion. Maintenance of the access roads must be done on a regular basis.

### **7.2 Fences, Gates, and Barricading**

The site is fenced with security personnel manning the gates. Access cards are used to allow entrance to site. Barricading was observed on site, and such should continue to be maintained around all open excavations to prevent potential fauna (wildlife and livestock) incidents. The contractor must ensure trenches for cables on are barricaded at the end of each working day. The contractor is advised to work on small sections at a time to ensure that there is enough material to barricade the open trenches

### **7.3 Buildings and Structures**

Containers have been established on site by various subcontractors that are being used as offices. Male and female ablution facilities have been provided. Chemical toilets and a conservancy tank are used to manage sewer onsite. The contractor has completed the construction of a diesel and chemical bund on V2 area. The contractor must ensure the bund meets the requirements such as ventilation and capacity as outlined in the EMP. A waste station has established at V3. The waste station will constitute a bunded areas for the storage of hazardous waste and various compartments where waste will be segregated into.

## **8 SOCIAL RESPONSIBILITY**

Any complaints from the public are to be recorded on complaints register maintained by the Contractor whose responsibility it is to track and resolve the complaints/issues that are raised. In addition, a box for receiving internal grievances is present at the main site office facility which allows for project staff to bring to the attention of the project management team any comments and or concerns.

## 9 ENVIRONMENTAL AWARENESS AND TRAINING

The contractor has undertaken Toolbox talks for the month of July 2025 covering the following topics:

- Fuelling and Maintenance Procedure
- Fire Prevention and Control
- Handling & Storage of Hazardous Chemical Agents
- Impacts of Pollution on the Environment
- Waste Management
- Spill Prevention
- Working within the Project's footprint
- Importance of drip tray
- Preventing air pollution
- Fauna and Flora Management
- Housekeeping on Trucks
- Environment compliant refuelling on site.
- No use of Danger tape on site
- Chance find procedure
- Keep your environment Clean / housekeeping
- Report Environmental Hazards Immediately
- Pollution Prevention: Cement & Concrete
- Maintaining clean & safe toilet facilities – A shared responsibility
- Waste Disposal on site
- Incident & Accident Reporting
- Topsoil Management

## 10 HERITAGE

In the event of any unknown artefacts being uncovered during construction, the ESCO and Project Manager must be informed immediately who must then instruct work to be stopped in the immediate area and then promptly report the discovery/finding to the ECO, a heritage specialist and the relevant heritage authority to investigate and confirm if such discovery is in fact a heritage artefact of any significance. No activities impacting upon any heritage sites were reported during this reporting period.

A barricade net was placed around the graves near the main gate to ensure the site is not disturbed by trucks moving excess topsoil.

## 11 WARNING & NCRS

No NCR reports were issued by the ECO in the month of July 2025.

## 12 REHABILITATION

No rehabilitation works have commenced during this period, further rehabilitation is expected to occur on the project as and when other works have been completed.

## 13 INCIDENTS AND ACCIDENTS

All environmental related events, incidents and accidents are to be reported directly to the ECO and kept on a central register and included in the monthly report. No environmental incidents that are reportable under Section 30 of the NEMA occurred in July 2025. A register of environmental incidents is attached as **Annexure C**.

## 14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 23<sup>rd</sup> of July 2025 with observations documented in this report. Monthly ECO compliance reports are submitted to the Department (**DFFE**) by the ECO.

## 15 AUDIT METHODOLOGY

This section provides an overview of the methods employed in making observations and providing recommendations and conclusions derived from the audit procedures undertaken.

### 15.1 Audit Process

The site visit, data reviews and report drafting were undertaken by the ECO/auditor. The audit included the following procedures:

- **Site Inspections.** The areas and aspects covered during the inspections with concurrent discussions with the ESCO and site-based representatives of the EA holder included *inter alia*:
  - i. Access control to the sites.
  - ii. Ecologically sensitive areas, where applicable.
  - iii. Waste management.
  - iv. Incident and complaints management.
  - v. Landowner relations.
  - vi. Infrastructure management.
  - vii. Environmental Awareness.
  - viii. Record-keeping and document control.
  - ix. Stormwater and Erosion management
- **Documentation review.** This included:
  - i. A review of the EAs, EMPs and where applicable, method statements.
  - ii. A review of previous audit reports, records, observations, and findings.
  - iii. A review of any remedial and/or protective measures implemented.
  - iv. Identification, if applicable, any gaps requiring action and/or rectification.
- **Audit Report compilation.** This included:
  - i. Recording any observations and findings identified during the audit.
  - ii. Providing recommendations relating to improvement or non-compliance, if and where applicable.

## 15.2 Observation and Recommendation Determination

Observations and subsequent recommendations were based on and are limited to the following:

- i. Available documentation and records viewed or received prior, subsequent, or during the site visit.
- ii. Observations made during the period that the ECO/auditor was on site; and
- iii. Information received from both direct and cross-referenced discussions with permanent site-based staff.

## 15.3 Findings

Any key findings highlighted in this report will indicate areas and/or aspects that require improvement or rectification. The purpose of summarising the findings is to allow the EA holder to identify common management challenges that effect the level of compliance to the conditions of the EAs and EMPrs.

Where findings and recommendations pertaining are deemed significant through compliance status or performance, they are documented as specific issues in the report. All site-specific observations are recorded in the corresponding audit checklist tables.

## 15.4 Audit Tables and Compliance Ratings

The audit table captures observations and recommendations made in relation to the conditions stipulated in the EAs and EMPrs. It provides the reader with more detailed information in terms of what the stipulated requirements are in relation to the organisation's assessed current compliance status, according to the observations recorded by the auditor.

Ratings are calculated based on a scoring system whereby each auditable condition is provided with a score as highlighted in **Table 3** below.



**Table 4:** Compliance rating and scoring.

| Status                              | Compliance Rating |         | Description                                                                                                                                                                                |
|-------------------------------------|-------------------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | Abbreviation      | Scoring |                                                                                                                                                                                            |
| <i>Compliant</i>                    | C                 | 2       | <i>No improvements required</i>                                                                                                                                                            |
| <i>Partially Compliant</i>          | PC                | 1       | <i>Minor improvements required</i>                                                                                                                                                         |
| <i>Non-Compliant</i>                | NC                | 0       | <i>Major improvements required</i>                                                                                                                                                         |
| <i>Work in Progress</i>             | WiP               | -       | <i>Environmental management measures are underway but not yet fully implemented or verified, requiring further monitoring and assessment.</i>                                              |
| <i>Not Applicable / Not Audited</i> | NA                | -       | <i>No improvements required and / or the condition is either not, not yet or no longer relevant at the time of the audit</i>                                                               |
| <i>Informative</i>                  | info              | -       | <i>These relate to informative elements that provide either useful information or are descriptive in the explanation and understanding of statements or concepts in the audit criteria</i> |

Each condition has been ascribed a colour-coded status indicator of Compliant (green), Partially Compliant (orange), major-compliant (red), Not Auditable/Audited (grey), Work in Progress (light red) and Informative (blank/white) to assist the reader in determining aspects that require attention to improve on compliance achieved, if and where applicable. No compliance scoring is attributed any of the audit criteria information pertaining to the following three audit status symbols, namely 'NA', 'WiP', and 'info' as they were either not auditable and/or were not applicable/relevant at the time the audit was undertaken. In other words, they are excluded from the overall compliance rating calculations.

An overall compliance rating is calculated as a percentage to provide the reader with an overview of compliance to the relevant audit criteria however each condition should be considered on its own merits as the ratings do not necessarily portray the severity or impact of the reported finding relating to a condition.

## 16 ASSUMPTIONS AND LIMITATIONS

The ECO compliance audit and associated report are based upon the assumptions that:

- i. Documentation provided to the ECO/auditor is factual and true.
- ii. The audit is based purely on the conditions as stipulated in the EAs and EMPs.
- iii. The construction phase is currently underway and operational phase activities are not applicable.
- iv. Documentation / reports were randomly sampled / reviewed in order to accommodate time constraints.
- v. Where visual observations were not possible either due to physical access constraints or safety constraints, the ECO/auditor used other means to determine compliance, either through requesting written evidence provided by contractors / service providers who service the site or via interviews with technical site-based staff.

## 17 CONSULTATION PROCESS

The approach of consultation followed during the environmental audit was based on written (email) and telephonic correspondence between the ECO/auditor and the Environmental Site Compliance Officer which also includes consultation and communication with the EA holder and competent authority in terms of report submission.

## 18 FINDINGS

Findings are listed in the attached checklists, and it should be noted that findings should be considered individually in the context of the full audit and each condition and associated rating.

The following findings were noted onsite:

- Clearance of alien vegetation partly done on the fields and stockpiles
- Some standing equipment did not have drip trays.
- Cigarette buds were found on the ground.
- Some trenches were not barricaded.
- Water from the drinking water bottle was not captured creating a nuisance.
- Oil spillages were covered with soil.
- Excess topsoil is being moved.
- Heritage area is barricaded.
- Waste recycling now taking place on site.
- Topsoil stockpiles were driven over by trucks.
- Waste area concrete slab not bunded.

Based on the outcomes of the audit it was established that the objectives of the EAs and EMPs were achieved in terms of:

- i. *Sufficiently providing for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis.*
- ii. *Ensuring compliance with the provisions of environmental authorisation and EMPs.*

### 18.1 Minor improvements required.

- Ensuring smoking is done at designated areas.
- The slab at the waste area must be bunded.

### 18.2 Major improvements required.

- Clearance of all alien vegetation must progress faster before the onset of rains.

- Oil spillages must be removed and not covered up.
- Trenches must be barricaded.

## 19 AUDIT SUMMARY

In terms of the findings and results of the **July 2025** ECO audit, the project achieved an overall **98.8%** compliance rating with the conditions of the EAs and EMPs.

**Table 4:** Compliance Scoring

| No.                                       | Audit criteria                                                                             | Compliant (C) | Partially Compliant (PC) | Major-non-Compliant (NC) | Work in Progress | Normative (info) | Not Applicable / Not Audited (NA) | Percentage Score      |
|-------------------------------------------|--------------------------------------------------------------------------------------------|---------------|--------------------------|--------------------------|------------------|------------------|-----------------------------------|-----------------------|
| 1                                         | Environmental Authorisation for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1) | 25            | 0                        | 0                        | 1                | 19               | 3                                 | (100%)                |
| 2                                         | Environmental Authorisation for Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)   | 25            | 0                        | 0                        | 1                | 20               | 2                                 | (100%)                |
| 3                                         | Environmental Authorisation for Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)   | 25            | 0                        | 0                        | 1                | 20               | 2                                 | (100%)                |
| 4                                         | EMPr for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)                        | 261           | 14                       | 2                        | 0                | 14               | 29                                | (97%)                 |
| 5                                         | EMPr Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)                              | 256           | 12                       | 2                        | 0                | 15               | 31                                | (97%)                 |
| 6                                         | EMPr Virginia 3 Solar Park (DFFE REF NO: 14/12/16/3/3/2/2101)                              | 228           | 12                       | 2                        | 0                | 41               | 39                                | (98%)                 |
| Overall total no. conditions              |                                                                                            | 817           | 36                       | 0                        | 3                | 129              | 106                               |                       |
| Audited conditions                        |                                                                                            | 1634          | 35                       | 0                        | -                | -                | -                                 | (Potential max score) |
| Overall Compliance Rating Calculation (%) |                                                                                            | 98.8%         |                          |                          |                  |                  |                                   |                       |

## 20 . RECOMMENDATIONS

**Based on the findings identified the following is recommended:**

- Alien vegetation clearance must continue onsite, more resources must be allocated towards alien vegetation removal.
- All trenches must be barricaded at the end of each working day.
- All equipment must be equipped with a drip tray.
- Spillages must be cleaned promptly
- Truck drivers must be trained on handling topsoil
- Smoking must be done at designated areas.
- The waste area slab must be bunded.

## 21 CONCLUSION

The contractor must ensure that systems and resources to monitor and manage environmental risks and impacts adequately are in place. Resources and personnel to train employees on the contents of the EMPs must be made to ensure that the project runs effectively and efficiently with minimal impact to the biophysical and socio-economic environment.

In general, the EMPs are effective in their current format in terms of content and relevance and there are no major shortcomings. The EMP's sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with this project.

**PREPARED BY:**

A handwritten signature in black ink, appearing to read 'Sakaunda'.

**Sakaunda Jennipher**

Environmental Control Officer

NCC Operations (Pty) Ltd

**M** ·069 510 7630

**E** · [jenniphers@ncc-group.co.za](mailto:jenniphers@ncc-group.co.za)

**REVIEWED BY:**

A handwritten signature in black ink, appearing to read 'Nick Gates'.

**Nick Gates**

Senior Environmental Consultant

NCC Operations (Pty) Ltd

**M** ·073 1998 431

**E** ·[nickg@ncc-group.co.za](mailto:nickg@ncc-group.co.za)

## ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

### Open Concerns/Complaint

| No | Observation date | Concern/Complaint | Suggested Due Date <sup>1</sup> | Proposed Corrective Action | Status | Closure status |
|----|------------------|-------------------|---------------------------------|----------------------------|--------|----------------|
|    |                  |                   |                                 |                            |        |                |

*\*The concerns register is updated once the ECO is present on site.*

### Closed Concerns

| No | Observation date | Concern/Complaint | Due Date suggested by ECO | Corrective Action Taken | Outcome | Closure status |
|----|------------------|-------------------|---------------------------|-------------------------|---------|----------------|
|    |                  |                   |                           |                         |         |                |
|    |                  |                   |                           |                         |         |                |

## ANNEXURE B - NCR REGISTER

| Ref No. | Originator | Dated Issued | Description | Proposed Corrective Action | Closure Status | Closure Date | Further Action Required |
|---------|------------|--------------|-------------|----------------------------|----------------|--------------|-------------------------|
|         |            |              |             |                            |                |              |                         |

## ANNEXURE C - INCIDENT REGISTER

| Date       | Type                                                                                           | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                       | Volume                                         | Remedial Action                                              |                                                                                |
|------------|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna &Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                                                 |                                                | Immediate<br>Corrective<br>Actions                           | Preventative<br>measures                                                       |
| 20/03/2025 | Waste water                                                                                    | Soil pollution                                                                               | On 20, 2025, at approximately 8:28, the conservative tank being used to collect wastewater from conservancy tank had overfilled, and a Spillage had occurred spillage of approximately 8-10 litres of wastewater mixed with the cleaning material. the toilet supplier attended to the spill immediate & initiated spill Clean-up. Contaminated soil was taken to the hazardous waste skip.   | 10 l<br>(below<br>Section<br>30<br>threshold ) | Clean- up must be done as soon as the spills are identified. | The conservancy tank must be emptied more frequently to reduce overfilling.    |
| 19/03/2025 | Waste water                                                                                    | Soil pollution                                                                               | Approximately 12 litres of wastewater mixed with the cleaning chemicals where toilets are located. The toilet had been leaking since the previous day and wastewater was contained in a drip tray. The toilet supplier was notified, and he came to service<br><br>The toilets; however, during servicing; the drip tray spilled over causing the spillage of the wastewater onto the ground. | 12l<br>(below<br>Section<br>30<br>threshold )  | Clean- up must be done as soon as the spills are identified. | Leaking toilets must not be allowed onsite.                                    |
| 08/03/2025 | Diesel spillage                                                                                | Soil pollution                                                                               | On 08 March 2025 at 05:30, security supervisor discovered a diesel leakage during the morning patrol. The spillage occurred due to the diesel injectors that were                                                                                                                                                                                                                             | 20l<br>(below<br>Section<br>30<br>threshold )  | Clean- up must be done as soon as the spills are identified  | Vehicles must be maintained regular. only road worthy vehicles must be onsite. |



| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                 | Volume                                   | Remedial Action                                             |                                                                                |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                              |                                          | Immediate Corrective Actions                                | Preventative measures                                                          |
|            |                                                                                  |                                                                            | loose one of them was not properly fitted and diesel pressure removed them while the bakkie was in motion.                                                                                                                                                                                                                                                              |                                          |                                                             |                                                                                |
| 07/03/2025 | Water and antifreeze                                                             | Soil pollution                                                             | The Driver parked the minibus on site, shortly a leak observed containing a mixture of water and antifreeze, while also exhibiting signs of overheating.                                                                                                                                                                                                                | -                                        | Clean- up must be done as soon as the spills are identified | Vehicles must be maintained regular. only road worthy vehicles must be onsite. |
| 06/05/2025 | Water mixed with antifreeze spillage                                             | Soil pollution                                                             | On 6 May 2025 at 14:00, the TLB Operator was busy moving spoil material near the access road to the allocated spoil Stockpile area, when the TLB, radiator fan belt snapped & the container that stores water & antifreeze busted. Approximately 5 Liters of water with antifreeze spilled                                                                              | 5 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.                  |
| 08/05/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | A chemical toilet in PV3 at the laydown area at around 3:53 pm, 08 May 2025 was reported to be leaking, when the toilet was assessed, it was identified that there was a broken pipe that leaked the chemical water. An immediate action was taken to clean up the spillage. The contaminated soil was collected into the bags and taken to site waste management area. | 6 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent.         |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                   | Volume                                            | Remedial Action                                             |                                                                        |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                             |                                                   | Immediate<br>Corrective<br>Actions                          | Preventative<br>measures                                               |
| 12/05/2025 | Diesel spillage                                                                                 | Soil pollution                                                                               | On 12-05-2025 at 06:40, the ambulance was on the way to the access control point along the main access road, when it had a sudden breakdown and diesel was spilled along the access road, leaving a trail of diesel spill for approximately +400 Metres. Approximately +2 Litres of diesel was spilled                                                                                                                                                    | 2 litres<br>(below<br>Section<br>30<br>threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.          |
| 15/05/2025 | Hydraulic oil spillage                                                                          | Soil pollution                                                                               | On the 15/05/2025, a side tipper truck was transporting spoil material when the cylinder failed and spilled ~7 litres of hydraulic oil, about 455m from the nearest watercourse. The contaminated soil was promptly cleaned up.                                                                                                                                                                                                                           | 7 litres<br>(below<br>Section<br>30<br>threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.          |
| 20/05/2025 | Toilet Cleaner mixed with water spillage                                                        | soil pollution                                                                               | It was around 11:30 am when it was reported that there was a spillage, that when the Fidamo team was about to clean the toilets at Pv1 Laydown area, a pipe from the generator busted and the water leaked from the broken pipe. The water that spilled was approximately 3-4 Liters and the pipe was immediately stopped. The chemical that was in the water is blue splash Toilet chemical. An immediate action was taken to clean up the spillage. The | 4 litres<br>(below<br>Section<br>30<br>threshold) | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                 | Volume                                                                 | Remedial Action                                                                                            |                                                                                                               |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                              |                                                                        | Immediate Corrective Actions                                                                               | Preventative measures                                                                                         |
|            |                                                                                  |                                                                            | contaminated soil was collected into the bags and taken to site waste management area.                                                                                                                                                                                                                                                                                                                                  |                                                                        |                                                                                                            |                                                                                                               |
| 21/05/2025 | Fauna                                                                            | Loss of biodiversity                                                       | On the 21/05/2025 a snake was fatally wounded during the internal road construction works.                                                                                                                                                                                                                                                                                                                              | N/A                                                                    | The dead animal was buried.                                                                                | N/A                                                                                                           |
| 26/05/2025 | Hydraulic oil spillage                                                           | Soil pollution                                                             | On 26/05/2025, at around 16:50 a drill rig operator noticed a leak from the machine, he immediately reported the leak to the supervisor. The supervisor called the mechanic but did not report the spillage. The oil further spilled to the soil during the repair attempts which were done under poor lighting. The spillage was left overnight and was only reported to the EO the next morning when the shift began. | 25 litres<br>(below Section 30 threshold)                              | Clean- up must be done as soon as the spills are identified.                                               | The ESCO issued NCR to the subcontractor for failing to report spillage immediately.                          |
| 11/06/2025 | Concrete and oil Spillage                                                        | Soil pollution                                                             | On the 11 <sup>th</sup> of June 2025 the concrete mixer truck overturned resulting in the spillage of an estimated 3m3 (3 cubic meters) of concrete and approximately 8litres of diesel. The contractor removed the spilled concrete and dumped it on the natural area adjacent to the road                                                                                                                             | 8 litres of diesel and 3m3 of concrete<br>(below Section 30 threshold) | Clean- up must be done as soon as possible and an investigation must be done on the cause of the accident. | The ESCO issued an NCR to the subcontractor for failing to report dumping concrete on the natural vegetation. |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                             | Volume                                             | Remedial Action                                                                                     |                                                                                                  |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|-----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                       |                                                    | Immediate<br>Corrective<br>Actions                                                                  | Preventative<br>measures                                                                         |
| 16/06/2025 | Toilet Cleaner mixed with water spillage                                                        | Soil pollution                                                                               | At 08:32am, on the 16th of June 2025, The Client (Robin) reported that ABLON's Ablution facilities were leaking which resulted to soil contamination, we immediately stopped everyone from using the Toilet and reported the issue to our service provider. A drip tray was placed immediately underneath the toilet. The event occurred at the OHL Site Camp and the name of the chemical that spilled on the ground is Portabloo Toilet Chemical. | 30 litres<br>(below<br>Section<br>30<br>threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 24/06/2025 | Toilet Cleaner mixed with water spillage                                                        | Soil pollution                                                                               | At around 8 am on the 24/06/2025 a spillage was reported by the contractor. Approximately 30 litres of Toilet Blue was spilled at the Virginia 1 laydown area. The spillage was cleaned up and the contaminated soil removed for disposal.                                                                                                                                                                                                          | 30 litres<br>(below<br>Section<br>30<br>threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 08/07/2025 | Hydraulic Oil Spillage                                                                          | Soil pollution                                                                               | A tipper truck spilled some hydraulic oil when the driver was offloading some excavated material at PV2 I8 road on the 08h of July 2025. The driver lifted the truck to off load the material when it was half way up, he discovered that the body of the truck was swinging to the sides and he tried to stop, and discovered some oil                                                                                                             | 30 litres<br>(below<br>Section<br>30<br>threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | Vehicles that are constantly breaking down must be moved off site.                               |

| Date | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                        | Volume | Remedial Action                    |                          |
|------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|------------------------------------|--------------------------|
|      | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                  |        | Immediate<br>Corrective<br>Actions | Preventative<br>measures |
|      |                                                                                                 |                                                                                              | leaks from the hydraulic cylinder, about +-9 litres of oil spilled to the ground and it was reported to the EO, immediately the supervisor and the driver cleaned the spillage and the contaminated soil was collected into bags and taken to ABC Solar Waste management area. |        |                                    |                          |

## ANNEXURE D – PHOTOGRAPHS

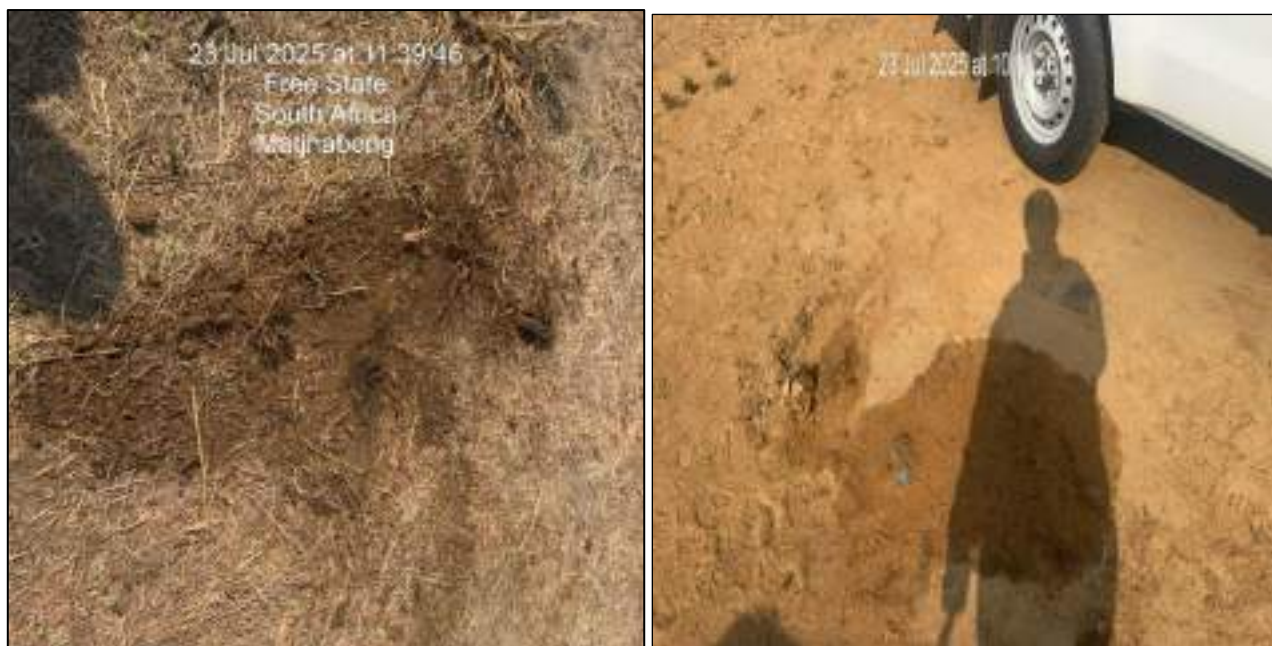


**Figure 1:** Oil spillages.



**Figure 2:** Nuisance due to water spillage





**Figure 3:** Concrete that must be removed from the construction area for disposal.



**Figure 4:** Cigarette buds found on the ground.





**Figure 5:** Barricaded heritage area



**Figure 6:** Alien vegetation.



**Figure 7:** Truck driving over topsoil stockpile.



**Figure 8:** Trucks with no drip Trays



**Figure 9:** On -going Clearance of Alien Vegetation

**THIS PAGE WAS INTENTIONALLY LEFT BLANK**

**AUGUST 2025**





---

# ECO MONTHLY ENVIRONMENTAL MONITORING REPORT

Virginia OHL Line and Switching Station Matjhabeng,  
Lejweleputswa District Municipality within the jurisdiction  
of the Free State Province.

---

**PREPARED FOR:**

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

Department of Forestry, Fisheries, and the Environment: Compliance Monitoring

**DATED:**

August 2025

**PREPARED BY:**

NCC Operations

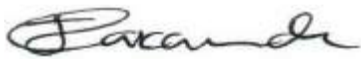
**T** • 021 702 2884

**E** • [info@ncc-group.co.za](mailto:info@ncc-group.co.za)

## DECLARATION OF INDEPENDENCE

I, Jennipher Sakaunda, as duly authorised representative of NCC Operations (Pty) Ltd ("**NCC**"), hereby confirm my independence (as well as that of NCC) as an auditor and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which URSA Energy (Pty) Ltd has appointed NCC as Environmental Control Officer ("**ECO**"), other than fair remuneration for work performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'J Sakaunda', is positioned below the 'Signed:' text.

**Jennipher Sakaunda**

03 September 2025

Environmental Control Officer

NCC Operations (Pty) Ltd

## **LIABILITY DISCLAIMER AND CONFIDENTIALITY CLAUSE**

All inspections conducted, as well as reports and recommendations provided by NCC are purely advisory. They are primarily intended for the purpose of assisting clients in loss control, risk management as well as health, safety, and environmental procedures.

Observations and recommendations are the result of practices and conditions observed, and information made available to us in various forms at the time of our visit. They do not purport to refer to or guarantee compliance with local or government regulations which may be applicable to such practices and conditions. This report should not be considered a definitive listing of all existing risks nor an absolute solution to all indicated risks, or hazards present from time to time in the Client Organisation. The report should always be considered in its entirety; individual sentences, paragraphs or sections of the report should not be used in isolation.

This report should not be reproduced except in its entirety, including this liability disclaimer or contents reproduced or disclosed to any third party without the prior written approval of NCC.

NCC assumes no responsibility for any losses incurred as a result of the implementation, management, and operation of recommended health, safety and environmental systems, processes and procedures.



## DOCUMENT CONTROL

|                     |                                             |
|---------------------|---------------------------------------------|
| <b>REPORT TITLE</b> | Monthly ECO Environmental Monitoring Report |
| <b>PROJECT</b>      | Virginia OPL Line and Switching Station     |
| <b>LOCATION</b>     | Free State Province                         |
| <b>EA HOLDER</b>    | URSA Energy (Pty) Ltd                       |
| <b>ECO</b>          | NCC Operations (Pty) Ltd                    |
| <b>REVISION</b>     | 00                                          |
| <b>DATE</b>         | 03/09/2025                                  |

| Revision | Date       | Description                  |
|----------|------------|------------------------------|
| Rev 00   | 03/09/2025 | First Draft - Internal       |
| Rev 01   | TBC        | Final - Authority submission |

## REPORT DISTRIBUTION LIST

| Name                   | Organisation                      | Issued     | Format     |
|------------------------|-----------------------------------|------------|------------|
| Janine Brasington      | Red Rocket South Africa (Pty) Ltd | 03/09/2025 | Electronic |
| Serina Pillay          | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Maggie Logan           | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Director of Compliance | DFFE                              | TBC        | Electronic |

## TABLE OF CONTENTS

|                                                    |           |
|----------------------------------------------------|-----------|
| <b>TABLE OF FIGURES .....</b>                      | <b>7</b>  |
| <b>ABBREVIATIONS .....</b>                         | <b>8</b>  |
| <b>1 INTRODUCTION .....</b>                        | <b>9</b>  |
| 1.1 Background.....                                | 9         |
| 1.2 Audit Scope and Purpose.....                   | 11        |
| 1.3 Monitoring Frequency and Reporting.....        | 11        |
| <b>2 AUDITOR BACKGROUND. ....</b>                  | <b>12</b> |
| <b>3 GENERAL (NOTABLE EVENTS) .....</b>            | <b>13</b> |
| 3.1 General Outstanding matters.....               | 13        |
| 3.2 Audits (Internal and External).....            | 13        |
| <b>4 WASTE MANAGEMENT.....</b>                     | <b>14</b> |
| 4.1 Domestic/ General Waste.....                   | 14        |
| 4.2 Hazardous waste.....                           | 14        |
| 4.3 Wastewater .....                               | 14        |
| <b>5 PROTECTIVE MEASURES .....</b>                 | <b>15</b> |
| 5.1 General .....                                  | 15        |
| <b>6 ENVIRONMENTAL CONSERVATION.....</b>           | <b>16</b> |
| 6.1 Conservation of Flora and Fauna.....           | 16        |
| 6.2 Water Management.....                          | 16        |
| 6.3 Soil Management .....                          | 16        |
| 6.4 Stormwater and Erosion onsite .....            | 16        |
| <b>7 INFRASTRUCTURE MANAGEMENT.....</b>            | <b>17</b> |
| 7.1 Access Roads.....                              | 17        |
| 7.2 Fences, Gates, and Barricading.....            | 17        |
| 7.3 Buildings and Structures .....                 | 17        |
| <b>8 SOCIAL RESPONSIBILITY.....</b>                | <b>17</b> |
| <b>9 ENVIRONMENTAL AWARENESS AND TRAINING.....</b> | <b>18</b> |
| <b>10 HERITAGE.....</b>                            | <b>18</b> |
| <b>11 WARNING &amp; NCRS.....</b>                  | <b>18</b> |

|           |                                                        |           |
|-----------|--------------------------------------------------------|-----------|
| <b>12</b> | <b>REHABILITATION .....</b>                            | <b>19</b> |
| <b>13</b> | <b>INCIDENTS AND ACCIDENTS .....</b>                   | <b>19</b> |
| <b>14</b> | <b>MEETINGS AND OTHER CORRESPONDANCE.....</b>          | <b>19</b> |
| <b>15</b> | <b>AUDIT METHODOLOGY.....</b>                          | <b>20</b> |
| 15.1      | Audit Process.....                                     | 20        |
| 15.2      | Observation and Recommendation Determination.....      | 21        |
| 15.3      | Findings.....                                          | 21        |
| 15.4      | Audit Tables and Compliance Ratings .....              | 21        |
| <b>16</b> | <b>ASSUMPTIONS AND LIMITATIONS .....</b>               | <b>23</b> |
| <b>17</b> | <b>CONSULTATION PROCESS.....</b>                       | <b>23</b> |
| <b>18</b> | <b>FINDINGS .....</b>                                  | <b>24</b> |
| 18.1      | Minor improvements required. ....                      | 24        |
| 18.2      | Major improvements required.....                       | 24        |
| <b>19</b> | <b>AUDIT SUMMARY.....</b>                              | <b>25</b> |
| <b>20</b> | <b>RECOMMENDATIONS .....</b>                           | <b>26</b> |
| <b>21</b> | <b>CONCLUSION.....</b>                                 | <b>26</b> |
|           | <b>ANNEXURE A – CONCERNS/COMPLAINTS REGISTER .....</b> | <b>28</b> |
|           | <b>ANNEXURE B - NCR REGISTER .....</b>                 | <b>28</b> |
|           | <b>ANNEXURE C - INCIDENT REGISTER.....</b>             | <b>29</b> |
|           | <b>ANNEXURE D – PHOTOGRAPHS .....</b>                  | <b>35</b> |
|           | <b>THIS PAGE WAS INTENTIONALLY LEFT BLANK .....</b>    | <b>40</b> |

## TABLE OF FIGURES

|                                                                      |    |
|----------------------------------------------------------------------|----|
| Figure 1: Groundwater encounter on some of the pits. ....            | 36 |
| Figure 2: Wetland that has been transversed by trucks . ....         | 36 |
| Figure 3: Cigarettes buds on the ground. ....                        | 37 |
| Figure 4: Alien vegetation on the topsoil stockpiles.....            | 37 |
| Figure 5: Dust observed on the access roads. ....                    | 38 |
| Figure 6: Large quantities of wood pallets .....                     | 38 |
| Figure 7: Stored barricade material to be used at the trenches. .... | 39 |
| Figure 8: Waste bund construction in place .....                     | 39 |

## ABBREVIATIONS

|             |                                                         |
|-------------|---------------------------------------------------------|
| <b>BAR</b>  | Basic Assessment Report                                 |
| <b>CA</b>   | Competent Authority                                     |
| <b>DEA</b>  | Department of Environmental Affairs (now DFFE)          |
| <b>DFFE</b> | Department of Forestry, Fisheries, and the Environment  |
| <b>DWS</b>  | Department of Water and Sanitation                      |
| <b>EA</b>   | Environmental Authorisation                             |
| <b>EAP</b>  | Environmental Assessment Practitioner                   |
| <b>ECO</b>  | Environmental Control Officer                           |
| <b>EIA</b>  | Environmental Impact Assessment                         |
| <b>EMPr</b> | Environmental Management Programme                      |
| <b>EO</b>   | Environmental Officer (Contractor)                      |
| <b>ER</b>   | Employer's Representative                               |
| <b>ESCO</b> | Environmental Site Compliance Officer                   |
| <b>kV</b>   | Kilovolt                                                |
| <b>MVA</b>  | Megavolt Amperes                                        |
| <b>MW</b>   | Megawatt                                                |
| <b>NCC</b>  | NCC Operations                                          |
| <b>NCR</b>  | Non-Compliance Report                                   |
| <b>NEMA</b> | National Environmental Management Act (No. 107 of 1998) |
| <b>NWA</b>  | National Water Act (No. 36 of 1998)                     |
| <b>OHPL</b> | Overhead Power Line                                     |
| <b>SDC</b>  | Safe Disposal Certificate                               |
| <b>SHE</b>  | Safety, Health, and Environment                         |
| <b>SS</b>   | Substation                                              |
| <b>TBC</b>  | To Be Confirmed                                         |

# 1 INTRODUCTION

## 1.1 Background

NCC Operations (Pty) Ltd ("**NCC**") was appointed by URSA Energy (Pty) LTD ("**URSA**") to provide a suitably experienced independent Environmental Control Officer ("**ECO**") for the construction phase of Virginia Solar Park which will be connected to the Eskom Theseus Main Transmission Substation (MTS). The site is located on Farm Blomskraal 216, Ventersburg RD located within the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province. On completion the facility will consist of the Photovoltaic (PV) Power Plant with a maximum generation capacity up to 100 MW, a 132kV powerline connecting the substation to the Eskom Theseus substation which is located 16.2 km North-East of the north-western corner of project site.

The ECO has the responsibility of ensuring the mitigation/ rehabilitation measures and conditions referred to in the Environmental Authorisation ("**EA**") are implemented, as well as ensuring compliance with the requirements of the Environmental Management Programme ("**EMPr**"). This report provides an insight into the overall compliance performance and a summary of other environmental concerns and potential environmental risks through observations during site inspections.

This report is based on the following environmental conditions or requirements:

- a) Environmental Authorisations (EA)
  - 1) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
  - 2) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)
- b) Environmental Management Programmes (EMPr)
- c) Relevant environmental legislation.
- d) All other environmental permits, licenses, and authorisations.

The notification of commencement of construction was submitted to the DFFE for Virginia Solar Plant (Pty) Ltd on the 02 May 2024.

This report addresses conditions set out in the EA which states the ECO as part of their duties: "*The ECO must keep record of all activities on site, problems identified, transgressions noted, and a task schedule of tasks undertaken by the ECO.*" As per the roles and responsibilities in the Virginia Solar Project ("**VSP**") EMPr, the

primary role of the ECO will be to monitor the construction activities and ensure that the mitigation measures of the EMPr and Environmental Authorisations (EA) are implemented. This report also includes an audit checklist for the VSP EA as follows:

- 1) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
- 2) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)

A summary of the various environmental requirements i.e. the audit criteria relating to the overall project is provided in **Table 1**.

**Table 1:** Summary of environmental requirements / criteria relating to the overall project.

| Components of overall project         | Environmental requirements / criteria |               |                                |              |
|---------------------------------------|---------------------------------------|---------------|--------------------------------|--------------|
|                                       | DFFE EA Ref No.                       | Issue date    | Approved EMPr<br>(Compiled by) | Date         |
| Virginia Solar Park Switching Station | 14/12/16/3/3/2/2099/2                 | 20 April 2022 | Terramanzi Group (Pty) Ltd     | October 2023 |
| Virginia Solar Park OHPL              | 14/12/16/3/3/1/2444                   | 02 Feb 2022   | Terramanzi Group (Pty) Ltd     | October 2023 |

This report represents the monitoring for the Construction Phase. The responsibility of enforcement of the conditions of the EAs and EMPrs lies with the Project and Project Manager, while the Department of Forestry, Fisheries, and the Environment (“DFFE”) Environmental Management Inspectorate (“EMI”) may also enforce existing and potentially new conditions through compliance notices.

An Environmental Site Compliance Officer (“ESCO”) has been appointed by the holder of the EA to monitor the project compliance onsite on a full-time basis on behalf of the EA holder. The responsibilities of the ESCO includes:

- Monitoring conditions of the Basic Assessment Reports (“BARs”), Environmental Impact Report (EIR) EAs and the EMPrs.
- Ensuring compliance with all relevant environmental legislation.
- Approving method statements (reviewed by the ECO and co-approved by Site Manager).
- Remaining employed until the completion of the construction activities.
- Reporting to the Project Manager, including all findings identified onsite.

- Reporting any significant findings to the ECO.
- Preparing and submitting monthly reports to the ECO and Project Manager.
- Monitoring compliance by the Contractor.

In addition, the ESCO will:

- Undertake daily inspections of the site and surrounding areas.
- Audit compliance with the EMPr and conditions of the environmental authorisation.
- Take appropriate action if the specifications contained in the EMPr and conditions of the environmental authorisation are not followed.
- Monitor and verify that environmental impacts are kept to a minimum, as far as possible; and
- Ensure that activities onsite comply with all relevant environmental legislation.

## **1.2 Audit Scope and Purpose.**

In accordance with Regulation 34 of the 2014 NEMA EIA Regulations (as amended) the holder of an environmental authorisation must, for the period during which the EA and EMPr, and where applicable the closure plan, remain valid —

- a) Ensure that the compliance with the conditions of the EA and the EMPr, and where applicable the closure plan, is audited; and*
- b) Submit an environmental audit report to the relevant competent authority.*

The purpose of this environmental audit is to verify compliance to the overarching environmental requirements specified as conditions of the EAs and EMPrs, and report on the extent to which the objectives of the EMPrs and are being achieved.

## **1.3 Monitoring Frequency and Reporting.**

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 25<sup>th</sup> of August 2025 after which this report was compiled which serves to document and audit. This report covers the monthly reporting for the month of August 2025.



## 2 AUDITOR BACKGROUND.

NCC is a multi-disciplinary environmental consulting company based in South Africa which adopts a 'values driven' approach with a common purpose to conserve and create sustainable environments that enable people, planet and business to thrive. We are a trusted partner to major engineering and construction firms, mines, parastatals, film, sports and event production companies, municipalities, provincial and national government, and conservation organisations. Drawing on our years of experience on a wide range of projects, NCC works with our clients to develop, implement, and monitor customised services that add real value.

The auditor, **Jennipher Sakaunda**, is a senior environmental manager with more than 14 years' experience currently employed with NCC. Jennipher Sakaunda has experience in several environmental fields including environmental compliance monitoring and auditing, due diligence assessment, environmental impact and risk assessment, and compilation of environmental management plans/programmes.

**Table 2:** Details of the auditor.

|                       |                                                                                                                                                                                                |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Company</b>        | NCC Operations (Pty) Ltd                                                                                                                                                                       |
| <b>Auditor</b>        | Jennipher Sakaunda                                                                                                                                                                             |
| <b>Tel</b>            | +27 21 702 2884                                                                                                                                                                                |
| <b>Mobile</b>         | +27 69 510 7630                                                                                                                                                                                |
| <b>Email</b>          | <a href="mailto:jenniphers@ncc-group.co.za">jenniphers@ncc-group.co.za</a>                                                                                                                     |
| <b>Address</b>        | 26 Bell Close, Westlake Business Park Westlake, 7945                                                                                                                                           |
| <b>Affiliation</b>    | International Association of Impact Assessment South Africa.<br>Environmental Assessment Practitioner Association of South Africa.<br>South African Council of Natural Scientific Professions. |
| <b>Qualifications</b> | BSc (honors) Environmental Management                                                                                                                                                          |
| <b>Expertise</b>      | A detailed CV can be provided on request.                                                                                                                                                      |

### 3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (August 2025) included the following:

- Excavation of monopole foundations.
- Cast blinding slab and steel fixing at the OHL.
- Filling and compaction of borrow material.
- Construction of the internal road connecting the access road to the Temporary Site Offices (TSF) and Switching Station.
- Fencing.
- Reworking of the rain damaged portions of the access road.
- Construction of the temporary stormwater berm.

#### 3.1 General Outstanding matters

Any major outstanding matters are to be recorded and summarised in the Concerns Register (**Annexure A**). The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

#### 3.2 Audits (Internal and External)

Internal audits are undertaken monthly by the Red Rocket ESCO. This ECO Audit was undertaken on the 25<sup>th</sup> of August 2025. Audit tables/checklists are attached to this report. The ECO undertakes external monthly audits.

## 4 WASTE MANAGEMENT

The contractor must make provision for waste avoidance, minimisation, and separation of waste where possible through recycling efforts. Waste management awareness must be done on an ongoing basis and must be provided through toolbox talks and awareness posters. A waste station was constructed at V3 where waste is temporarily stored, stored and recycled. The waste station includes a bund where waste will be stored and various compartments where waste will be sorted into. The contractor must ensure that the waste area has a roof to protect waste from weather elements. Recyclables are being stored until there are enough quantities to transport to Mpact for recycling. Large quantities of wood pallets were observed onsite which present a fire hazard. The contractor is liaising with the local groups to identify beneficiaries for the wood pallets. Communities must be notified the dangers of using the pallets as firewood as they can contain hazardous chemicals.

### 4.1 Domestic/ General Waste

Approximately **288 kg** of general waste was removed from site in the month of August 2025. Waste bins are placed along the OHL line where each team will be working, at the end of the day waste is collected and placed at the laydown areas for temporary storage. Designated waste areas have been provided at the contractors' main site offices/laydown areas for purposes of temporary storage of waste prior to collection and transferal to the licensed waste facilities. Bins at the laydown area are colour coded for each waste type. The contractor has commenced with taking waste for recycling.

The service providers dispose the general waste at Matjhabeng Local Municipality waste disposal site-Licence number: B33/2/340/21/P8 16/2/7/C404/D2/Z1/P367. Proof of disposal is available on request.

### 4.2 Hazardous waste

Hazardous waste skips are available at the dedicated waste storage area at each of the sub-contractors' site offices/lay down areas. Approximately **3180 kg** of hazardous waste was disposed of in August 2025. Hazardous waste in form of oil spillages, cement spillages and contaminated soil is kept onsite until there is enough to dispose. Although spillages have been recorded on site, they are fewer than in the previous months. To continue to reduce the number of spillages the ESCO together with the contractors Environmental Officer must re-train workers on spillages, ensure all vehicles are serviced and only road worthy are allowed onsite.

### 4.3 Wastewater

Approximately **42497 L** of sewerage waste was generated on site in the month of August 2025. Chemical toilets and a conservancy tank have been provided onsite. Fewer incidents' spillages from the chemical toilets have been recorded this month as compared to the previous months. The contractor must ensure these chemical toilets are serviced regularly and drip trays are placed under each toilet.

The General Authorisation that was issued by DWS for the includes the use of a conservancy tank up to a capacity of 50 000 L. The conservancy tank onsite has a capacity of 12 500 L which is below the stipulated GA threshold. The contractor must ensure that this capacity is not exceeded.

The Appointed Service Provider removes sewage and disposes of it at Matjhabeng Local Municipality wastewater treatment facility - Licence No: 10/D4/J/G/2082. Proof of disposal is available onsite. The contractor must ensure the appointed service provider is licenced to provide sewer removal services. With the work being spread out on the lines the contractor must ensure ablutions are within walking distance within the areas where people are working.

## 5 PROTECTIVE MEASURES

### 5.1 General

Protective measures have been deployed to mitigate environmental impacts or prevent impacts from occurring which includes:

- Security guards are present on the site, with access control in place.
- Induction training is conducted for all persons working and visiting the site.
- Snake gaiters are provided.
- Spill kits are available on site.
- No-go areas are demarcated and provided with signage.
- Access cards are used to enter and exit the site.
- Rapid alcohol detecting is in place.

## 6 ENVIRONMENTAL CONSERVATION

### 6.1 Conservation of Flora and Fauna

A permit to clear the site and relocate species of concern was received from the Free state Department of Economic, Small Business Development, Tourism and Environmental Affairs. The permit with Ref No. 202306000012649 was issued on 08/06/2023 to pluck protected and unprotected flora.

Clearance of alien vegetation has is in progress, however the pace at which the contractor is removing alien vegetation is concerning especially with the onset of rains is expected in September. More resources must be allocated towards alien vegetation removal. It is important that the contractor clears all the alien vegetation as some of the alien plants will soon be dispersing seed creating a seed bank. The contactor must monitor the cleared areas to ensure alien vegetation does not re-establish. The contractor must make an effort to remove the stockpiled alien vegetation to the Matjhabeng Local Municipality for disposal.

### 6.2 Water Management

Approximately **152 m<sup>3</sup>** of water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The GA allows for abstraction of 43 000m<sup>3</sup> annually, the contactor must ensure water abstraction does not exceed the licenced volumes. The contactor also abstracted **2086 m<sup>3</sup>** of water from another licenced source. Groundwater was encountered on some of pits; water must be pumped out before concrete is poured.

### 6.3 Soil Management

Cleared topsoil has been stockpiled along the OHL line and the switching station. These must be protected from erosion and alien vegetation establishment. In some areas where the contractor has finished pouring concrete and the pits have closed. The contactor must ensure subsoil is used for infilling. Topsoil must only be spread after the structures have erected to prevent compaction. Groundwater encountered during excavation must be pumped out before concrete is poured to prevent ground water contamination.

### 6.4 Stormwater and Erosion onsite

The contractor's Stormwater Management Plan was approved, measures to manage erosion as per the approved SWMP have been implemented to prevent erosion and water ponding. More drains have been opened to prevent water ponding, and berms have been placed on the access roads to prevent them from being eroded. Measures diverted clean stormwater away from the works towards the watercourses must be implemented.

## **7 INFRASTRUCTURE MANAGEMENT**

### **7.1 Access Roads**

The project team is using existing farm roads for current construction activities until such time as the project access roads and internal roads have been constructed. The contractor has graded the access roads to address the effects water ponding and erosion. Maintenance of the access roads must be done on a regular basis.

### **7.2 Fences, Gates, and Barricading**

The site is fenced with security personnel manning the gates. Access cards are used to allow entrance to site. Barricading was observed on site, and such should continue to be maintained around all open excavations along the OHPL servitudes to prevent potential fauna (wildlife and livestock) incidents. The contractor has put temporary fences which is more secure on some of the pits where work will continue at a later stage. Pits with ground water must be barricaded with temporary fences to prevent animals from falling into the pits. All excavation along the line must be barricaded and deep excavation signs and topsoil sign must be placed.

### **7.3 Buildings and Structures**

Containers have been established on site by various subcontractors that are being used as offices. Male and female ablution facilities have been provided. Chemical toilets and a conservancy tank are used to manage sewer onsite.

## **8 SOCIAL RESPONSIBILITY**

Any complaints from the public are to be recorded on complaints register maintained by the Contractor whose responsibility it is to track and resolve the complaints/issues that are raised. In addition, a box for receiving internal grievances is present at the main site office facility which allows for project staff to bring to the attention of the project management team any comments and or concerns.

## 9 ENVIRONMENTAL AWARENESS AND TRAINING

The contractor has undertaken Toolbox talks for the month of August 2025 covering the following topics:

- The Importance of Drip tray
- The importance of Housekeeping
- Incident and Accident Reporting
- Sewage Management Plan
- Pollution Prevention: Cement and Concrete Use
- Incident and Accident Reporting
- Environmental Management Programme (EMPr), Overview
- Snakes on site
- Housekeeping Procedure
- Pollution Prevention: Cement and Concrete Use.
- Snake Awareness

## 10 HERITAGE

In the event of any unknown artefacts being uncovered during construction, the ESCO and Project Manager must be informed immediately who must then instruct work to be stopped in the immediate area and then promptly report the discovery/finding to the ECO, a heritage specialist and the relevant heritage authority to investigate and confirm if such discovery is in fact a heritage artefact of any significance. No activities impacting upon any heritage sites were reported during this reporting period.

## 11 WARNING & NCRS

No NCR reports were issued by the ECO in the month of August.

## 12 REHABILITATION

No rehabilitation works have commenced during this period, further rehabilitation is expected to occur on the project as and when other works have been completed.

## 13 INCIDENTS AND ACCIDENTS

All environmental related events, incidents and accidents are to be reported directly to the ECO and kept on a central register and included in the monthly report. No environmental incidents that are reportable under Section 30 of the NEMA occurred in August 2025. A register of environmental incidents is attached as **Annexure C**.

## 14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 25<sup>th</sup> of August 2025 with observations documented in this report. Monthly ECO compliance reports are submitted to the Department (DFFE) by the ECO.



## 15 AUDIT METHODOLOGY

This section provides an overview of the methods employed in making observations and providing recommendations and conclusions derived from the audit procedures undertaken.

### 15.1 Audit Process

The site visit, data reviews and report drafting were undertaken by the ECO/auditor. The audit included the following procedures:

- **Site Inspections.** The areas and aspects covered during the inspections with concurrent discussions with the ESCO and site-based representatives of the EA holder included *inter alia*:
  - i. Access control to the sites.
  - ii. Ecologically sensitive areas, where applicable.
  - iii. Waste management.
  - iv. Incident and complaints management.
  - v. Landowner relations.
  - vi. Infrastructure management.
  - vii. Environmental Awareness.
  - viii. Record-keeping and document control.
  - ix. Stormwater and Erosion management
- **Documentation review.** This included:
  - i. A review of the EAs, EMPs and where applicable, method statements.
  - ii. A review of previous audit reports, records, observations, and findings.
  - iii. A review of any remedial and/or protective measures implemented.
  - iv. Identification, if applicable, any gaps requiring action and/or rectification.
- **Audit Report compilation.** This included:
  - i. Recording any observations and findings identified during the audit.
  - ii. Providing recommendations relating to improvement or non-compliance, if and where applicable.

## 15.2 Observation and Recommendation Determination

Observations and subsequent recommendations were based on and are limited to the following:

- i. Available documentation and records viewed or received prior, subsequent, or during the site visit.
- ii. Observations made during the period that the ECO/auditor was on site; and
- iii. Information received from both direct and cross-referenced discussions with permanent site-based staff.

## 15.3 Findings

Any key findings highlighted in this report will indicate areas and/or aspects that require improvement or rectification. The purpose of summarising the findings is to allow the EA holder to identify common management challenges that effect the level of compliance to the conditions of the EAs and EMPs.

Where findings and recommendations pertaining are deemed significant through compliance status or performance, they are documented as specific issues in the report. All site-specific observations are recorded in the corresponding audit checklist tables.

## 15.4 Audit Tables and Compliance Ratings

The audit table captures observations and recommendations made in relation to the conditions stipulated in the EAs and EMPs. It provides the reader with more detailed information in terms of what the stipulated requirements are in relation to the organisation's assessed current compliance status, according to the observations recorded by the auditor.

Ratings are calculated based on a scoring system whereby each auditable condition is provided with a score as highlighted in **Table 4** below.

**Table 4:** Compliance rating and scoring.

| Status                              | Compliance Rating |         | Description                                                                                                                                                                                |
|-------------------------------------|-------------------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | Abbreviation      | Scoring |                                                                                                                                                                                            |
| <i>Compliant</i>                    | C                 | 2       | <i>No improvements required</i>                                                                                                                                                            |
| <i>Partially Compliant</i>          | PC                | 1       | <i>Minor improvements required</i>                                                                                                                                                         |
| <i>Non-Compliant</i>                | NC                | 0       | <i>Major improvements required</i>                                                                                                                                                         |
| <i>Work in Progress</i>             | WiP               | -       | <i>Environmental management measures are underway but not yet fully implemented or verified, requiring further monitoring and assessment.</i>                                              |
| <i>Not Applicable / Not Audited</i> | NA                | -       | <i>No improvements required and / or the condition is either not, not yet or no longer relevant at the time of the audit</i>                                                               |
| <i>Informative</i>                  | info              | -       | <i>These relate to informative elements that provide either useful information or are descriptive in the explanation and understanding of statements or concepts in the audit criteria</i> |

Each condition has been ascribed a colour-coded status indicator of Compliant (green), Partially Compliant (orange), major-compliant (red), Not Auditable/Audited (grey), Work in Progress (light red) and Informative (blank/white) to assist the reader in determining aspects that require attention to improve on compliance achieved, if and where applicable. No compliance scoring is attributed any of the audit criteria information pertaining to the following three audit status symbols, namely 'NA', 'WiP', and 'info' as they were either not auditable and/or were not applicable/relevant at the time the audit was undertaken. In other words, they are excluded from the overall compliance rating calculations.

An overall compliance rating is calculated as a percentage to provide the reader with an overview of compliance to the relevant audit criteria however each condition should be considered on its own merits as the ratings do not necessarily portray the severity or impact of the reported finding relating to a condition.

## 16 ASSUMPTIONS AND LIMITATIONS

The ECO compliance audit and associated report are based upon the assumptions that:

- i. Documentation provided to the ECO/auditor is factual and true.
- ii. The audit is based purely on the conditions as stipulated in the EAs and EMPs.
- iii. The construction phase is currently underway and operational phase activities are not applicable.
- iv. Documentation / reports were randomly sampled / reviewed in order to accommodate time constraints.
- v. Where visual observations were not possible either due to physical access constraints or safety constraints, the ECO/auditor used other means to determine compliance, either through requesting written evidence provided by contractors / service providers who service the site or via interviews with technical site-based staff.

## 17 CONSULTATION PROCESS

The approach of consultation followed during the environmental audit was based on written (email) and telephonic correspondence between the ECO/auditor and the Environmental Site Compliance Officer which also includes consultation and communication with the EA holder and competent authority in terms of report submission.

## 18 FINDINGS

Findings are listed in the attached checklists, and it should be noted that findings should be considered individually in the context of the full audit and each condition and associated rating.

The following findings were noted onsite:

- Clearance of alien vegetation ongoing on the stockpiles.
- Some monopole pits are not located on the same position as on the Environmental Authorisation. These pits are however located as per the approved Final Layout.
- Groundwater has been encountered during monopole excavations.
- Some excavated pits were observed to have no deep excavation and topsoil signage.
- No barricading has been erected for the no-go areas by the wetland at tower 13.
- Dust was observed on the access roads,
- Large quantities of pallets found at the waste area.
- Cigarette buds found in the veld.

Based on the outcomes of the audit it was established that the objectives of the EAs and EMPs were achieved in terms of:

- i. *Sufficiently providing for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis.*
- ii. *Ensuring compliance with the provisions of environmental authorisation and EMPs.*

### 18.1 Minor improvements required.

- Smoking is only permitted at designated areas.

### 18.2 Major improvements required.

- Clearance of alien vegetation must be done on all affected areas.
- A barricading net must be placed to demarcate the no-go areas at the wetland area.
- Dust suppression must be undertaken more frequently.

## 19 AUDIT SUMMARY

In terms of the findings and results of the **August 2025** ECO audit, the project achieved an overall **99%** compliance rating with the conditions of the EAs and EMPs.

**Table 5: Compliance Scoring**

| No.                                       | Audit criteria                                                                                             | Compliant (C) | Partially Compliant (PC) | Major-non-Compliant (NC) | Work in Progress | Normative (info) | Not Applicable / Not Audited (NA) | Percentage Score      |
|-------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------|--------------------------|--------------------------|------------------|------------------|-----------------------------------|-----------------------|
| 1                                         | Environmental Authorisation for Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)                | 24            | 0                        | 0                        | 1                | 18               | 3                                 | 100%                  |
| 2                                         | Environmental Authorisation for Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2) | 26            | 0                        | 0                        | 1                | 19               | 3                                 | 100%                  |
| 3                                         | EMPr Virginia Solar Park OHPL (DFFE REF NO: 14/12/16/3/3/1/2444)                                           | 212           | 9                        | 0                        | 0                | 50               | 57                                | 98%                   |
| 4                                         | EMPr Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2)                            | 175           | 3                        | 0                        | 0                | 22               | 27                                | 99%                   |
| Overall total no. conditions              |                                                                                                            | 437           | 12                       | 0                        | 2                | 109              | 90                                |                       |
| Audited conditions                        |                                                                                                            | 874           | 12                       | 0                        | 0                | -                | -                                 | (Potential max score) |
| Overall Compliance Rating Calculation (%) |                                                                                                            | 99%           |                          |                          |                  |                  |                                   |                       |

## 20 RECOMMENDATIONS

**Based on the findings identified the following is recommended:**

- Barricade net the no-go areas at the wetland at tower number 13 must be erected.
- Smoking must only be done at designated areas; it is mostly important along the line where there is dry grass.
- The Department of Forest and Fisheries must be notified of the discrepancy on the location of the pits .
- Pits with ground water must be barricaded with temporary fence to prevent animals from drowning.
- Alien vegetation clearance must continue onsite, and the contractor must monitor the cleared areas to prevent reestablishment of alien vegetation.
- All excavation must be fitted with signs.
- All trenches must be barricaded at the end of each working day.
- When groundwater is encountered it must be pumped out before concrete is poured.
- Dust suppression must be done at a frequency determined by the weather conditions.

## 21 CONCLUSION

The contractor must ensure that systems and resources to monitor and manage environmental risks and impacts adequately are in place. Resources and personnel to train employees on the contents of the EMPs must be made to ensure that the project runs effectively and efficiently with minimal impact to the biophysical and socio-economic environment.

In general, the EMPs are effective in their current format in terms of content and relevance and there are no major shortcomings. The EMP's sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with this project.

**PREPARED BY:**

A handwritten signature in black ink, appearing to read 'Sakaunda'.

**Sakaunda Jennipher**

Environmental Control Officer

NCC Operations (Pty) Ltd

**M** ·069 510 7630

**E** · [jenniphers@ncc-group.co.za](mailto:jenniphers@ncc-group.co.za)

**REVIEWED BY:**

A handwritten signature in black ink, appearing to read 'Nick Gates'.

**Nick Gates**

Senior Environmental Consultant

NCC Operations (Pty) Ltd

**M** ·073 1998 431

**E** ·[nickg@ncc-group.co.za](mailto:nickg@ncc-group.co.za)



# ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

## Open Concerns/Complaint

| No | Observation date | Concern/Complaint | Suggested Due Date <sup>1</sup> | Proposed Corrective Action | Status | Closure status |
|----|------------------|-------------------|---------------------------------|----------------------------|--------|----------------|
|    |                  |                   |                                 |                            |        |                |

*\*The concerns register is updated once the ECO is present on site.*

## Closed Concerns

| No | Observation date | Concern/Complaint | Due Date suggested by ECO | Corrective Action Taken | Outcome | Closure status |
|----|------------------|-------------------|---------------------------|-------------------------|---------|----------------|
|    |                  |                   |                           |                         |         |                |
|    |                  |                   |                           |                         |         |                |

# ANNEXURE B - NCR REGISTER

| Ref No. | Originator | Dated Issued | Description | Proposed Corrective Action | Closure Status | Closure Date | Further Action Required |
|---------|------------|--------------|-------------|----------------------------|----------------|--------------|-------------------------|
|         |            |              |             |                            |                |              |                         |

## ANNEXURE C - INCIDENT REGISTER

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                       | Volume                                         | Remedial Action                                              |                                                                                 |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|--------------------------------------------------------------|---------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                                                 |                                                | Immediate<br>Corrective<br>Actions                           | Preventative<br>measures                                                        |
| 20/03/2025 | Waste water                                                                                     | Soil pollution                                                                               | On 20, 2025, at approximately 8:28, the conservancy tank being used to collect wastewater from conservancy tank had overfilled, and a Spillage had occurred spillage of approximately 8-10 litres of wastewater mixed with the cleaning material. the toilet supplier attended to the spill immediate & initiated spill Clean-up. Contaminated soil was taken to the hazardous waste skip.    | 10 l<br>(below<br>Section<br>30<br>threshold ) | Clean- up must be done as soon as the spills are identified. | The conservancy tank must be emptied more frequently to reduce overfilling.     |
| 19/03/2025 | Waste water                                                                                     | Soil pollution                                                                               | Approximately 12 litres of wastewater mixed with the cleaning chemicals where toilets are located. The toilet had been leaking since the previous day and wastewater was contained in a drip tray. The toilet supplier was notified, and he came to service<br><br>The toilets; however, during servicing; the drip tray spilled over causing the spillage of the wastewater onto the ground. | 12l<br>(below<br>Section<br>30<br>threshold )  | Clean- up must be done as soon as the spills are identified. | Leaking toilets must not be allowed onsite.                                     |
| 08/03/2025 | Diesel spillage                                                                                 | Soil pollution                                                                               | On 08 March 2025 at 05:30, security supervisor discovered a diesel leakage during the morning patrol. The spillage occurred due to the diesel injectors that were                                                                                                                                                                                                                             | 20l<br>(below<br>Section<br>30<br>threshold )  | Clean- up must be done as soon as the spills are identified  | Vehicles must be maintained regular . only road worthy vehicles must be onsite. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                 | Volume                                   | Remedial Action                                             |                                                                                |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                              |                                          | Immediate Corrective Actions                                | Preventative measures                                                          |
|            |                                                                                  |                                                                            | loose one of them was not properly fitted and diesel pressure removed them while the bakkie was in motion.                                                                                                                                                                                                                                                              |                                          |                                                             |                                                                                |
| 07/03/2025 | Water and antifreeze                                                             | Soil pollution                                                             | The Driver parked the minibus on site, shortly a leak observed containing a mixture of water and antifreeze, while also exhibiting signs of overheating.                                                                                                                                                                                                                | -                                        | Clean- up must be done as soon as the spills are identified | Vehicles must be maintained regular. only road worthy vehicles must be onsite. |
| 06/05/2025 | Water mixed with antifreeze spillage                                             | Soil pollution                                                             | On 6 May 2025 at 14:00, the TLB Operator was busy moving spoil material near the access road to the allocated spoil Stockpile area, when the TLB, radiator fan belt snapped & the container that stores water & antifreeze busted. Approximately 5 Liters of water with antifreeze spilled                                                                              | 5 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.                  |
| 08/05/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | A chemical toilet in PV3 at the laydown area at around 3:53 pm, 08 May 2025 was reported to be leaking, when the toilet was assessed, it was identified that there was a broken pipe that leaked the chemical water. An immediate action was taken to clean up the spillage. The contaminated soil was collected into the bags and taken to site waste management area. | 6 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent.         |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                   | Volume                                            | Remedial Action                                             |                                                                        |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                             |                                                   | Immediate<br>Corrective<br>Actions                          | Preventative<br>measures                                               |
| 12/05/2025 | Diesel spillage                                                                                 | Soil pollution                                                                               | On 12-05-2025 at 06:40, the ambulance was on the way to the access control point along the main access road, when it had a sudden breakdown and diesel was spilled along the access road, leaving a trail of diesel spill for approximately +400 Metres. Approximately +-2 Litres of diesel was spilled                                                                                                                                                   | 2 litres<br>(below<br>Section<br>30<br>threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.          |
| 15/05/2025 | Hydraulic oil spillage                                                                          | Soil pollution                                                                               | On the 15/05/2025, a side tipper truck was transporting spoil material when the cylinder failed and spilled ~7 litres of hydraulic oil, about 455m from the nearest watercourse. The contaminated soil was promptly cleaned up.                                                                                                                                                                                                                           | 7 litres<br>(below<br>Section<br>30<br>threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.          |
| 20/05/2025 | Toilet Cleaner mixed with water spillage                                                        | soil pollution                                                                               | It was around 11:30 am when it was reported that there was a spillage, that when the Fidamo team was about to clean the toilets at Pv1 Laydown area, a pipe from the generator busted and the water leaked from the broken pipe. The water that spilled was approximately 3-4 Liters and the pipe was immediately stopped. The chemical that was in the water is blue splash Toilet chemical. An immediate action was taken to clean up the spillage. The | 4 litres<br>(below<br>Section<br>30<br>threshold) | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                 | Volume                                                                 | Remedial Action                                                                                            |                                                                                                               |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                              |                                                                        | Immediate Corrective Actions                                                                               | Preventative measures                                                                                         |
|            |                                                                                  |                                                                            | contaminated soil was collected into the bags and taken to site waste management area.                                                                                                                                                                                                                                                                                                                                  |                                                                        |                                                                                                            |                                                                                                               |
| 21/05/2025 | Fauna                                                                            | Loss of biodiversity                                                       | On the 21/05/2025 a snake was fatally wounded during the internal road construction works.                                                                                                                                                                                                                                                                                                                              | N/A                                                                    | The dead animal was buried.                                                                                | N/A                                                                                                           |
| 26/05/2025 | Hydraulic oil spillage                                                           | Soil pollution                                                             | On 26/05/2025, at around 16:50 a drill rig operator noticed a leak from the machine, he immediately reported the leak to the supervisor. The supervisor called the mechanic but did not report the spillage. The oil further spilled to the soil during the repair attempts which were done under poor lighting. The spillage was left overnight and was only reported to the EO the next morning when the shift began. | 25 litres<br>(below Section 30 threshold)                              | Clean- up must be done as soon as the spills are identified.                                               | The ESCO issued NCR to the subcontractor for failing to report spillage immediately.                          |
| 11/06/2025 | Concrete and oil Spillage                                                        | Soil pollution                                                             | On the 11 <sup>th</sup> of June 2025 the concrete mixer truck overturned resulting in the spillage of an estimated 3m3 (3 cubic meters) of concrete and approximately 8litres of diesel. The contractor removed the spilled concrete and dumped it on the natural area adjacent to the road                                                                                                                             | 8 litres of diesel and 3m3 of concrete<br>(below Section 30 threshold) | Clean- up must be done as soon as possible and an investigation must be done on the cause of the accident. | The ESCO issued an NCR to the subcontractor for failing to report dumping concrete on the natural vegetation. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                             | Volume                                 | Remedial Action                                                                                     |                                                                                                  |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|-----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                          |                                        | Immediate Corrective Actions                                                                        | Preventative measures                                                                            |
| 16/06/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | At 08:32am, on the 16th of June 2025, The Client (Robin) reported that ABLON's Ablution facilities were leaking which resulted to soil contamination, we immediately stopped everyone from using the Toilet and reported the issue to our service provider. A drip tray was placed immediately underneath the toilet. The event occurred at the OHL Site Camp and the name of the chemical that spilled on the ground is Portabloo Toilet Chemical. | 30 litres (below Section 30 threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 24/06/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | At around 8 am on the 24/06/2025 a spillage was reported by the contractor. Approximately 30 litres of Toilet Blue was spilled at the Virginia 1 laydown area. The spillage was cleaned up and the contaminated soil removed for disposal.                                                                                                                                                                                                          | 30 litres (below Section 30 threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 08/07/2025 | Hydraulic Oil Spillage                                                           | Soil pollution                                                             | A tipper truck spilled some hydraulic oil when the driver was offloading some excavated material at PV2 I8 road on the 08h of July 2025. The driver lifted the truck to off load the material when it was half way up, he discovered that the body of the truck was swinging to the sides and he tried to stop, and discovered some oil                                                                                                             | 30 litres (below Section 30 threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | Vehicles that are constantly breaking down must be moved off site.                               |

| Date | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                        | Volume | Remedial Action                    |                          |
|------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|------------------------------------|--------------------------|
|      | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                  |        | Immediate<br>Corrective<br>Actions | Preventative<br>measures |
|      |                                                                                                 |                                                                                              | leaks from the hydraulic cylinder, about +-9 litres of oil spilled to the ground and it was reported to the EO, immediately the supervisor and the driver cleaned the spillage and the contaminated soil was collected into bags and taken to ABC Solar Waste management area. |        |                                    |                          |

## **ANNEXURE D – PHOTOGRAPHS**





**Figure 1:** Groundwater encounter on some of the pits.



**Figure 2:** Wetland that has been transversed by trucks .





**Figure 3:** Cigarettes buds on the ground.



**Figure 4:** Alien vegetation on the topsoil stockpiles



**Figure 5:** Dust observed on the access roads.



**Figure 6:** Large quantities of wood pallets





**Figure 7:** Stored barricade material to be used at the trenches.



**Figure 8:** Waste bund construction in place

**THIS PAGE WAS INTENTIONALLY LEFT BLANK**



---

# ECO MONTHLY ENVIRONMENTAL MONITORING REPORT

Virginia Photo Voltaic (PV) Solar Facility 1, 2 and 3,  
Matjhabeng, Lejweleputswa District Municipality within  
the jurisdiction of the Free State Province.

---

**PREPARED FOR:**

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

Department of Forestry, Fisheries, and the Environment: Compliance Monitoring

**DATED:**

August 2025

**PREPARED BY:**

NCC Operations

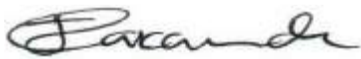
**T** • 021 702 2884

**E** • [info@ncc-group.co.za](mailto:info@ncc-group.co.za)

## DECLARATION OF INDEPENDENCE

I, Jennipher Sakaunda, as duly authorised representative of NCC Operations (Pty) Ltd ("**NCC**"), hereby confirm my independence (as well as that of NCC) as an auditor and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which URSA Energy (Pty) Ltd has appointed NCC as Environmental Control Officer ("**ECO**"), other than fair remuneration for work performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'J Sakaunda', is positioned below the 'Signed:' text.

**Jennipher Sakaunda**

03 September 2025

Environmental Control Officer

NCC Operations (Pty) Ltd

## **LIABILITY DISCLAIMER AND CONFIDENTIALITY CLAUSE**

All inspections conducted, as well as reports and recommendations provided by NCC are purely advisory. They are primarily intended for the purpose of assisting clients in loss control, risk management as well as health, safety, and environmental procedures.

Observations and recommendations are the result of practices and conditions observed, and information made available to us in various forms at the time of our visit. They do not purport to refer to or guarantee compliance with local or government regulations which may be applicable to such practices and conditions. This report should not be considered a definitive listing of all existing risks nor an absolute solution to all indicated risks, or hazards present from time to time in the Client Organisation. The report should always be considered in its entirety; individual sentences, paragraphs or sections of the report should not be used in isolation.

This report should not be reproduced except in its entirety, including this liability disclaimer or contents reproduced or disclosed to any third party without the prior written approval of NCC.

NCC assumes no responsibility for any losses incurred as a result of the implementation, management, and operation of recommended health, safety and environmental systems, processes and procedures.



## DOCUMENT CONTROL

|                     |                                             |
|---------------------|---------------------------------------------|
| <b>REPORT TITLE</b> | Monthly ECO Environmental Monitoring Report |
| <b>PROJECT</b>      | Virginia Solar PV 1, 2, 3                   |
| <b>LOCATION</b>     | Free State Province                         |
| <b>EA HOLDER</b>    | URSA Energy (Pty) Ltd                       |
| <b>ECO</b>          | NCC Operations (Pty) Ltd                    |
| <b>REVISION</b>     | 00                                          |
| <b>DATE</b>         | 03/09/2025                                  |

| Revision | Date       | Description                  |
|----------|------------|------------------------------|
| Rev 00   | 03/09/2025 | First Draft - Internal       |
| Rev 01   | TBC        | Final - Authority submission |

## REPORT DISTRIBUTION LIST

| Name                   | Organisation                      | Issued     | Format     |
|------------------------|-----------------------------------|------------|------------|
| Janine Brasington      | Red Rocket South Africa (Pty) Ltd | 03/09/2025 | Electronic |
| Serina Pillay          | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Maggie Logan           | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Director of Compliance | DFFE                              | TBC        | Electronic |

## TABLE OF CONTENTS

|                                                     |           |
|-----------------------------------------------------|-----------|
| <b>TABLE OF FIGURES.....</b>                        | <b>7</b>  |
| <b>ABBREVIATIONS.....</b>                           | <b>8</b>  |
| <b>1 INTRODUCTION.....</b>                          | <b>9</b>  |
| 1.1 Background .....                                | 9         |
| 1.2 Audit Scope and Purpose. ....                   | 11        |
| 1.3 Monitoring Frequency and Reporting. ....        | 11        |
| <b>2 AUDITOR BACKGROUND. ....</b>                   | <b>12</b> |
| <b>3 GENERAL (NOTABLE EVENTS) .....</b>             | <b>13</b> |
| 3.1 General Outstanding matters.....                | 13        |
| 3.2 Audits (Internal and External).....             | 13        |
| <b>4 WASTE MANAGEMENT .....</b>                     | <b>14</b> |
| 4.1 Domestic/ General Waste .....                   | 14        |
| 4.2 Hazardous waste .....                           | 14        |
| 4.3 Wastewater.....                                 | 15        |
| <b>5 PROTECTIVE MEASURES .....</b>                  | <b>15</b> |
| 5.1 General .....                                   | 15        |
| <b>6 ENVIRONMENTAL CONSERVATION.....</b>            | <b>16</b> |
| 6.1 Conservation of Flora and Fauna .....           | 16        |
| 6.2 Water Management .....                          | 16        |
| 6.3 Soil Management.....                            | 16        |
| 6.4 Stormwater and Erosion onsite .....             | 16        |
| <b>7 INFRASTRUCTURE MANAGEMENT.....</b>             | <b>17</b> |
| 7.1 Access Roads.....                               | 17        |
| 7.2 Fences, Gates, and Barricading .....            | 17        |
| 7.3 Buildings and Structures .....                  | 17        |
| <b>8 SOCIAL RESPONSIBILITY .....</b>                | <b>17</b> |
| <b>9 ENVIRONMENTAL AWARENESS AND TRAINING .....</b> | <b>18</b> |
| <b>10 HERITAGE .....</b>                            | <b>18</b> |
| <b>11 WARNING &amp; NCRS .....</b>                  | <b>18</b> |

|           |                                                       |           |
|-----------|-------------------------------------------------------|-----------|
| <b>12</b> | <b>REHABILITATION .....</b>                           | <b>19</b> |
| <b>13</b> | <b>INCIDENTS AND ACCIDENTS .....</b>                  | <b>19</b> |
| <b>14</b> | <b>MEETINGS AND OTHER CORRESPONDANCE.....</b>         | <b>19</b> |
| <b>15</b> | <b>AUDIT METHODOLOGY .....</b>                        | <b>20</b> |
| 15.1      | Audit Process .....                                   | 20        |
| 15.2      | Observation and Recommendation Determination .....    | 21        |
| 15.3      | Findings.....                                         | 21        |
| 15.4      | Audit Tables and Compliance Ratings.....              | 21        |
| <b>16</b> | <b>ASSUMPTIONS AND LIMITATIONS .....</b>              | <b>23</b> |
| <b>17</b> | <b>CONSULTATION PROCESS.....</b>                      | <b>23</b> |
| <b>18</b> | <b>FINDINGS.....</b>                                  | <b>24</b> |
| 18.1      | Minor improvements required.....                      | 25        |
| 18.2      | Major improvements required.....                      | 25        |
| <b>19</b> | <b>AUDIT SUMMARY .....</b>                            | <b>26</b> |
| <b>20</b> | <b>RECOMMENDATIONS.....</b>                           | <b>27</b> |
| <b>21</b> | <b>CONCLUSION .....</b>                               | <b>27</b> |
|           | <b>ANNEXURE A – CONCERNS/COMPLAINTS REGISTER.....</b> | <b>29</b> |
|           | <b>ANNEXURE B - NCR REGISTER .....</b>                | <b>29</b> |
|           | <b>ANNEXURE C - INCIDENT REGISTER.....</b>            | <b>30</b> |
|           | <b>ANNEXURE D – PHOTOGRAPHS .....</b>                 | <b>35</b> |

## TABLE OF FIGURES

|                                                                         |    |
|-------------------------------------------------------------------------|----|
| Figure 1: Compaction of topsoil.....                                    | 36 |
| Figure 2: Nuisance due to water from the bowser .....                   | 36 |
| <b>Figure 3:</b> Cleared alien vegetation must be removed disposal..... | 37 |
| Figure 4: Alien vegetation. ....                                        | 37 |
| Figure 5: Large pile wood pallets. ....                                 | 38 |
| Figure 6: Bunded waste area.....                                        | 38 |

## ABBREVIATIONS

|             |                                                         |
|-------------|---------------------------------------------------------|
| <b>BAR</b>  | Basic Assessment Report                                 |
| <b>CA</b>   | Competent Authority                                     |
| <b>DEA</b>  | Department of Environmental Affairs (now DFFE)          |
| <b>DFFE</b> | Department of Forestry, Fisheries, and the Environment  |
| <b>DWS</b>  | Department of Water and Sanitation                      |
| <b>EA</b>   | Environmental Authorisation                             |
| <b>EAP</b>  | Environmental Assessment Practitioner                   |
| <b>ECO</b>  | Environmental Control Officer                           |
| <b>EIA</b>  | Environmental Impact Assessment                         |
| <b>EMPr</b> | Environmental Management Programme                      |
| <b>EO</b>   | Environmental Officer (Contractor)                      |
| <b>ER</b>   | Employer's Representative                               |
| <b>ESCO</b> | Environmental Site Compliance Officer                   |
| <b>kV</b>   | Kilovolt                                                |
| <b>MVA</b>  | Megavolt Amperes                                        |
| <b>MW</b>   | Megawatt                                                |
| <b>NCC</b>  | NCC Operations                                          |
| <b>NCR</b>  | Non-Compliance Report                                   |
| <b>NEMA</b> | National Environmental Management Act (No. 107 of 1998) |
| <b>NWA</b>  | National Water Act (No. 36 of 1998)                     |
| <b>OHPL</b> | Overhead Power Line                                     |
| <b>SDC</b>  | Safe Disposal Certificate                               |
| <b>SHE</b>  | Safety, Health, and Environment                         |
| <b>SS</b>   | Substation                                              |
| <b>TBC</b>  | To Be Confirmed                                         |

# 1 INTRODUCTION

## 1.1 Background

NCC Operations (Pty) Ltd ("**NCC**") was appointed by URSA Energy (Pty) LTD ("**URSA**") to provide a suitably experienced independent Environmental Control Officer ("**ECO**") for the construction phase of Virginia Solar Park which will be connected to the Eskom Theseus Main Transmission Substation (MTS). The site is located on Farm Blomskraal 216, Ventersburg RD located within the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province. On completion the facility will consist of the Photovoltaic (PV) Power Plant with a maximum generation capacity up to 100 MW, a 132kV powerline connecting the substation to the Eskom Theseus substation which is located 16.2 km North-East of the north-western corner of project site.

The ECO has the responsibility of ensuring the mitigation/ rehabilitation measures and conditions referred to in the Environmental Authorisation ("**EA**") are implemented, as well as ensuring compliance with the requirements of the Environmental Management Programme ("**EMPr**"). This report provides an insight into the overall compliance performance and a summary of other environmental concerns and potential environmental risks through observations during site inspections.

This report is based on the following environmental conditions or requirements:

- a) Environmental Authorisations (EA)
  - 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
  - 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
  - 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)
- b) Environmental Management Programmes (EMPr)
- c) Relevant environmental legislation.
- d) All other environmental permits, licenses, and authorisations.

The notification of commencement of construction was submitted to the DFFE for Virginia Solar Plant (Pty) Ltd on the 02 May 2024.

This report addresses conditions set out in the EA which states the ECO as part of their duties: *"The ECO must keep record of all activities on site, problems identified, transgressions noted, and a task schedule of tasks undertaken by the ECO."* As per the roles and responsibilities in the Virginia Solar Project ("**VSP**") EMPr, the primary role of the ECO will be to monitor the construction activities and ensure that the mitigation measures

of the EMPr and Environmental Authorisations (EA) are implemented. This report also includes an audit checklist for the VSP EA as follows:

- 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
- 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
- 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)

A summary of the various environmental requirements i.e. the audit criteria relating to the overall project is provided in **Table 1**.

**Table 1:** Summary of environmental requirements / criteria relating to the overall project.

| Components of overall project | Environmental requirements / criteria |               |                             |              |
|-------------------------------|---------------------------------------|---------------|-----------------------------|--------------|
|                               | DFFE EA Ref No.                       | Issue date    | Approved EMPr (Compiled by) | Date         |
| Virginia 1 Solar Park         | 14/12/16/3/3/2/2099/1                 | 20 April 2022 | Terramanzi Group (Pty) Ltd  | October 2023 |
| Virginia 2 Solar Park         | 14/12/16/3/3/2/2100                   | 20 May 2022   | Terramanzi Group (Pty) Ltd  | October 2023 |
| Virginia 3 Solar Park         | 14/12/16/3/3/2/2101                   | 20 April 2022 | Terramanzi Group (Pty) Ltd  | October 2023 |

This report represents the monitoring for the Construction Phase. The responsibility of enforcement of the conditions of the EAs and EMPrs lies with the Project and Project Manager, while the Department of Forestry, Fisheries, and the Environment (“DFFE”) Environmental Management Inspectorate (“EMI”) may also enforce existing and potentially new conditions through compliance notices.

An Environmental Site Compliance Officer (“ESCO”) has been appointed by the holder of the EA to monitor the project compliance onsite on a full-time basis on behalf of the EA holder. The responsibilities of the ESCO includes:

- Monitoring conditions of the Basic Assessment Reports (“BARs”), Environmental Impact Report (EIR) EAs and the EMPrs.
- Ensuring compliance with all relevant environmental legislation.
- Approving method statements (reviewed by the ECO and co-approved by Site Manager).
- Remaining employed until the completion of the construction activities.

- Reporting to the Project Manager, including all findings identified onsite.
- Reporting any significant findings to the ECO.
- Preparing and submitting monthly reports to the ECO and Project Manager.
- Monitoring compliance by the Contractor.

In addition, the ESCO will:

- Undertake daily inspections of the site and surrounding areas.
- Audit compliance with the EMPr and conditions of the environmental authorisation.
- Take appropriate action if the specifications contained in the EMPr and conditions of the environmental authorisation are not followed.
- Monitor and verify that environmental impacts are kept to a minimum, as far as possible; and
- Ensure that activities onsite comply with all relevant environmental legislation.

## **1.2 Audit Scope and Purpose.**

In accordance with Regulation 34 of the 2014 NEMA EIA Regulations (as amended) the holder of an environmental authorisation must, for the period during which the EA and EMPr, and where applicable the closure plan, remain valid —

- a) Ensure that the compliance with the conditions of the EA and the EMPr, and where applicable the closure plan, is audited; and*
- b) Submit an environmental audit report to the relevant competent authority.*

The purpose of this environmental audit is to verify compliance to the overarching environmental requirements specified as conditions of the EAs and EMPrs, and report on the extent to which the objectives of the EMPrs and are being achieved.

## **1.3 Monitoring Frequency and Reporting.**

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 25<sup>th</sup> of August 2025 after which this report was compiled which serves to document and audit. This report covers the monthly reporting for the month of August 2025.



## 2 AUDITOR BACKGROUND.

NCC is a multi-disciplinary environmental consulting company based in South Africa which adopts a 'values driven' approach with a common purpose to conserve and create sustainable environments that enable people, planet and business to thrive. We are a trusted partner to major engineering and construction firms, mines, parastatals, film, sports and event production companies, municipalities, provincial and national government, and conservation organisations. Drawing on our years of experience on a wide range of projects, NCC works with our clients to develop, implement, and monitor customised services that add real value.

The auditor, **Jennipher Sakaunda**, is a senior environmental manager with more than 14 years' experience currently employed with NCC. Jennipher Sakaunda has experience in several environmental fields including environmental compliance monitoring and auditing, due diligence assessment, environmental impact and risk assessment, and compilation of environmental management plans/programmes.

**Table 2:** Details of the auditor.

|                       |                                                                                                                                                                                                |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Company</b>        | NCC Operations (Pty) Ltd                                                                                                                                                                       |
| <b>Auditor</b>        | Jennipher Sakaunda                                                                                                                                                                             |
| <b>Tel</b>            | +27 21 702 2884                                                                                                                                                                                |
| <b>Mobile</b>         | +27 69 510 7630                                                                                                                                                                                |
| <b>Email</b>          | <a href="mailto:jenniphers@ncc-group.co.za">jenniphers@ncc-group.co.za</a>                                                                                                                     |
| <b>Address</b>        | 26 Bell Close, Westlake Business Park Westlake, 7945                                                                                                                                           |
| <b>Affiliation</b>    | International Association of Impact Assessment South Africa.<br>Environmental Assessment Practitioner Association of South Africa.<br>South African Council of Natural Scientific Professions. |
| <b>Qualifications</b> | BSc (honors) Environmental Management                                                                                                                                                          |
| <b>Expertise</b>      | A detailed CV can be provided on request.                                                                                                                                                      |

### 3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (**August 2025**) included the following:

- Construction of the internal road connecting the access road to the Temporary Site Offices (**TSF**) and Switching Station.
- Demobilisation of site offices and laydown area.
- Fencing.
- Clearing and grubbing of PV area and levelling works.
- Drilling and pile installations.
- Reworking of the rain damaged portions of the access road.
- Installing Solar Panels
- Installation of torque tubes.
- Trench excavation works for cables.

#### 3.1 General Outstanding matters

Any major outstanding matters are to be recorded and summarised in the Concerns Register (**Annexure A**). The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

#### 3.2 Audits (Internal and External)

Internal audits are undertaken monthly by the Red Rocket ESCO. This ECO Audit was undertaken on the 25<sup>th</sup> of August 2025. Audit tables/checklists are attached to this report. The ECO undertakes external monthly audits.

## 4 WASTE MANAGEMENT

The contractor must make provision for waste avoidance, minimisation, and separation of waste where possible through recycling efforts. Waste management awareness must be done on an ongoing basis and must be provided through toolbox talks and awareness posters. A waste station was constructed at V3 where waste is temporarily stored, stored and recycled. The waste station includes a bund where waste will be stored and various compartments where waste will be sorted into. The contractor must ensure that the waste area has a roof to protect waste from weather elements. Recyclables are being stored until there are enough quantities to transport to Mpact for recycling. Large quantities of wood pallets were observed onsite which present a fire hazard. The contractor is liaising with the local groups to identify beneficiaries for the wood pallets. Communities must be notified the dangers of using the pallets as firewood as they can contain hazardous chemicals.

### 4.1 Domestic/ General Waste

Approximately **288 kg** of general waste was removed from site in the month of August 2025. Designated waste areas have been provided at the contractors' main site offices/laydown areas for purposes of temporary storage of waste prior to collection and transferal to the licensed waste facilities. Bins at the laydown area are colour coded for each waste type. The contractor has commenced with taking waste for recycling.

The service providers dispose the general waste at Matjhabeng Local Municipality waste disposal site-Licence number: B33/2/340/21/P8 16/2/7/C404/D2/Z1/P367. Proof of disposal is available on request.

### 4.2 Hazardous waste

Hazardous waste skips are available at the dedicated waste storage area at each of the sub-contractors' site offices/lay down areas. Approximately **3180 kg** of hazardous waste was disposed of in August 2025. Hazardous waste in form of oil spillages, cement spillages and contaminated soil is kept onsite until there is enough to dispose. Although spillages have been recorded on site, they are fewer than in the previous months. To continue to reduce the number of spillages the ESCO together with the contractors Environmental Officer must re-train workers on spillages, ensure all vehicles are serviced and only road worthy are allowed onsite.

### 4.3 Wastewater

Approximately **42 497 L** of sewerage waste was generated on site in the month of August 2025. Chemical toilets and a conservancy tank have been provided onsite. Fewer incidents' spillages from the chemical toilets have been recorded this month as compared to the previous months. The contractor must ensure these chemical toilets are serviced regularly and drip trays are placed under each toilet.

The General Authorisation that was issued by DWS for the includes the use of a conservancy tank up to a capacity of 50 000 L. The conservancy tank onsite has a capacity of 12 500 L which is below the stipulated GA threshold. The contractor must ensure that this capacity is not exceeded.

The Appointed Service Provider removes sewage and disposes of it at Matjhabeng Local Municipality wastewater treatment facility - Licence No: 10/D4/J/G/2082. Proof of disposal is available onsite. The contractor must ensure the appointed service provider is licenced to provide sewer removal services. With the work being spread out the contractor must ensure ablutions are within walking distance within the areas where people are working.

## 5 PROTECTIVE MEASURES

### 5.1 General

Protective measures have been deployed to mitigate environmental impacts or prevent impacts from occurring which includes:

- Security guards are present on the site, with access control in place.
- Induction training is conducted for all persons working and visiting the site.
- Snake gaiters are provided.
- Spill kits are available on site.
- No-go areas are demarcated and provided with signage.
- Access cards are used to enter and exit the site.
- Rapid alcohol detecting is in place.

## 6 ENVIRONMENTAL CONSERVATION

### 6.1 Conservation of Flora and Fauna

A permit to clear the site and relocate species of concern was received from the Free state Department of Economic, Small Business Development, Tourism and Environmental Affairs. The permit with Ref No. 202306000012649 was issued on 08/06/2023 to pluck protected and unprotected flora.

Clearance of alien vegetation is in progress, however the pace at which the contractor is removing alien vegetation is concerning especially with the onset of rains is expected in September. The contractor must monitor the cleared areas to ensure alien vegetation does not re-establish. It is important that the contractor clears all the alien vegetation as some of the alien species will soon be dispersing seed creating a seed bank. This will make complete eradication of these plants difficult in the long term. The contractor must make an effort to remove the stockpiled alien vegetation to the Matjhabeng Local Municipality for disposal

Indigenous vegetation reestablishment was noted at solar fields; the flora composition must be recorded and compared with the surrounding areas to establish the rehabilitation measures required.

### 6.2 Water Management

Approximately **152 m<sup>3</sup>** of water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The GA allows for abstraction of 43 000m<sup>3</sup> annually, the contractor must ensure water abstraction does not exceed the licenced volumes. The contractor also abstracted **2086 m<sup>3</sup>** of water from another licenced source. Groundwater was encountered on some of pits; water must be pumped out before concrete is poured.

### 6.3 Soil Management

Cleared topsoil must be protected from erosion and alien vegetation establishment. Alien vegetation has established on the stockpiles and must be cleared. The contractor has commenced with moving the excess topsoil to an area near the main gate. Care must be taken that topsoil is not compacted in the process and to ensure stockpiles are not placed within the stormwater channels and the roads.

### 6.4 Stormwater and Erosion onsite

The contractor's Stormwater Management Plan was approved, measures to manage erosion as per the approved SWMP have been implemented to prevent erosion and water ponding.

## **7 INFRASTRUCTURE MANAGEMENT**

### **7.1 Access Roads**

The project team is using existing farm roads for current construction activities until such time as the project access roads and internal roads have been constructed. The contractor has graded the access roads to address the effects water ponding and erosion. Maintenance of the access roads must be done on a regular basis.

### **7.2 Fences, Gates, and Barricading**

The site is fenced with security personnel manning the access gates. Access cards are used to allow entrance to site. Barricading was observed on site, and such should continue to be maintained around all open excavations to prevent potential fauna (wildlife and livestock) incidents. The contractor must ensure trenches for cables on are barricaded at the end of each working day. The contractor is advised to work on small sections at a time to ensure that there is enough material to barricade the open trenches

### **7.3 Buildings and Structures**

Containers have been established on site by various subcontractors that are being used as offices. Male and female ablution facilities have been provided. Chemical toilets and a conservancy tank are used to manage sewer onsite. The contractor must ensure the bund meets the requirements such as ventilation and capacity as outlined in the EMPr. A waste station has established at V3. The waste station constitutes a bunded areas for the storage of hazardous waste and varies compartments where waste will be segregated into.

## **8 SOCIAL RESPONSIBILITY**

Any complaints from the public are to be recorded on complaints register maintained by the Contractor whose responsibility it is to track and resolve the complaints/issues that are raised. In addition, a box for receiving internal grievances is present at the main site office facility which allows for project staff to bring to the attention of the project management team any comments and or concerns.

## 9 ENVIRONMENTAL AWARENESS AND TRAINING

The contractor has undertaken Toolbox talks for the month of August 2025 covering the following topics:

- The Importance of Drip tray
- The importance of Housekeeping
- Incident and Accident Reporting
- Sewage Management Plan
- Pollution Prevention: Cement and Concrete Use
- Incident and Accident Reporting
- Environmental Management Programme (EMPr), Overview
- Snakes on site
- Housekeeping Procedure
- Pollution Prevention: Cement and Concrete Use.
- Snake Awareness

## 10 HERITAGE

In the event of any unknown artefacts being uncovered during construction, the ESCO and Project Manager must be informed immediately who must then instruct work to be stopped in the immediate area and then promptly report the discovery/finding to the ECO, a heritage specialist and the relevant heritage authority to investigate and confirm if such discovery is in fact a heritage artefact of any significance. No activities impacting upon any heritage sites were reported during this reporting period.

A barricade net was placed around the graves near the main gate to ensure the site is not disturbed by trucks moving excess topsoil.

## 11 WARNING & NCRS

No NCR reports were issued by the ECO in the month of August 2025.

## 12 REHABILITATION

No rehabilitation works have commenced during this period, further rehabilitation is expected to occur on the project as and when other works have been completed.

## 13 INCIDENTS AND ACCIDENTS

All environmental related events, incidents and accidents are to be reported directly to the ECO and kept on a central register and included in the monthly report. No environmental incidents that are reportable under Section 30 of the NEMA occurred in August 2025. A register of environmental incidents is attached as **Annexure C**.

## 14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 25<sup>th</sup> of August 2025 with observations documented in this report. Monthly ECO compliance reports are submitted to the Department (**DFFE**) by the ECO.



## 15 AUDIT METHODOLOGY

This section provides an overview of the methods employed in making observations and providing recommendations and conclusions derived from the audit procedures undertaken.

### 15.1 Audit Process

The site visit, data reviews and report drafting were undertaken by the ECO/auditor. The audit included the following procedures:

- **Site Inspections.** The areas and aspects covered during the inspections with concurrent discussions with the ESCO and site-based representatives of the EA holder included *inter alia*:
  - i. Access control to the sites.
  - ii. Ecologically sensitive areas, where applicable.
  - iii. Waste management.
  - iv. Incident and complaints management.
  - v. Landowner relations.
  - vi. Infrastructure management.
  - vii. Environmental Awareness.
  - viii. Record-keeping and document control.
  - ix. Stormwater and Erosion management
- **Documentation review.** This included:
  - i. A review of the EAs, EMPs and where applicable, method statements.
  - ii. A review of previous audit reports, records, observations, and findings.
  - iii. A review of any remedial and/or protective measures implemented.
  - iv. Identification, if applicable, any gaps requiring action and/or rectification.
- **Audit Report compilation.** This included:
  - i. Recording any observations and findings identified during the audit.
  - ii. Providing recommendations relating to improvement or non-compliance, if and where applicable.

## 15.2 Observation and Recommendation Determination

Observations and subsequent recommendations were based on and are limited to the following:

- i. Available documentation and records viewed or received prior, subsequent, or during the site visit.
- ii. Observations made during the period that the ECO/auditor was on site; and
- iii. Information received from both direct and cross-referenced discussions with permanent site-based staff.

## 15.3 Findings

Any key findings highlighted in this report will indicate areas and/or aspects that require improvement or rectification. The purpose of summarising the findings is to allow the EA holder to identify common management challenges that effect the level of compliance to the conditions of the EAs and EMPrs.

Where findings and recommendations pertaining are deemed significant through compliance status or performance, they are documented as specific issues in the report. All site-specific observations are recorded in the corresponding audit checklist tables.

## 15.4 Audit Tables and Compliance Ratings

The audit table captures observations and recommendations made in relation to the conditions stipulated in the EAs and EMPrs. It provides the reader with more detailed information in terms of what the stipulated requirements are in relation to the organisation's assessed current compliance status, according to the observations recorded by the auditor.

Ratings are calculated based on a scoring system whereby each auditable condition is provided with a score as highlighted in **Table 3** below.

**Table 4:** Compliance rating and scoring.

| Status                              | Compliance Rating |         | Description                                                                                                                                                                                |
|-------------------------------------|-------------------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | Abbreviation      | Scoring |                                                                                                                                                                                            |
| <i>Compliant</i>                    | C                 | 2       | <i>No improvements required</i>                                                                                                                                                            |
| <i>Partially Compliant</i>          | PC                | 1       | <i>Minor improvements required</i>                                                                                                                                                         |
| <i>Non-Compliant</i>                | NC                | 0       | <i>Major improvements required</i>                                                                                                                                                         |
| <i>Work in Progress</i>             | WiP               | -       | <i>Environmental management measures are underway but not yet fully implemented or verified, requiring further monitoring and assessment.</i>                                              |
| <i>Not Applicable / Not Audited</i> | NA                | -       | <i>No improvements required and / or the condition is either not, not yet or no longer relevant at the time of the audit</i>                                                               |
| <i>Informative</i>                  | info              | -       | <i>These relate to informative elements that provide either useful information or are descriptive in the explanation and understanding of statements or concepts in the audit criteria</i> |

Each condition has been ascribed a colour-coded status indicator of Compliant (green), Partially Compliant (orange), major-compliant (red), Not Auditable/Audited (grey), Work in Progress (light red) and Informative (blank/white) to assist the reader in determining aspects that require attention to improve on compliance achieved, if and where applicable. No compliance scoring is attributed any of the audit criteria information pertaining to the following three audit status symbols, namely 'NA', 'WiP', and 'info' as they were either not auditable and/or were not applicable/relevant at the time the audit was undertaken. In other words, they are excluded from the overall compliance rating calculations.

An overall compliance rating is calculated as a percentage to provide the reader with an overview of compliance to the relevant audit criteria however each condition should be considered on its own merits as the ratings do not necessarily portray the severity or impact of the reported finding relating to a condition.

## 16 ASSUMPTIONS AND LIMITATIONS

The ECO compliance audit and associated report are based upon the assumptions that:

- i. Documentation provided to the ECO/auditor is factual and true.
- ii. The audit is based purely on the conditions as stipulated in the EAs and EMPs.
- iii. The construction phase is currently underway and operational phase activities are not applicable.
- iv. Documentation / reports were randomly sampled / reviewed in order to accommodate time constraints.
- v. Where visual observations were not possible either due to physical access constraints or safety constraints, the ECO/auditor used other means to determine compliance, either through requesting written evidence provided by contractors / service providers who service the site or via interviews with technical site-based staff.

## 17 CONSULTATION PROCESS

The approach of consultation followed during the environmental audit was based on written (email) and telephonic correspondence between the ECO/auditor and the Environmental Site Compliance Officer which also includes consultation and communication with the EA holder and competent authority in terms of report submission.

## 18 FINDINGS

Findings are listed in the attached checklists, and it should be noted that findings should be considered individually in the context of the full audit and each condition and associated rating.

The following findings were noted onsite:

- Clearance of alien vegetation partly done on the cleared areas and stockpiles
- Dust has become an issue especially on the cleared areas.
- Over water was observed on site which created mud on site.
- During this month the contractor has abstracted from an additional source of water other than the borehole to supplement water supply onsite. The water is supplied by an irrigation water scheme under the Sand-vet Water Users Schemes. The source is licenced.
- Some trenches were observed as not being barricaded.
- Excess topsoil is being moved from cleared area to a place near the main gate for temporary storage.
- Heritage area is barricaded to prevent disturbance from the topsoil that is being stockpiled near the heritage site.
- Cleared alien vegetation not removed from the areas where it was cleared, this may result in the plants dispersing seeds.
- Waste recycling was observed being undertaken on site.
- Waste area concrete slab has been bunded.
- Large quantities of wood pallets were observed on the waste area; these have a potential to create a fire hazard.

Based on the outcomes of the audit it was established that the objectives of the EAs and EMPs were achieved in terms of:

- Sufficiently providing for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis.*
- Ensuring compliance with the provisions of environmental authorisation and EMPs.*

### **18.1 Minor improvements required.**

- Improve on water usage.
- Donate wood pallets

### **18.2 Major improvements required.**

- Clearance of all alien vegetation must progress faster before the onset of rains.
- Trenches must be barricaded.
- Cleared alien vegetation must be removed.

## 19 AUDIT SUMMARY

In terms of the findings and results of the **August 2025** ECO audit, the project achieved an overall **99.16%** compliance rating with the conditions of the EAs and EMPs.

**Table 4:** Compliance Scoring

| No.                                       | Audit criteria                                                                             | Compliant (C) | Partially Compliant (PC) | Major-non-Compliant (NC) | Work in Progress | Normative (info) | Not Applicable / Not Audited (NA) | Percentage Score      |
|-------------------------------------------|--------------------------------------------------------------------------------------------|---------------|--------------------------|--------------------------|------------------|------------------|-----------------------------------|-----------------------|
| 1                                         | Environmental Authorisation for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1) | 25            | 0                        | 0                        | 1                | 20               | 2                                 | (100%)                |
| 2                                         | Environmental Authorisation for Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)   | 25            | 0                        | 0                        | 1                | 20               | 2                                 | (100%)                |
| 3                                         | Environmental Authorisation for Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)   | 25            | 0                        | 0                        | 1                | 20               | 2                                 | (100%)                |
| 4                                         | EMPr for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)                        | 264           | 13                       | 0                        | 0                | 15               | 29                                | (98%)                 |
| 5                                         | EMPr Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)                              | 266           | 10                       | 0                        | 0                | 15               | 29                                | (98%)                 |
| 6                                         | EMPr Virginia 3 Solar Park (DFFE REF NO: 14/12/16/3/3/2/2101)                              | 237           | 5                        | 0                        | 0                | 42               | 39                                | (98%)                 |
| Overall total no. conditions              |                                                                                            | 842           | 28                       | 0                        | 3                | 131              | 103                               |                       |
| Audited conditions                        |                                                                                            | 1684          | 28                       | 0                        | -                | -                | -                                 | (Potential max score) |
| Overall Compliance Rating Calculation (%) |                                                                                            | 99.13%        |                          |                          |                  |                  |                                   |                       |

## 20 RECOMMENDATIONS

**Based on the findings identified the following is recommended:**

- Alien vegetation clearance must continue onsite, more resources must be allocated towards alien vegetation removal.
- All trenches must be barricaded at the end of each working day.
- All equipment must be equipped with a drip tray.
- Spillages must be cleaned promptly
- Truck drivers must be trained on handling topsoil
- Cleared alien vegetation must be taken to the landfill.
- Spillages must be cleaned promptly.

## 21 CONCLUSION

The contractor must ensure that systems and resources to monitor and manage environmental risks and impacts adequately are in place. Resources and personnel to train employees on the contents of the EMPs must be made to ensure that the project runs effectively and efficiently with minimal impact to the biophysical and socio-economic environment.

In general, the EMPs are effective in their current format in terms of content and relevance and there are no major shortcomings. The EMP's sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with this project.



**PREPARED BY:**

A handwritten signature in black ink, appearing to read 'Sakaunda'.

**Sakaunda Jennipher**

Environmental Control Officer

NCC Operations (Pty) Ltd

**M** ·069 510 7630

**E** · [jenniphers@ncc-group.co.za](mailto:jenniphers@ncc-group.co.za)

**REVIEWED BY:**

A handwritten signature in black ink, appearing to read 'Nick Gates'.

**Nick Gates**

Head of Environmental Management Services

NCC Group (Pty) Ltd

**M** ·073 1998 431

**E** ·[nickg@ncc-group.co.za](mailto:nickg@ncc-group.co.za)

## ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

### Open Concerns/Complaint

| No | Observation date | Concern/Complaint | Suggested Due Date <sup>1</sup> | Proposed Corrective Action | Status | Closure status |
|----|------------------|-------------------|---------------------------------|----------------------------|--------|----------------|
|    |                  |                   |                                 |                            |        |                |

*\*The concerns register is updated once the ECO is present on site.*

### Closed Concerns

| No | Observation date | Concern/Complaint | Due Date suggested by ECO | Corrective Action Taken | Outcome | Closure status |
|----|------------------|-------------------|---------------------------|-------------------------|---------|----------------|
|    |                  |                   |                           |                         |         |                |
|    |                  |                   |                           |                         |         |                |

## ANNEXURE B - NCR REGISTER

| Ref No. | Originator | Dated Issued | Description | Proposed Corrective Action | Closure Status | Closure Date | Further Action Required |
|---------|------------|--------------|-------------|----------------------------|----------------|--------------|-------------------------|
|         |            |              |             |                            |                |              |                         |

## ANNEXURE C - INCIDENT REGISTER

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                       | Volume                            | Remedial Action                                              |                                                                                |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|--------------------------------------------------------------|--------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                    |                                   | Immediate<br>Corrective Actions                              | Preventative<br>measures                                                       |
| 20/03/2025 | Waste water                                                                                     | Soil pollution                                                                               | On 20, 2025, at approximately 8:28, the conservative tank being used to collect wastewater from conservancy tank had overfilled, and a Spillage had occurred spillage of approximately 8-10 litres of wastewater mixed with the cleaning material. the toilet supplier attended to the spill immediate & initiated spill Clean-up. Contaminated soil was taken to the hazardous waste skip.   | 10 l (below Section 30 threshold) | Clean- up must be done as soon as the spills are identified. | The conservancy tank must be emptied more frequently to reduce overfilling.    |
| 19/03/2025 | Waste water                                                                                     | Soil pollution                                                                               | Approximately 12 litres of wastewater mixed with the cleaning chemicals where toilets are located. The toilet had been leaking since the previous day and wastewater was contained in a drip tray. The toilet supplier was notified, and he came to service<br><br>The toilets; however, during servicing; the drip tray spilled over causing the spillage of the wastewater onto the ground. | 12l (below Section 30 threshold)  | Clean- up must be done as soon as the spills are identified. | Leaking toilets must not be allowed onsite.                                    |
| 08/03/2025 | Diesel spillage                                                                                 | Soil pollution                                                                               | On 08 March 2025 at 05:30, security supervisor discovered a diesel leakage during the morning patrol. The spillage occurred due to the diesel injectors that were loose one of them was not properly fitted and diesel pressure removed them while the bakkie was in motion.                                                                                                                  | 20l (below Section 30 threshold)  | Clean- up must be done as soon as the spills are identified  | Vehicles must be maintained regular. only road worthy vehicles must be onsite. |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                 | Volume                                      | Remedial Action                                             |                                                                                |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                              |                                             | Immediate<br>Corrective Actions                             | Preventative<br>measures                                                       |
| 07/03/2025 | Water and<br>antifreeze                                                                         | Soil pollution                                                                               | The Driver parked the minibus on site, shortly a leak observed containing a mixture of water and antifreeze, while also exhibiting signs of overheating.                                                                                                                                                                                                                | -                                           | Clean- up must be done as soon as the spills are identified | Vehicles must be maintained regular. only road worthy vehicles must be onsite. |
| 06/05/2025 | Water mixed with<br>antifreeze spillage                                                         | Soil pollution                                                                               | On 6 May 2025 at 14:00, the TLB Operator was busy moving spoil material near the access road to the allocated spoil Stockpile area, when the TLB, radiator fan belt snapped & the container that stores water & antifreeze busted. Approximately 5 Liters of water with antifreeze spilled                                                                              | 5 litres<br>(below Section 30<br>threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.                  |
| 08/05/2025 | Toilet Cleaner<br>mixed with water<br>spillage                                                  | Soil pollution                                                                               | A chemical toilet in PV3 at the laydown area at around 3:53 pm, 08 May 2025 was reported to be leaking, when the toilet was assessed, it was identified that there was a broken pipe that leaked the chemical water. An immediate action was taken to clean up the spillage. The contaminated soil was collected into the bags and taken to site waste management area. | 6 litres (below<br>Section 30<br>threshold) | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent.         |
| 12/05/2025 | Diesel spillage                                                                                 | Soil pollution                                                                               | On 12-05-2025 at 06:40, the ambulance was on the way to the access control point along the main access road, when it had a sudden breakdown and diesel was spilled along the access road, leaving a trail of diesel spill for approximately +-400 Metres. Approximately +-2 Litres of diesel was spilled                                                                | 2 litres (below<br>Section 30<br>threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.                  |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Volume                                                  | Remedial Action                                                    |                                                                                               |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|--------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                         | Immediate<br>Corrective Actions                                    | Preventative<br>measures                                                                      |
| 15/05/2025 | Hydraulic oil<br>spillage                                                                       | Soil pollution                                                                               | On the 15/05/2025, a side tipper truck was transporting spoil material when the cylinder failed and spilled ~7 litres of hydraulic oil, about 455m from the nearest watercourse. The contaminated soil was promptly cleaned up.                                                                                                                                                                                                                                                                                                                  | 7 litres ( <i>below<br/>Section 30<br/>threshold</i> )  | Clean- up must be<br>done as soon as the<br>spills are identified  | All Vehicles must be<br>serviced regularly to<br>reduce breakdowns.                           |
| 20/05/2025 | Toilet Cleaner<br>mixed with water<br>spillage                                                  | soil pollution                                                                               | It was around 11:30 am when it was reported that there was a spillage, that when the Fidamo team was about to clean the toilets at Pv1 Laydown area, a pipe from the generator busted and the water leaked from the broken pipe. The water that spilled was approximately 3-4 Liters and the pipe was immediately stopped. The chemical that was in the water is blue splash Toilet chemical. An immediate action was taken to clean up the spillage. The contaminated soil was collected into the bags and taken to site waste management area. | 4 litres ( <i>below<br/>Section 30<br/>threshold</i> )  | Clean- up must be<br>done as soon as the<br>spills are identified  | The<br>maintenance/servicing<br>of the toilets is to be<br>made more stringent.               |
| 21/05/2025 | Fauna                                                                                           | Loss of<br>biodiversity                                                                      | On the 21/05/2025 a snake was fatally wounded during the internal road construction works.                                                                                                                                                                                                                                                                                                                                                                                                                                                       | N/A                                                     | The dead animal was<br>buried.                                     | N/A                                                                                           |
| 26/05/2025 | Hydraulic oil<br>spillage                                                                       | Soil pollution                                                                               | On 26/05/2025, at around 16:50 a drill rig operator noticed a leak from the machine, he immediately reported the leak to the supervisor. The supervisor called the mechanic but did not report the spillage. The oil further spilled to the soil during the repair attempts which were done under poor lighting. The spillage was left overnight and was only reported to the EO the next morning when the shift began.                                                                                                                          | 25 litres ( <i>below<br/>Section 30<br/>threshold</i> ) | Clean- up must be<br>done as soon as the<br>spills are identified. | The ESCO issued NCR<br>to the subcontractor<br>for failing to report<br>spillage immediately. |

| Date       | Type                                                                                           | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                             | Volume                                                                                     | Remedial Action                                                                                                           |                                                                                                                              |
|------------|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna &Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                            | Immediate<br>Corrective Actions                                                                                           | Preventative<br>measures                                                                                                     |
| 11/06/2025 | Concrete and oil<br>Spillage                                                                   | Soil pollution                                                                               | On the 11 <sup>th</sup> of June 2025 the concrete mixer truck overturned resulting in the spillage of an estimated 3m3 (3 cubic meters) of concrete and approximately 8litres of diesel. The contractor removed the spilled concrete and dumped it on the natural area adjacent to the road                                                                                                                                                         | 8 litres of diesel<br>and 3m3 of<br>concrete ( <i>below<br/>Section 30<br/>threshold</i> ) | Clean- up must be<br>done as soon as<br>possible and an<br>investigation must<br>be done on the cause<br>of the accident. | The ESCO issued an<br>NCR to the<br>subcontractor for<br>failing to report<br>dumping concrete on<br>the natural vegetation. |
| 16/06/2025 | Toilet Cleaner<br>mixed with water<br>spillage                                                 | Soil pollution                                                                               | At 08:32am, on the 16th of June 2025, The Client (Robin) reported that ABLON's Ablution facilities were leaking which resulted to soil contamination, we immediately stopped everyone from using the Toilet and reported the issue to our service provider. A drip tray was placed immediately underneath the toilet. The event occurred at the OHL Site Camp and the name of the chemical that spilled on the ground is Portabloo Toilet Chemical. | 30 litres ( <i>below<br/>Section 30<br/>threshold</i> )                                    | The contaminated<br>soil was removed<br>using shovel and the<br>soil was contained in<br>a hazardous waste<br>bin.        | The cause of the<br>slippages must be<br>investigated. Toilets<br>that continue to leak<br>must be replaced.                 |
| 24/06/2025 | Toilet Cleaner<br>mixed with water<br>spillage                                                 | Soil pollution                                                                               | At around 8 am on the 24/06/2025 a spillage was reported by the contractor. Approximately 30 litres of Toilet Blue was spilled at the Virginia 1 laydown area. The spillage was cleaned up and the contaminated soil removed for disposal.                                                                                                                                                                                                          | 30 litres ( <i>below<br/>Section 30<br/>threshold</i> )                                    | The contaminated<br>soil was removed<br>using shovel and the<br>soil was contained in<br>a hazardous waste<br>bin.        | The cause of the<br>slippages must be<br>investigated. Toilets<br>that continue to leak<br>must be replaced.                 |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Volume                                                  | Remedial Action                                                                                     |                                                                    |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|-----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                         | Immediate<br>Corrective Actions                                                                     | Preventative<br>measures                                           |
| 08/07/2025 | Hydraulic Oil<br>Spillage                                                                       | Soil pollution                                                                               | A tipper truck spilled some hydraulic oil when the driver was offloading some excavated material at PV2 I8 road on the 08h of July 2025. The driver lifted the truck to off load the material when it was halve way up, he discovered that the body of the truck was swinging to the sides and he tried to stop, and discovered some oil leaks from the hydraulic cylinder, about +-9 litres of oil spilled to the ground and it was reported to the EO, immediately the supervisor and the driver cleaned the spillage and the contaminated soil was collected into bags and taken to ABC Solar Waste management area. | 30 litres ( <i>below<br/>Section 30<br/>threshold</i> ) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | Vehicles that are constantly breaking down must be moved off site. |

## **ANNEXURE D – PHOTOGRAPHS**





**Figure 1:** Compaction of topsoil.



**Figure 2:** Nuisance due to water from the bowser



**Figure 3:** Cleared alien vegetation must be removed disposal.



**Figure 4:** Alien vegetation.





**Figure 5:** Large pile wood pallets.



**Figure 6:** Bundled waste area



**THIS PAGE WAS INTENTIONALLY LEFT BLANK**

**SEPTEMBER 2025**



---

# ECO MONTHLY ENVIRONMENTAL MONITORING REPORT

Virginia OPHL Line and Switching Station Matjhabeng,  
Lejweleputswa District Municipality within the jurisdiction  
of the Free State Province.

---

**PREPARED FOR:**

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

Department of Forestry, Fisheries, and the Environment: Compliance Monitoring

**DATED:**

September 2025

**PREPARED BY:**

NCC Operations

**T** • 021 702 2884

**E** • [info@ncc-group.co.za](mailto:info@ncc-group.co.za)

## DECLARATION OF INDEPENDENCE

I, Jennipher Sakaunda, as duly authorised representative of NCC Operations (Pty) Ltd ("**NCC**"), hereby confirm my independence (as well as that of NCC) as an auditor and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which URSA Energy (Pty) Ltd has appointed NCC as Environmental Control Officer ("**ECO**"), other than fair remuneration for work performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'J Sakaunda', is positioned below the 'Signed:' text.

**Jennipher Sakaunda**

03 October 2025

Environmental Control Officer

NCC Operations (Pty) Ltd



## **LIABILITY DISCLAIMER AND CONFIDENTIALITY CLAUSE**

All inspections conducted, as well as reports and recommendations provided by NCC are purely advisory. They are primarily intended for the purpose of assisting clients in loss control, risk management as well as health, safety, and environmental procedures.

Observations and recommendations are the result of practices and conditions observed, and information made available to us in various forms at the time of our visit. They do not purport to refer to or guarantee compliance with local or government regulations which may be applicable to such practices and conditions. This report should not be considered a definitive listing of all existing risks nor an absolute solution to all indicated risks, or hazards present from time to time in the Client Organisation. The report should always be considered in its entirety; individual sentences, paragraphs or sections of the report should not be used in isolation.

This report should not be reproduced except in its entirety, including this liability disclaimer or contents reproduced or disclosed to any third party without the prior written approval of NCC.

NCC assumes no responsibility for any losses incurred as a result of the implementation, management, and operation of recommended health, safety and environmental systems, processes and procedures.

## DOCUMENT CONTROL

|                     |                                             |
|---------------------|---------------------------------------------|
| <b>REPORT TITLE</b> | Monthly ECO Environmental Monitoring Report |
| <b>PROJECT</b>      | Virginia OPL Line and Switching Station     |
| <b>LOCATION</b>     | Free State Province                         |
| <b>EA HOLDER</b>    | URSA Energy (Pty) Ltd                       |
| <b>ECO</b>          | NCC Operations (Pty) Ltd                    |
| <b>REVISION</b>     | 00                                          |
| <b>DATE</b>         | 03/10/2025                                  |

| Revision | Date       | Description                  |
|----------|------------|------------------------------|
| Rev 00   | 03/10/2025 | First Draft - Internal       |
| Rev 01   | TBC        | Final - Authority submission |

## REPORT DISTRIBUTION LIST

| Name                   | Organisation                      | Issued     | Format     |
|------------------------|-----------------------------------|------------|------------|
| Janine Brasington      | Red Rocket South Africa (Pty) Ltd | 03/10/2025 | Electronic |
| Serina Pillay          | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Maggie Logan           | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Director of Compliance | DFFE                              | TBC        | Electronic |

## TABLE OF CONTENTS

|                                                    |           |
|----------------------------------------------------|-----------|
| <b>TABLE OF FIGURES .....</b>                      | <b>7</b>  |
| <b>ABBREVIATIONS .....</b>                         | <b>8</b>  |
| <b>1 INTRODUCTION .....</b>                        | <b>9</b>  |
| 1.1 Background.....                                | 9         |
| 1.2 Audit Scope and Purpose.....                   | 11        |
| 1.3 Monitoring Frequency and Reporting.....        | 11        |
| <b>2 AUDITOR BACKGROUND. ....</b>                  | <b>12</b> |
| <b>3 GENERAL (NOTABLE EVENTS) .....</b>            | <b>13</b> |
| 3.1 General Outstanding matters.....               | 13        |
| 3.2 Audits (Internal and External).....            | 13        |
| <b>4 WASTE MANAGEMENT.....</b>                     | <b>14</b> |
| 4.1 Domestic/ General Waste.....                   | 14        |
| 4.2 Hazardous waste.....                           | 14        |
| 4.3 Wastewater .....                               | 15        |
| <b>5 PROTECTIVE MEASURES .....</b>                 | <b>15</b> |
| 5.1 General .....                                  | 15        |
| <b>6 ENVIRONMENTAL CONSERVATION.....</b>           | <b>16</b> |
| 6.1 Conservation of Flora and Fauna.....           | 16        |
| 6.2 Water Management.....                          | 16        |
| 6.3 Soil Management .....                          | 16        |
| 6.4 Stormwater and Erosion onsite .....            | 17        |
| <b>7 INFRASTRUCTURE MANAGEMENT.....</b>            | <b>17</b> |
| 7.1 Access Roads.....                              | 17        |
| 7.2 Fences, Gates, and Barricading.....            | 17        |
| 7.3 Buildings and Structures .....                 | 17        |
| <b>8 SOCIAL RESPONSIBILITY.....</b>                | <b>17</b> |
| <b>9 ENVIRONMENTAL AWARENESS AND TRAINING.....</b> | <b>18</b> |
| <b>10 HERITAGE.....</b>                            | <b>18</b> |
| <b>11 WARNING &amp; NCRS.....</b>                  | <b>18</b> |

|           |                                                        |           |
|-----------|--------------------------------------------------------|-----------|
| <b>12</b> | <b>REHABILITATION .....</b>                            | <b>18</b> |
| <b>13</b> | <b>INCIDENTS AND ACCIDENTS .....</b>                   | <b>19</b> |
| <b>14</b> | <b>MEETINGS AND OTHER CORRESPONDANCE.....</b>          | <b>19</b> |
| <b>15</b> | <b>AUDIT METHODOLOGY.....</b>                          | <b>20</b> |
| 15.1      | Audit Process.....                                     | 20        |
| 15.2      | Observation and Recommendation Determination.....      | 21        |
| 15.3      | Findings.....                                          | 21        |
| 15.4      | Audit Tables and Compliance Ratings.....               | 21        |
| <b>16</b> | <b>ASSUMPTIONS AND LIMITATIONS .....</b>               | <b>23</b> |
| <b>17</b> | <b>CONSULTATION PROCESS.....</b>                       | <b>23</b> |
| <b>18</b> | <b>FINDINGS .....</b>                                  | <b>24</b> |
| 18.1      | Minor improvements required. ....                      | 24        |
| 18.2      | Major improvements required.....                       | 25        |
| <b>19</b> | <b>AUDIT SUMMARY.....</b>                              | <b>26</b> |
| <b>20</b> | <b>RECOMMENDATIONS .....</b>                           | <b>27</b> |
| <b>21</b> | <b>CONCLUSION.....</b>                                 | <b>27</b> |
|           | <b>ANNEXURE A – CONCERNS/COMPLAINTS REGISTER .....</b> | <b>29</b> |
|           | <b>ANNEXURE B - NCR REGISTER .....</b>                 | <b>29</b> |
|           | <b>ANNEXURE C - INCIDENT REGISTER.....</b>             | <b>30</b> |
|           | <b>ANNEXURE D – PHOTOGRAPHS .....</b>                  | <b>36</b> |
|           | <b>THIS PAGE WAS INTENTIONALLY LEFT BLANK .....</b>    | <b>42</b> |

## TABLE OF FIGURES

|                                                                                         |    |
|-----------------------------------------------------------------------------------------|----|
| Figure 1: Sensitive areas that must be demarcated.....                                  | 37 |
| Figure 2: Alien vegetation on stockpiles. ....                                          | 37 |
| Figure 3: Torn barricade must be recycled.....                                          | 38 |
| Figure 4: Water ponding on the laydown area.....                                        | 38 |
| Figure 5: Groundwater being pumped out of excavations. ....                             | 39 |
| Figure 6: Pylons (material) onsite. ....                                                | 39 |
| Figure 7: Concrete must be disposed correctly.....                                      | 40 |
| Figure 8: Wastewater in the concrete casting container must be disposed correctly. .... | 40 |
| Figure 9: Trucks with on drip trays. ....                                               | 41 |
| Figure 10: Leaking waste bund .....                                                     | 41 |

## ABBREVIATIONS

|             |                                                         |
|-------------|---------------------------------------------------------|
| <b>BAR</b>  | Basic Assessment Report                                 |
| <b>CA</b>   | Competent Authority                                     |
| <b>DEA</b>  | Department of Environmental Affairs (now DFFE)          |
| <b>DFFE</b> | Department of Forestry, Fisheries, and the Environment  |
| <b>DWS</b>  | Department of Water and Sanitation                      |
| <b>EA</b>   | Environmental Authorisation                             |
| <b>EAP</b>  | Environmental Assessment Practitioner                   |
| <b>ECO</b>  | Environmental Control Officer                           |
| <b>EIA</b>  | Environmental Impact Assessment                         |
| <b>EMPr</b> | Environmental Management Programme                      |
| <b>EO</b>   | Environmental Officer (Contractor)                      |
| <b>ER</b>   | Employer's Representative                               |
| <b>ESCO</b> | Environmental Site Compliance Officer                   |
| <b>kV</b>   | Kilovolt                                                |
| <b>MVA</b>  | Megavolt Amperes                                        |
| <b>MW</b>   | Megawatt                                                |
| <b>NCC</b>  | NCC Operations                                          |
| <b>NCR</b>  | Non-Compliance Report                                   |
| <b>NEMA</b> | National Environmental Management Act (No. 107 of 1998) |
| <b>NWA</b>  | National Water Act (No. 36 of 1998)                     |
| <b>OHPL</b> | Overhead Power Line                                     |
| <b>SDC</b>  | Safe Disposal Certificate                               |
| <b>SHE</b>  | Safety, Health, and Environment                         |
| <b>SS</b>   | Substation                                              |
| <b>TBC</b>  | To Be Confirmed                                         |

# 1 INTRODUCTION

## 1.1 Background

NCC Operations (Pty) Ltd ("**NCC**") was appointed by URSA Energy (Pty) LTD ("**URSA**") to provide a suitably experienced independent Environmental Control Officer ("**ECO**") for the construction phase of Virginia Solar Park which will be connected to the Eskom Theseus Main Transmission Substation (MTS). The site is located on Farm Blomskraal 216, Ventersburg RD located within the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province. On completion the facility will consist of the Photovoltaic (PV) Power Plant with a maximum generation capacity up to 100 MW, a 132kV powerline connecting the substation to the Eskom Theseus substation which is located 16.2 km North-East of the north-western corner of project site.

The ECO has the responsibility of ensuring the mitigation/ rehabilitation measures and conditions referred to in the Environmental Authorisation ("**EA**") are implemented, as well as ensuring compliance with the requirements of the Environmental Management Programme ("**EMPr**"). This report provides an insight into the overall compliance performance and a summary of other environmental concerns and potential environmental risks through observations during site inspections.

This report is based on the following environmental conditions or requirements:

- a) Environmental Authorisations (EA)
  - 1) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
  - 2) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)
- b) Environmental Management Programmes (EMPr)
- c) Relevant environmental legislation.
- d) All other environmental permits, licenses, and authorisations.

The notification of commencement of construction was submitted to the DFFE for Virginia Solar Plant (Pty) Ltd on the 02 May 2024.

This report addresses conditions set out in the EA which states the ECO as part of their duties: "*The ECO must keep record of all activities on site, problems identified, transgressions noted, and a task schedule of tasks undertaken by the ECO.*" As per the roles and responsibilities in the Virginia Solar Project ("**VSP**") EMPr, the

primary role of the ECO will be to monitor the construction activities and ensure that the mitigation measures of the EMPr and Environmental Authorisations (EA) are implemented. This report also includes an audit checklist for the VSP EA as follows:

- 1) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
- 2) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)

A summary of the various environmental requirements i.e. the audit criteria relating to the overall project is provided in **Table 1**.

**Table 1:** Summary of environmental requirements / criteria relating to the overall project.

| Components of overall project         | Environmental requirements / criteria |               |                                |              |
|---------------------------------------|---------------------------------------|---------------|--------------------------------|--------------|
|                                       | DFFE EA Ref No.                       | Issue date    | Approved EMPr<br>(Compiled by) | Date         |
| Virginia Solar Park Switching Station | 14/12/16/3/3/2/2099/2                 | 20 April 2022 | Terramanzi Group (Pty) Ltd     | October 2023 |
| Virginia Solar Park OHPL              | 14/12/16/3/3/1/2444                   | 02 Feb 2022   | Terramanzi Group (Pty) Ltd     | October 2023 |

This report represents the monitoring for the Construction Phase. The responsibility of enforcement of the conditions of the EAs and EMPrs lies with the Project and Project Manager, while the Department of Forestry, Fisheries, and the Environment (“DFFE”) Environmental Management Inspectorate (“EMI”) may also enforce existing and potentially new conditions through compliance notices.

An Environmental Site Compliance Officer (“ESCO”) has been appointed by the holder of the EA to monitor the project compliance onsite on a full-time basis on behalf of the EA holder. The responsibilities of the ESCO includes:

- Monitoring conditions of the Basic Assessment Reports (“BARs”), Environmental Impact Report (EIR) EAs and the EMPrs.
- Ensuring compliance with all relevant environmental legislation.
- Approving method statements (reviewed by the ECO and co-approved by Site Manager).
- Remaining employed until the completion of the construction activities.
- Reporting to the Project Manager, including all findings identified onsite.



- Reporting any significant findings to the ECO.
- Preparing and submitting monthly reports to the ECO and Project Manager.
- Monitoring compliance by the Contractor.

In addition, the ESCO will:

- Undertake daily inspections of the site and surrounding areas.
- Audit compliance with the EMPr and conditions of the environmental authorisation.
- Take appropriate action if the specifications contained in the EMPr and conditions of the environmental authorisation are not followed.
- Monitor and verify that environmental impacts are kept to a minimum, as far as possible; and
- Ensure that activities onsite comply with all relevant environmental legislation.

## **1.2 Audit Scope and Purpose.**

In accordance with Regulation 34 of the 2014 NEMA EIA Regulations (as amended) the holder of an environmental authorisation must, for the period during which the EA and EMPr, and where applicable the closure plan, remain valid —

- a) Ensure that the compliance with the conditions of the EA and the EMPr, and where applicable the closure plan, is audited; and*
- b) Submit an environmental audit report to the relevant competent authority.*

The purpose of this environmental audit is to verify compliance to the overarching environmental requirements specified as conditions of the EAs and EMPrs, and report on the extent to which the objectives of the EMPrs and are being achieved.

## **1.3 Monitoring Frequency and Reporting.**

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 30<sup>th</sup> of September 2025 after which this report was compiled which serves to document and audit. This report covers the monthly reporting for the month of September 2025.

## 2 AUDITOR BACKGROUND.

NCC is a multi-disciplinary environmental consulting company based in South Africa which adopts a 'values driven' approach with a common purpose to conserve and create sustainable environments that enable people, planet and business to thrive. We are a trusted partner to major engineering and construction firms, mines, parastatals, film, sports and event production companies, municipalities, provincial and national government, and conservation organisations. Drawing on our years of experience on a wide range of projects, NCC works with our clients to develop, implement, and monitor customised services that add real value.

The auditor, **Jennipher Sakaunda**, is a senior environmental manager with more than 14 years' experience currently employed with NCC. Jennipher Sakaunda has experience in several environmental fields including environmental compliance monitoring and auditing, due diligence assessment, environmental impact and risk assessment, and compilation of environmental management plans/programmes.

**Table 2:** Details of the auditor.

|                       |                                                                                                                                                                                                |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Company</b>        | NCC Operations (Pty) Ltd                                                                                                                                                                       |
| <b>Auditor</b>        | Jennipher Sakaunda                                                                                                                                                                             |
| <b>Tel</b>            | +27 21 702 2884                                                                                                                                                                                |
| <b>Mobile</b>         | +27 69 510 7630                                                                                                                                                                                |
| <b>Email</b>          | <a href="mailto:jenniphers@ncc-group.co.za">jenniphers@ncc-group.co.za</a>                                                                                                                     |
| <b>Address</b>        | 26 Bell Close, Westlake Business Park Westlake, 7945                                                                                                                                           |
| <b>Affiliation</b>    | International Association of Impact Assessment South Africa.<br>Environmental Assessment Practitioner Association of South Africa.<br>South African Council of Natural Scientific Professions. |
| <b>Qualifications</b> | BSc (honors) Environmental Management                                                                                                                                                          |
| <b>Expertise</b>      | A detailed CV can be provided on request.                                                                                                                                                      |

### 3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (September 2025) included the following:

- Excavation of monopole foundations.
- Cast blinding slab and steel fixing at the OHL.
- Filling and compaction of borrow material.
- Construction of the internal road connecting the access road to the Temporary Site Offices (TSF) and Switching Station.
- Fencing.
- Reworking of the rain damaged portions of the access road.
- Construction of the temporary stormwater berm.

#### 3.1 General Outstanding matters

Any major outstanding matters are to be recorded and summarised in the Concerns Register (**Annexure A**). The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

#### 3.2 Audits (Internal and External)

Internal audits are undertaken monthly by the Red Rocket ESCO. This ECO Audit was undertaken on the 30<sup>th</sup> of September 2025. Audit tables/checklists are attached to this report. The ECO undertakes external monthly audits.

## 4 WASTE MANAGEMENT

The contractor must make provision for waste avoidance, minimisation, and separation of waste where possible through recycling efforts. Waste management awareness must be done on an ongoing basis and must be provided through toolbox talks and awareness posters. A waste station was constructed at V3 where waste is temporarily stored, sorted and recycled. The waste station includes a bund where waste will be stored and various compartments where waste will be sorted into. The contractor must ensure that the waste area has a roof to protect waste from weather elements. The contractor is constructing a sump on the waste area where wastewater will collect into. The bund was observed to be leaking rainwater; the area must be resealed to prevent soil and water pollution. Recyclables are being stored until there are enough quantities to transport to Mpact for recycling. Large quantities of wood pallets and plastic straps were observed onsite. Waste must be removed more frequently to prevent stocking large quantities onsite.

### 4.1 Domestic/ General Waste

Approximately **295 kg** of general waste, **0.13** tonnes of cleared vegetation and **99 kg** of wooden shipping boxes were removed from site in the month of September 2025. Waste bins are placed along the OHL line where each team will be working, at the end of the day waste is collected and placed at the laydown areas for temporary storage. Designated waste areas have been provided at the contractors' main site offices/laydown areas for purposes of temporary storage of waste prior to collection and transferal to the licensed waste facilities. Bins at the laydown area are colour coded for each waste type. The contractor has commenced with taking waste for recycling.

The service providers dispose the general waste at Matjhabeng Local Municipality waste disposal site-Licence number: B33/2/340/21/P8 16/2/7/C404/D2/Z1/P367. Proof of disposal is available on request.

### 4.2 Hazardous waste

Hazardous waste skips are available at the dedicated waste storage area at each of the sub-contractors' site offices/lay down areas. No hazardous waste was disposed of in September 2025. Hazardous waste in form of oil spillages, cement spillages and contaminated soil is kept onsite until there is enough to dispose. No major spillages have been recorded on site. A container that was used as for casting concrete blocks has rain accumulate water and mosquito larvae was observed. The wastewater and concrete must be disposed of as hazardous.

### 4.3 Wastewater

Approximately **42497 L** of sewerage waste was generated on site in the month of September 2025. Chemical toilets and a conservancy tank have been provided onsite. No incidents' spillages from the chemical toilets have been recorded. The contractor must ensure these chemical toilets are serviced regularly and drip trays are placed under each toilet.

The General Authorisation that was issued by DWS for the includes the use of a conservancy tank up to a capacity of 50 000 L. The conservancy tank onsite has a capacity of 12 500 L which is below the stipulated GA threshold. The contractor must ensure that this capacity is not exceeded.

The Appointed Service Provider removes sewage and disposes of it at Matjhabeng Local Municipality wastewater treatment facility - Licence No: 10/D4/J/G/2082. Proof of disposal is available onsite. The contractor must ensure the appointed service provider is licenced to provide sewer removal services. With the work being spread out on the lines the contractor must ensure ablutions are within walking distance within the areas where people are working.

## 5 PROTECTIVE MEASURES

### 5.1 General

Protective measures have been deployed to mitigate environmental impacts or prevent impacts from occurring which includes:

- Security guards are present on the site, with access control in place.
- Induction training is conducted for all persons working and visiting the site.
- Snake gaiters are provided.
- Spill kits are available on site.
- No-go areas are demarcated and provided with signage.
- Access cards are used to enter and exit the site.
- Rapid alcohol detecting is in place.

## 6 ENVIRONMENTAL CONSERVATION

### 6.1 Conservation of Flora and Fauna

A permit to clear the site and relocate species of concern was received from the Free state Department of Economic, Small Business Development, Tourism and Environmental Affairs. The permit with Ref No. 202306000012649 was issued on 08/06/2023 to pluck protected and unprotected flora.

Clearance of alien vegetation has is in progress, however the pace at which the contractor is removing alien vegetation is concerning especially with the onset of rains is expected in September. More resources must be allocated towards alien vegetation removal. It is important that the contractor clears all the alien vegetation as some of the alien plants will soon be dispersing seed creating a seed bank. The contactor must monitor the cleared areas to ensure alien vegetation does not re-establish. The contractor must make an effort to remove the stockpiled alien vegetation to the Matjhabeng Local Municipality for disposal.

### 6.2 Water Management

Approximately **386 m<sup>3</sup>** of water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The GA allows for abstraction of 43 000m<sup>3</sup> annually, the contactor must ensure water abstraction does not exceed the licenced volumes. The contactor also abstracted **2218 m<sup>3</sup>** of water from Sluice 16, another licenced source. Groundwater that was encountered on some of pits is being pumped out before excavation are backfilled or concrete is poured.

### 6.3 Soil Management

Cleared topsoil has been stockpiled along the OHL line and the switching station. These must be protected from erosion and alien vegetation establishment. In some areas where the contractor has finished pouring concrete and the pits have closed. The contactor must ensure subsoil is used for infilling. Topsoil must only be spread after the structures have erected to prevent compaction. Groundwater encountered during excavation must be pumped out before concrete is poured to prevent ground water contamination.

#### **6.4 Stormwater and Erosion onsite**

The contractor's Stormwater Management Plan was approved, although measures to manage erosion as per the approved SWMP have been implemented signs of erosion and water ponding were observed. The SWMP must be revised to reflect the current conditions onsite. Measures to divert clean stormwater away from the works towards the watercourses must be implemented.

### **7 INFRASTRUCTURE MANAGEMENT**

#### **7.1 Access Roads**

The project team is using existing farm roads for current construction activities until such time as the project access roads and internal roads have been constructed. Since water ponding and erosion was observed on the roads maintenance work must be done. Maintenance of the access roads must be done on a regular basis.

#### **7.2 Fences, Gates, and Barricading**

The site is fenced with security personnel manning the gates. Access cards are used to allow entrance to site. Barricading was observed on site, and such should continue to be maintained around all open excavations along the OHPL servitudes to prevent potential fauna (wildlife and livestock) incidents. The contractor has put temporary fences which is more secure on some of the pits where work will continue at a later stage. Pits with ground water must be barricaded with temporary fences to prevent animals from falling into the pits. All excavation along the line must be barricaded and deep excavation signs and topsoil sign must be placed.

#### **7.3 Buildings and Structures**

Containers have been established on site by various subcontractors that are being used as offices. Male and female ablution facilities have been provided. Chemical toilets and a conservancy tank are used to manage sewer onsite.

### **8 SOCIAL RESPONSIBILITY**

Any complaints from the public are to be recorded on complaints register maintained by the Contractor whose responsibility it is to track and resolve the complaints/issues that are raised. In addition, a box for receiving internal grievances is present at the main site office facility which allows for project staff to bring to the attention of the project management team any comments and or concerns.

## 9 ENVIRONMENTAL AWARENESS AND TRAINING

The contractor has undertaken Toolbox talks for the month of September 2025 covering the following topics:

- Topsoil Management
- Housekeeping
- Snakes onsite
- Environmental Authorisation
- Waste management
- Chemical storage onsite
- No use of danger tape onsite

## 10 HERITAGE

In the event of any unknown artefacts being uncovered during construction, the ESCO and Project Manager must be informed immediately who must then instruct work to be stopped in the immediate area and then promptly report the discovery/finding to the ECO, a heritage specialist and the relevant heritage authority to investigate and confirm if such discovery is in fact a heritage artefact of any significance. No activities impacting upon any heritage sites were reported during this reporting period.

## 11 WARNING & NCRS

No NCR reports were issued by the ECO in the month of September 2025.

## 12 REHABILITATION

No rehabilitation works have commenced during this period, further rehabilitation is expected to occur on the project as and when other works have been completed.



## 13 INCIDENTS AND ACCIDENTS

All environmental related events, incidents and accidents are to be reported directly to the ECO and kept on a central register and included in the monthly report. No environmental incidents that are reportable under Section 30 of the NEMA occurred in September 2025. A register of environmental incidents is attached as **Annexure C**.

## 14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 30<sup>th</sup> of September 2025 with observations documented in this report. Monthly ECO compliance reports are submitted to the Department (DFFE) by the ECO.

## 15 AUDIT METHODOLOGY

This section provides an overview of the methods employed in making observations and providing recommendations and conclusions derived from the audit procedures undertaken.

### 15.1 Audit Process

The site visit, data reviews and report drafting were undertaken by the ECO/auditor. The audit included the following procedures:

- **Site Inspections.** The areas and aspects covered during the inspections with concurrent discussions with the ESCO and site-based representatives of the EA holder included *inter alia*:
  - i. Access control to the sites.
  - ii. Ecologically sensitive areas, where applicable.
  - iii. Waste management.
  - iv. Incident and complaints management.
  - v. Landowner relations.
  - vi. Infrastructure management.
  - vii. Environmental Awareness.
  - viii. Record-keeping and document control.
  - ix. Stormwater and Erosion management
- **Documentation review.** This included:
  - i. A review of the EAs, EMPs and where applicable, method statements.
  - ii. A review of previous audit reports, records, observations, and findings.
  - iii. A review of any remedial and/or protective measures implemented.
  - iv. Identification, if applicable, any gaps requiring action and/or rectification.
- **Audit Report compilation.** This included:
  - i. Recording any observations and findings identified during the audit.
  - ii. Providing recommendations relating to improvement or non-compliance, if and where applicable.

## 15.2 Observation and Recommendation Determination

Observations and subsequent recommendations were based on and are limited to the following:

- i. Available documentation and records viewed or received prior, subsequent, or during the site visit.
- ii. Observations made during the period that the ECO/auditor was on site; and
- iii. Information received from both direct and cross-referenced discussions with permanent site-based staff.

## 15.3 Findings

Any key findings highlighted in this report will indicate areas and/or aspects that require improvement or rectification. The purpose of summarising the findings is to allow the EA holder to identify common management challenges that effect the level of compliance to the conditions of the EAs and EMPrs.

Where findings and recommendations pertaining are deemed significant through compliance status or performance, they are documented as specific issues in the report. All site-specific observations are recorded in the corresponding audit checklist tables.

## 15.4 Audit Tables and Compliance Ratings

The audit table captures observations and recommendations made in relation to the conditions stipulated in the EAs and EMPrs. It provides the reader with more detailed information in terms of what the stipulated requirements are in relation to the organisation's assessed current compliance status, according to the observations recorded by the auditor.

Ratings are calculated based on a scoring system whereby each auditable condition is provided with a score as highlighted in **Table 4** below.

**Table 4:** Compliance rating and scoring.

| Status                              | Compliance Rating |         | Description                                                                                                                                                                                |
|-------------------------------------|-------------------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | Abbreviation      | Scoring |                                                                                                                                                                                            |
| <i>Compliant</i>                    | C                 | 2       | <i>No improvements required</i>                                                                                                                                                            |
| <i>Partially Compliant</i>          | PC                | 1       | <i>Minor improvements required</i>                                                                                                                                                         |
| <i>Non-Compliant</i>                | NC                | 0       | <i>Major improvements required</i>                                                                                                                                                         |
| <i>Work in Progress</i>             | WiP               | -       | <i>Environmental management measures are underway but not yet fully implemented or verified, requiring further monitoring and assessment.</i>                                              |
| <i>Not Applicable / Not Audited</i> | NA                | -       | <i>No improvements required and / or the condition is either not, not yet or no longer relevant at the time of the audit</i>                                                               |
| <i>Informative</i>                  | info              | -       | <i>These relate to informative elements that provide either useful information or are descriptive in the explanation and understanding of statements or concepts in the audit criteria</i> |

Each condition has been ascribed a colour-coded status indicator of Compliant (green), Partially Compliant (orange), major-compliant (red), Not Auditable/Audited (grey), Work in Progress (light red) and Informative (blank/white) to assist the reader in determining aspects that require attention to improve on compliance achieved, if and where applicable. No compliance scoring is attributed any of the audit criteria information pertaining to the following three audit status symbols, namely 'NA', 'WiP', and 'info' as they were either not auditable and/or were not applicable/relevant at the time the audit was undertaken. In other words, they are excluded from the overall compliance rating calculations.

An overall compliance rating is calculated as a percentage to provide the reader with an overview of compliance to the relevant audit criteria however each condition should be considered on its own merits as the ratings do not necessarily portray the severity or impact of the reported finding relating to a condition.

## 16 ASSUMPTIONS AND LIMITATIONS

The ECO compliance audit and associated report are based upon the assumptions that:

- i. Documentation provided to the ECO/auditor is factual and true.
- ii. The audit is based purely on the conditions as stipulated in the EAs and EMPs.
- iii. The construction phase is currently underway and operational phase activities are not applicable.
- iv. Documentation / reports were randomly sampled / reviewed in order to accommodate time constraints.
- v. Where visual observations were not possible either due to physical access constraints or safety constraints, the ECO/auditor used other means to determine compliance, either through requesting written evidence provided by contractors / service providers who service the site or via interviews with technical site-based staff.

## 17 CONSULTATION PROCESS

The approach of consultation followed during the environmental audit was based on written (email) and telephonic correspondence between the ECO/auditor and the Environmental Site Compliance Officer which also includes consultation and communication with the EA holder and competent authority in terms of report submission.

## 18 FINDINGS

Findings are listed in the attached checklists, and it should be noted that findings should be considered individually in the context of the full audit and each condition and associated rating.

The following findings were noted onsite:

- Alien vegetation was observed on stockpiles.
- All excavated pits are secured with barricade nets.
- Some OHPL points are not located on the same coordinates as on the Environmental Authorisation. These points are however located as per the approved Final Layout.
- Groundwater has been encountered during monopole excavations.
- Some excavations were observed to have no deep excavation and topsoil signage.
- No barricading has been erected for the no-go areas by the wetland at tower 13.
- Water ponding and erosion were observed on the access roads,
- Large quantities pallets and plastic straps of found at the waste area.
- Container for casting concrete block accumulated rainwater.
- The bund at the waste area was leaking.
- Machinery standing with on drip trays.
- Chemical bund accumulated rainwater due to no drainage.

Based on the outcomes of the audit it was established that the objectives of the EAs and EMPs were achieved in terms of:

- Sufficiently providing for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis.*
- Ensuring compliance with the provisions of environmental authorisation and EMPs.*

### 18.1 Minor improvements required.

- Emptying the concrete casting container.
- Resealing the edges of the bund to prevent wastewater from contaminating the soil.
- Use drip trays on all standing equipment.

## **18.2 Major improvements required.**

- Clearance of alien vegetation must be done on all affected areas.
- A barricading net must be placed to demarcate the no-go areas at the wetland area.
- Road maintenance must be done.
- Groundwater must be pumped out before excavations are refilled.
- Waste must be removed more frequently onsite.
- Install draining systems and oil separators on the chemical bunds.

## 19 AUDIT SUMMARY

In terms of the findings and results of the **September 2025** ECO audit, the project achieved an overall **99%** compliance rating with the conditions of the EAs and EMPs.

**Table 5: Compliance Scoring**

| No.                                       | Audit criteria                                                                                             | Compliant (C) | Partially Compliant (PC) | Major-non-Compliant (NC) | Work in Progress | Normative (info) | Not Applicable / Not Audited (NA) | Percentage Score      |
|-------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------|--------------------------|--------------------------|------------------|------------------|-----------------------------------|-----------------------|
| 1                                         | Environmental Authorisation for Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)                | 24            | 0                        | 0                        | 1                | 18               | 3                                 | 100%                  |
| 2                                         | Environmental Authorisation for Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2) | 25            | 1                        | 0                        | 1                | 19               | 3                                 | 98%                   |
| 3                                         | EMPr Virginia Solar Park OHPL (DFFE REF NO: 14/12/16/3/3/1/2444)                                           | 215           | 8                        | 1                        | 0                | 46               | 58                                | 98%                   |
| 4                                         | EMPr Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2)                            | 176           | 1                        | 1                        | 0                | 22               | 27                                | 99%                   |
| Overall total no. conditions              |                                                                                                            | 440           | 10                       | 2                        | 2                | 105              | 91                                |                       |
| Audited conditions                        |                                                                                                            | 880           | 12                       | 0                        | 0                | -                | -                                 | (Potential max score) |
| Overall Compliance Rating Calculation (%) |                                                                                                            | 99%           |                          |                          |                  |                  |                                   |                       |



## 20 RECOMMENDATIONS

**Based on the findings identified the following is recommended:**

- Barricade the no-go area ( wetland) at tower number 13 with a barricade net to demarcate the boundaries of the sensitive sites . Only a no-go sign has been placed.
- Pits with ground water must be barricaded with temporary fence to prevent animals from drowning.
- Alien vegetation clearance must continue onsite, and the contractor must monitor the cleared areas to prevent reestablishment of alien vegetation.
- When groundwater is encountered it must be pumped out before concrete is poured.
- Roads must be maintained to correct the effects of erosion and water ponding.
- Stormwater measures must be implemented, measures to be implemented must align with the current conditions onsite.
- Wastewater in the concrete casting container must be disposed of as hazardous waste.
- Drip trays must be used on all standing equipment including trucks waiting to be onboarded.
- The edges of the bund must be resealed to prevent wastewater from contaminating the soil.
- Waste must be removed from the waste area more frequently to prevent overstocking the waste area.

## 21 CONCLUSION

The contractor must ensure that systems and resources to monitor and manage environmental risks and impacts adequately are in place. Resources and personnel to train employees on the contents of the EMPs must be made to ensure that the project runs effectively and efficiently with minimal impact to the biophysical and socio-economic environment.

In general, the EMPs are effective in their current format in terms of content and relevance and there are no major shortcomings. The EMP's sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with this project.

**PREPARED BY:**

A handwritten signature in black ink, appearing to read 'Sakaunda'.

**Sakaunda Jennipher**

Environmental Control Officer

NCC Operations (Pty) Ltd

**M** -069 510 7630

**E** - [jenniphers@ncc-group.co.za](mailto:jenniphers@ncc-group.co.za)

**REVIEWED BY:**

A handwritten signature in black ink, appearing to read 'Nick Gates'.

**Nick Gates**

Senior Environmental Consultant

NCC Operations (Pty) Ltd

**M** -073 1998 431

**E** - [nickg@ncc-group.co.za](mailto:nickg@ncc-group.co.za)

## ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

### Open Concerns/Complaint

| No | Observation date | Concern/Complaint | Suggested Due Date <sup>1</sup> | Proposed Corrective Action | Status | Closure status |
|----|------------------|-------------------|---------------------------------|----------------------------|--------|----------------|
|    |                  |                   |                                 |                            |        |                |

*\*The concerns register is updated once the ECO is present on site.*

### Closed Concerns

| No | Observation date | Concern/Complaint | Due Date suggested by ECO | Corrective Action Taken | Outcome | Closure status |
|----|------------------|-------------------|---------------------------|-------------------------|---------|----------------|
|    |                  |                   |                           |                         |         |                |
|    |                  |                   |                           |                         |         |                |

## ANNEXURE B - NCR REGISTER

| Ref No. | Originator | Dated Issued | Description | Proposed Corrective Action | Closure Status | Closure Date | Further Action Required |
|---------|------------|--------------|-------------|----------------------------|----------------|--------------|-------------------------|
|         |            |              |             |                            |                |              |                         |

## ANNEXURE C - INCIDENT REGISTER

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                       | Volume                                         | Remedial Action                                              |                                                                                 |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|--------------------------------------------------------------|---------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                                                 |                                                | Immediate<br>Corrective<br>Actions                           | Preventative<br>measures                                                        |
| 20/03/2025 | Waste water                                                                                     | Soil pollution                                                                               | On 20, 2025, at approximately 8:28, the conservancy tank being used to collect wastewater from conservancy tank had overfilled, and a Spillage had occurred spillage of approximately 8-10 litres of wastewater mixed with the cleaning material. the toilet supplier attended to the spill immediate & initiated spill Clean-up. Contaminated soil was taken to the hazardous waste skip.    | 10 l<br>(below<br>Section<br>30<br>threshold ) | Clean- up must be done as soon as the spills are identified. | The conservancy tank must be emptied more frequently to reduce overfilling.     |
| 19/03/2025 | Waste water                                                                                     | Soil pollution                                                                               | Approximately 12 litres of wastewater mixed with the cleaning chemicals where toilets are located. The toilet had been leaking since the previous day and wastewater was contained in a drip tray. The toilet supplier was notified, and he came to service<br><br>The toilets; however, during servicing; the drip tray spilled over causing the spillage of the wastewater onto the ground. | 12l<br>(below<br>Section<br>30<br>threshold )  | Clean- up must be done as soon as the spills are identified. | Leaking toilets must not be allowed onsite.                                     |
| 08/03/2025 | Diesel spillage                                                                                 | Soil pollution                                                                               | On 08 March 2025 at 05:30, security supervisor discovered a diesel leakage during the morning patrol. The spillage occurred due to the diesel injectors that were                                                                                                                                                                                                                             | 20l<br>(below<br>Section<br>30<br>threshold )  | Clean- up must be done as soon as the spills are identified  | Vehicles must be maintained regular . only road worthy vehicles must be onsite. |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                 | Volume                                            | Remedial Action                                             |                                                                                |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                           |                                                   | Immediate<br>Corrective<br>Actions                          | Preventative<br>measures                                                       |
|            |                                                                                                 |                                                                                              | loose one of them was not properly fitted and diesel pressure removed them while the bakkie was in motion.                                                                                                                                                                                                                                                              |                                                   |                                                             |                                                                                |
| 07/03/2025 | Water and antifreeze                                                                            | Soil pollution                                                                               | The Driver parked the minibus on site, shortly a leak observed containing a mixture of water and antifreeze, while also exhibiting signs of overheating.                                                                                                                                                                                                                | -                                                 | Clean- up must be done as soon as the spills are identified | Vehicles must be maintained regular. only road worthy vehicles must be onsite. |
| 06/05/2025 | Water mixed with antifreeze spillage                                                            | Soil pollution                                                                               | On 6 May 2025 at 14:00, the TLB Operator was busy moving spoil material near the access road to the allocated spoil Stockpile area, when the TLB, radiator fan belt snapped & the container that stores water & antifreeze busted. Approximately 5 Liters of water with antifreeze spilled                                                                              | 5 litres<br>(below<br>Section<br>30<br>threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.                  |
| 08/05/2025 | Toilet Cleaner mixed with water spillage                                                        | Soil pollution                                                                               | A chemical toilet in PV3 at the laydown area at around 3:53 pm, 08 May 2025 was reported to be leaking, when the toilet was assessed, it was identified that there was a broken pipe that leaked the chemical water. An immediate action was taken to clean up the spillage. The contaminated soil was collected into the bags and taken to site waste management area. | 6 litres<br>(below<br>Section<br>30<br>threshold) | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent.         |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                   | Volume                                   | Remedial Action                                             |                                                                        |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                |                                          | Immediate Corrective Actions                                | Preventative measures                                                  |
| 12/05/2025 | Diesel spillage                                                                  | Soil pollution                                                             | On 12-05-2025 at 06:40, the ambulance was on the way to the access control point along the main access road, when it had a sudden breakdown and diesel was spilled along the access road, leaving a trail of diesel spill for approximately +400 Metres. Approximately +2 Litres of diesel was spilled                                                                                                                                                    | 2 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.          |
| 15/05/2025 | Hydraulic oil spillage                                                           | Soil pollution                                                             | On the 15/05/2025, a side tipper truck was transporting spoil material when the cylinder failed and spilled ~7 litres of hydraulic oil, about 455m from the nearest watercourse. The contaminated soil was promptly cleaned up.                                                                                                                                                                                                                           | 7 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.          |
| 20/05/2025 | Toilet Cleaner mixed with water spillage                                         | soil pollution                                                             | It was around 11:30 am when it was reported that there was a spillage, that when the Fidamo team was about to clean the toilets at Pv1 Laydown area, a pipe from the generator busted and the water leaked from the broken pipe. The water that spilled was approximately 3-4 Liters and the pipe was immediately stopped. The chemical that was in the water is blue splash Toilet chemical. An immediate action was taken to clean up the spillage. The | 4 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                 | Volume                                                                 | Remedial Action                                                                                            |                                                                                                               |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                              |                                                                        | Immediate Corrective Actions                                                                               | Preventative measures                                                                                         |
|            |                                                                                  |                                                                            | contaminated soil was collected into the bags and taken to site waste management area.                                                                                                                                                                                                                                                                                                                                  |                                                                        |                                                                                                            |                                                                                                               |
| 21/05/2025 | Fauna                                                                            | Loss of biodiversity                                                       | On the 21/05/2025 a snake was fatally wounded during the internal road construction works.                                                                                                                                                                                                                                                                                                                              | N/A                                                                    | The dead animal was buried.                                                                                | N/A                                                                                                           |
| 26/05/2025 | Hydraulic oil spillage                                                           | Soil pollution                                                             | On 26/05/2025, at around 16:50 a drill rig operator noticed a leak from the machine, he immediately reported the leak to the supervisor. The supervisor called the mechanic but did not report the spillage. The oil further spilled to the soil during the repair attempts which were done under poor lighting. The spillage was left overnight and was only reported to the EO the next morning when the shift began. | 25 litres<br>(below Section 30 threshold)                              | Clean- up must be done as soon as the spills are identified.                                               | The ESCO issued NCR to the subcontractor for failing to report spillage immediately.                          |
| 11/06/2025 | Concrete and oil Spillage                                                        | Soil pollution                                                             | On the 11 <sup>th</sup> of June 2025 the concrete mixer truck overturned resulting in the spillage of an estimated 3m3 (3 cubic meters) of concrete and approximately 8litres of diesel. The contractor removed the spilled concrete and dumped it on the natural area adjacent to the road                                                                                                                             | 8 litres of diesel and 3m3 of concrete<br>(below Section 30 threshold) | Clean- up must be done as soon as possible and an investigation must be done on the cause of the accident. | The ESCO issued an NCR to the subcontractor for failing to report dumping concrete on the natural vegetation. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                             | Volume                                 | Remedial Action                                                                                     |                                                                                                  |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|-----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                          |                                        | Immediate Corrective Actions                                                                        | Preventative measures                                                                            |
| 16/06/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | At 08:32am, on the 16th of June 2025, The Client (Robin) reported that ABLON's Ablution facilities were leaking which resulted to soil contamination, we immediately stopped everyone from using the Toilet and reported the issue to our service provider. A drip tray was placed immediately underneath the toilet. The event occurred at the OHL Site Camp and the name of the chemical that spilled on the ground is Portabloo Toilet Chemical. | 30 litres (below Section 30 threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 24/06/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | At around 8 am on the 24/06/2025 a spillage was reported by the contractor. Approximately 30 litres of Toilet Blue was spilled at the Virginia 1 laydown area. The spillage was cleaned up and the contaminated soil removed for disposal.                                                                                                                                                                                                          | 30 litres (below Section 30 threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 08/07/2025 | Hydraulic Oil Spillage                                                           | Soil pollution                                                             | A tipper truck spilled some hydraulic oil when the driver was offloading some excavated material at PV2 I8 road on the 08h of July 2025. The driver lifted the truck to off load the material when it was half way up, he discovered that the body of the truck was swinging to the sides and he tried to stop, and discovered some oil                                                                                                             | 30 litres (below Section 30 threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | Vehicles that are constantly breaking down must be moved off site.                               |



| Date | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                        | Volume | Remedial Action                    |                          |
|------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|------------------------------------|--------------------------|
|      | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                  |        | Immediate<br>Corrective<br>Actions | Preventative<br>measures |
|      |                                                                                                 |                                                                                              | leaks from the hydraulic cylinder, about +-9 litres of oil spilled to the ground and it was reported to the EO, immediately the supervisor and the driver cleaned the spillage and the contaminated soil was collected into bags and taken to ABC Solar Waste management area. |        |                                    |                          |

## **ANNEXURE D – PHOTOGRAPHS**



**Figure 1:** Sensitive areas that must be demarcated.



**Figure 2:** Alien vegetation on stockpiles.



**Figure 3:** Torn barricade must be recycled.



**Figure 4:** Water ponding on the laydown area.





**Figure 5:** Groundwater being pumped out of excavations.



**Figure 6:** Pylons (material) onsite.





**Figure 7:** Concrete must be disposed correctly.



**Figure 8:** Wastewater in the concrete casting container must be disposed correctly.



**Figure 9:** Trucks with on drip trays.



**Figure 10:** Leaking waste bund

**THIS PAGE WAS INTENTIONALLY LEFT BLANK**





---

# ECO MONTHLY ENVIRONMENTAL MONITORING REPORT

Virginia Photo Voltaic (PV) Solar Facility 1, 2 and 3,  
Matjhabeng, Lejweleputswa District Municipality within  
the jurisdiction of the Free State Province.

---

**PREPARED FOR:**

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

Department of Forestry, Fisheries, and the Environment: Compliance Monitoring

**DATED:**

September 2025

**PREPARED BY:**

NCC Operations

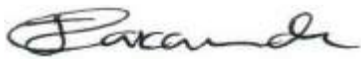
**T** • 021 702 2884

**E** • [info@ncc-group.co.za](mailto:info@ncc-group.co.za)

## DECLARATION OF INDEPENDENCE

I, Jennipher Sakaunda, as duly authorised representative of NCC Operations (Pty) Ltd ("**NCC**"), hereby confirm my independence (as well as that of NCC) as an auditor and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which URSA Energy (Pty) Ltd has appointed NCC as Environmental Control Officer ("**ECO**"), other than fair remuneration for work performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'Sakaunda', is positioned below the 'Signed:' text.

**Jennipher Sakaunda**

03 October 2025

Environmental Control Officer

NCC Operations (Pty) Ltd

## **LIABILITY DISCLAIMER AND CONFIDENTIALITY CLAUSE**

All inspections conducted, as well as reports and recommendations provided by NCC are purely advisory. They are primarily intended for the purpose of assisting clients in loss control, risk management as well as health, safety, and environmental procedures.

Observations and recommendations are the result of practices and conditions observed, and information made available to us in various forms at the time of our visit. They do not purport to refer to or guarantee compliance with local or government regulations which may be applicable to such practices and conditions. This report should not be considered a definitive listing of all existing risks nor an absolute solution to all indicated risks, or hazards present from time to time in the Client Organisation. The report should always be considered in its entirety; individual sentences, paragraphs or sections of the report should not be used in isolation.

This report should not be reproduced except in its entirety, including this liability disclaimer or contents reproduced or disclosed to any third party without the prior written approval of NCC.

NCC assumes no responsibility for any losses incurred as a result of the implementation, management, and operation of recommended health, safety and environmental systems, processes and procedures.

## DOCUMENT CONTROL

|                     |                                             |
|---------------------|---------------------------------------------|
| <b>REPORT TITLE</b> | Monthly ECO Environmental Monitoring Report |
| <b>PROJECT</b>      | Virginia Solar PV 1, 2, 3                   |
| <b>LOCATION</b>     | Free State Province                         |
| <b>EA HOLDER</b>    | URSA Energy (Pty) Ltd                       |
| <b>ECO</b>          | NCC Operations (Pty) Ltd                    |
| <b>REVISION</b>     | 00                                          |
| <b>DATE</b>         | 03/10/2025                                  |

| Revision | Date       | Description                  |
|----------|------------|------------------------------|
| Rev 00   | 03/10/2025 | First Draft - Internal       |
| Rev 01   | TBC        | Final - Authority submission |

## REPORT DISTRIBUTION LIST

| Name                   | Organisation                      | Issued     | Format     |
|------------------------|-----------------------------------|------------|------------|
| Janine Brasington      | Red Rocket South Africa (Pty) Ltd | 03/10/2025 | Electronic |
| Serina Pillay          | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Maggie Logan           | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Director of Compliance | DFFE                              | TBC        | Electronic |

## TABLE OF CONTENTS

|                                                    |           |
|----------------------------------------------------|-----------|
| <b>TABLE OF FIGURES .....</b>                      | <b>7</b>  |
| <b>ABBREVIATIONS .....</b>                         | <b>8</b>  |
| <b>1 INTRODUCTION .....</b>                        | <b>9</b>  |
| 1.1 Background.....                                | 9         |
| 1.2 Audit Scope and Purpose.....                   | 11        |
| 1.3 Monitoring Frequency and Reporting.....        | 11        |
| <b>2 AUDITOR BACKGROUND. ....</b>                  | <b>12</b> |
| <b>3 GENERAL (NOTABLE EVENTS) .....</b>            | <b>13</b> |
| 3.1 General Outstanding matters.....               | 13        |
| 3.2 Audits (Internal and External).....            | 13        |
| <b>4 WASTE MANAGEMENT.....</b>                     | <b>14</b> |
| 4.1 Domestic/ General Waste.....                   | 14        |
| 4.2 Hazardous waste.....                           | 14        |
| 4.3 Wastewater .....                               | 15        |
| <b>5 PROTECTIVE MEASURES .....</b>                 | <b>15</b> |
| 5.1 General .....                                  | 15        |
| <b>6 ENVIRONMENTAL CONSERVATION.....</b>           | <b>16</b> |
| 6.1 Conservation of Flora and Fauna.....           | 16        |
| 6.2 Water Management.....                          | 16        |
| 6.3 Soil Management .....                          | 16        |
| 6.4 Stormwater and Erosion onsite .....            | 16        |
| <b>7 INFRASTRUCTURE MANAGEMENT.....</b>            | <b>17</b> |
| 7.1 Access Roads.....                              | 17        |
| 7.2 Fences, Gates, and Barricading .....           | 17        |
| 7.3 Buildings and Structures .....                 | 17        |
| <b>8 SOCIAL RESPONSIBILITY.....</b>                | <b>17</b> |
| <b>9 ENVIRONMENTAL AWARENESS AND TRAINING.....</b> | <b>18</b> |
| <b>10 HERITAGE.....</b>                            | <b>18</b> |
| <b>11 WARNING &amp; NCRS.....</b>                  | <b>18</b> |

|           |                                                        |           |
|-----------|--------------------------------------------------------|-----------|
| <b>12</b> | <b>REHABILITATION .....</b>                            | <b>18</b> |
| <b>13</b> | <b>INCIDENTS AND ACCIDENTS .....</b>                   | <b>19</b> |
| <b>14</b> | <b>MEETINGS AND OTHER CORRESPONDANCE.....</b>          | <b>19</b> |
| <b>15</b> | <b>AUDIT METHODOLOGY.....</b>                          | <b>20</b> |
| 15.1      | Audit Process.....                                     | 20        |
| 15.2      | Observation and Recommendation Determination.....      | 21        |
| 15.3      | Findings.....                                          | 21        |
| 15.4      | Audit Tables and Compliance Ratings .....              | 21        |
| <b>16</b> | <b>ASSUMPTIONS AND LIMITATIONS .....</b>               | <b>23</b> |
| <b>17</b> | <b>CONSULTATION PROCESS.....</b>                       | <b>23</b> |
| <b>18</b> | <b>FINDINGS .....</b>                                  | <b>24</b> |
| 18.1      | Minor improvements required. ....                      | 24        |
| 18.2      | Major improvements required.....                       | 25        |
| <b>19</b> | <b>AUDIT SUMMARY.....</b>                              | <b>26</b> |
| <b>20</b> | <b>. RECOMMENDATIONS .....</b>                         | <b>27</b> |
| <b>21</b> | <b>CONCLUSION.....</b>                                 | <b>27</b> |
|           | <b>ANNEXURE A – CONCERNS/COMPLAINTS REGISTER .....</b> | <b>29</b> |
|           | <b>ANNEXURE B - NCR REGISTER .....</b>                 | <b>29</b> |
|           | <b>ANNEXURE C - INCIDENT REGISTER.....</b>             | <b>30</b> |
|           | <b>ANNEXURE D – PHOTOGRAPHS .....</b>                  | <b>36</b> |

## TABLE OF FIGURES

|                                                                   |    |
|-------------------------------------------------------------------|----|
| Figure 1: Cleared alien vegetation boing moved by stormwater..... | 37 |
| Figure 2: Sign of Erosion and water ponding onsite. ....          | 37 |
| Figure 3: Unbarricaded trenches with water.....                   | 38 |
| Figure 4: Small oil spillage.....                                 | 38 |
| Figure 5: Large pile wood pallets.....                            | 39 |
| Figure 6: Cattle in the construction area.....                    | 39 |
| Figure 7: Chemical bund accumulating rainwater .....              | 40 |
| Figure 8: Drip Trays with water .....                             | 40 |
| Figure 9: Alien vegetation site. ....                             | 41 |
| Figure 10: Condition of the access road.....                      | 41 |
| Figure 11: Equipment with on drip trays.....                      | 42 |
| Figure 12: Leaking waste bund.....                                | 42 |

## ABBREVIATIONS

|             |                                                         |
|-------------|---------------------------------------------------------|
| <b>BAR</b>  | Basic Assessment Report                                 |
| <b>CA</b>   | Competent Authority                                     |
| <b>DEA</b>  | Department of Environmental Affairs (now DFFE)          |
| <b>DFFE</b> | Department of Forestry, Fisheries, and the Environment  |
| <b>DWS</b>  | Department of Water and Sanitation                      |
| <b>EA</b>   | Environmental Authorisation                             |
| <b>EAP</b>  | Environmental Assessment Practitioner                   |
| <b>ECO</b>  | Environmental Control Officer                           |
| <b>EIA</b>  | Environmental Impact Assessment                         |
| <b>EMPr</b> | Environmental Management Programme                      |
| <b>EO</b>   | Environmental Officer (Contractor)                      |
| <b>ER</b>   | Employer's Representative                               |
| <b>ESCO</b> | Environmental Site Compliance Officer                   |
| <b>kV</b>   | Kilovolt                                                |
| <b>MVA</b>  | Megavolt Amperes                                        |
| <b>MW</b>   | Megawatt                                                |
| <b>NCC</b>  | NCC Operations                                          |
| <b>NCR</b>  | Non-Compliance Report                                   |
| <b>NEMA</b> | National Environmental Management Act (No. 107 of 1998) |
| <b>NWA</b>  | National Water Act (No. 36 of 1998)                     |
| <b>OHPL</b> | Overhead Power Line                                     |
| <b>SDC</b>  | Safe Disposal Certificate                               |
| <b>SHE</b>  | Safety, Health, and Environment                         |
| <b>SS</b>   | Substation                                              |
| <b>TBC</b>  | To Be Confirmed                                         |



# 1 INTRODUCTION

## 1.1 Background

NCC Operations (Pty) Ltd ("**NCC**") was appointed by URSA Energy (Pty) LTD ("**URSA**") to provide a suitably experienced independent Environmental Control Officer ("**ECO**") for the construction phase of Virginia Solar Park which will be connected to the Eskom Theseus Main Transmission Substation (MTS). The site is located on Farm Blomskraal 216, Ventersburg RD located within the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province. On completion the facility will consist of the Photovoltaic (PV) Power Plant with a maximum generation capacity up to 100 MW, a 132kV powerline connecting the substation to the Eskom Theseus substation which is located 16.2 km North-East of the north-western corner of project site.

The ECO has the responsibility of ensuring the mitigation/ rehabilitation measures and conditions referred to in the Environmental Authorisation ("**EA**") are implemented, as well as ensuring compliance with the requirements of the Environmental Management Programme ("**EMPr**"). This report provides an insight into the overall compliance performance and a summary of other environmental concerns and potential environmental risks through observations during site inspections.

This report is based on the following environmental conditions or requirements:

- a) Environmental Authorisations (EA)
  - 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
  - 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
  - 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)
- b) Environmental Management Programmes (EMPr)
- c) Relevant environmental legislation.
- d) All other environmental permits, licenses, and authorisations.

The notification of commencement of construction was submitted to the DFFE for Virginia Solar Plant (Pty) Ltd on the 02 May 2024.

This report addresses conditions set out in the EA which states the ECO as part of their duties: "*The ECO must keep record of all activities on site, problems identified, transgressions noted, and a task schedule of tasks undertaken by the ECO.*" As per the roles and responsibilities in the Virginia Solar Project ("**VSP**") EMPr, the primary role of the ECO will be to monitor the construction activities and ensure that the mitigation measures

of the EMPr and Environmental Authorisations (EA) are implemented. This report also includes an audit checklist for the VSP EA as follows:

- 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
- 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
- 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)

A summary of the various environmental requirements i.e. the audit criteria relating to the overall project is provided in **Table 1**.

**Table 1:** Summary of environmental requirements / criteria relating to the overall project.

| Components of overall project | Environmental requirements / criteria |               |                                |              |
|-------------------------------|---------------------------------------|---------------|--------------------------------|--------------|
|                               | DFFE EA Ref No.                       | Issue date    | Approved EMPr<br>(Compiled by) | Date         |
| Virginia 1 Solar Park         | 14/12/16/3/3/2/2099/1                 | 20 April 2022 | Terramanzi Group (Pty) Ltd     | October 2023 |
| Virginia 2 Solar Park         | 14/12/16/3/3/2/2100                   | 20 May 2022   | Terramanzi Group (Pty) Ltd     | October 2023 |
| Virginia 3 Solar Park         | 14/12/16/3/3/2/2101                   | 20 April 2022 | Terramanzi Group (Pty) Ltd     | October 2023 |

This report represents the monitoring for the Construction Phase. The responsibility of enforcement of the conditions of the EAs and EMPrs lies with the Project and Project Manager, while the Department of Forestry, Fisheries, and the Environment (“DFFE”) Environmental Management Inspectorate (“EMI”) may also enforce existing and potentially new conditions through compliance notices.

An Environmental Site Compliance Officer (“ESCO”) has been appointed by the holder of the EA to monitor the project compliance onsite on a full-time basis on behalf of the EA holder. The responsibilities of the ESCO includes:

- Monitoring conditions of the Basic Assessment Reports (“BARs”), Environmental Impact Report (EIR) EAs and the EMPrs.
- Ensuring compliance with all relevant environmental legislation.

- Approving method statements (reviewed by the ECO and co-approved by Site Manager).
- Remaining employed until the completion of the construction activities.
- Reporting to the Project Manager, including all findings identified onsite.
- Reporting any significant findings to the ECO.
- Preparing and submitting monthly reports to the ECO and Project Manager.
- Monitoring compliance by the Contractor.

In addition, the ESCO will:

- Undertake daily inspections of the site and surrounding areas.
- Audit compliance with the EMPr and conditions of the environmental authorisation.
- Take appropriate action if the specifications contained in the EMPr and conditions of the environmental authorisation are not followed.
- Monitor and verify that environmental impacts are kept to a minimum, as far as possible; and
- Ensure that activities onsite comply with all relevant environmental legislation.

## 1.2 Audit Scope and Purpose.

In accordance with Regulation 34 of the 2014 NEMA EIA Regulations (as amended) the holder of an environmental authorisation must, for the period during which the EA and EMPr, and where applicable the closure plan, remain valid —

- Ensure that the compliance with the conditions of the EA and the EMPr, and where applicable the closure plan, is audited; and*
- Submit an environmental audit report to the relevant competent authority.*

The purpose of this environmental audit is to verify compliance to the overarching environmental requirements specified as conditions of the EAs and EMPrs, and report on the extent to which the objectives of the EMPrs and are being achieved.

## 1.3 Monitoring Frequency and Reporting.

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 30<sup>th</sup> of September 2025 after which this report was compiled which serves to document and audit. This report covers the monthly reporting for the month of September 2025.

## 2 AUDITOR BACKGROUND.

NCC is a multi-disciplinary environmental consulting company based in South Africa which adopts a 'values driven' approach with a common purpose to conserve and create sustainable environments that enable people, planet and business to thrive. We are a trusted partner to major engineering and construction firms, mines, parastatals, film, sports and event production companies, municipalities, provincial and national government, and conservation organisations. Drawing on our years of experience on a wide range of projects, NCC works with our clients to develop, implement, and monitor customised services that add real value.

The auditor, **Jennipher Sakaunda**, is a senior environmental manager with more than 14 years' experience currently employed with NCC. Jennipher Sakaunda has experience in several environmental fields including environmental compliance monitoring and auditing, due diligence assessment, environmental impact and risk assessment, and compilation of environmental management plans/programmes.

**Table 2:** Details of the auditor.

|                       |                                                                                                                                                                                                |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Company</b>        | NCC Operations (Pty) Ltd                                                                                                                                                                       |
| <b>Auditor</b>        | Jennipher Sakaunda                                                                                                                                                                             |
| <b>Tel</b>            | +27 21 702 2884                                                                                                                                                                                |
| <b>Mobile</b>         | +27 69 510 7630                                                                                                                                                                                |
| <b>Email</b>          | <a href="mailto:jenniphers@ncc-group.co.za">jenniphers@ncc-group.co.za</a>                                                                                                                     |
| <b>Address</b>        | 26 Bell Close, Westlake Business Park Westlake, 7945                                                                                                                                           |
| <b>Affiliation</b>    | International Association of Impact Assessment South Africa.<br>Environmental Assessment Practitioner Association of South Africa.<br>South African Council of Natural Scientific Professions. |
| <b>Qualifications</b> | BSc (honors) Environmental Management                                                                                                                                                          |
| <b>Expertise</b>      | A detailed CV can be provided on request.                                                                                                                                                      |

### 3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (September 2025) included the following:

- Construction of the internal road connecting the access road to the Temporary Site Offices (“TSF”) and Switching Station.
- Demobilisation of site offices and laydown area.
- Fencing.
- Clearing and grubbing of PV area and levelling works.
- Drilling and pile installations.
- Reworking of the rain damaged portions of the access road.
- Installation of Solar Panels
- Installation of torque tubes.
- Trench excavation works for cables.

#### 3.1 General Outstanding matters

Any major outstanding matters are to be recorded and summarised in the Concerns Register (**Annexure A**). The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

#### 3.2 Audits (Internal and External)

Internal audits are undertaken monthly by the Red Rocket ESCO. This ECO Audit was undertaken on the 30<sup>th</sup> of September 2025. Audit tables/checklists are attached to this report. The ECO undertakes external monthly audits.

## 4 WASTE MANAGEMENT

The contractor must make provision for waste avoidance, minimisation, and separation of waste where possible through recycling efforts. Waste management awareness must be done on an ongoing basis and must be provided through toolbox talks and awareness posters. A waste station was constructed at V3 where waste is temporarily stored, sorted and recycled. The waste station includes a bund where waste will be stored and various compartments where waste will be sorted into. The contractor is constructing a sump on the waste area where wastewater will collect into. The contractor must ensure that the waste area has a roof to protect waste from weather elements. The bund was observed to be leaking rainwater onto the ground; the area must be resealed. Recyclables are transported to Mpact for recycling. Large quantities of wood pallets and plastic straps were observed onsite. Waste must be removed from site more frequently to ensure adequate storage space.

### 4.1 Domestic/ General Waste

Approximately **295 kg** of general waste, **0.13** tonnes of cleared vegetation and **99 kg** of wooden shipping boxes were removed from site in the month of September 2025. Designated waste areas have been provided at the contractors' main site offices/laydown areas for purposes of temporary storage of waste prior to collection and transferal to the licensed waste facilities. Bins at the laydown area are colour coded for each waste type. The contractor has commenced with taking waste for recycling.

The service providers dispose the general waste at Matjhabeng Local Municipality waste disposal site-Licence number: B33/2/340/21/P8 16/2/7/C404/D2/Z1/P367. Proof of disposal is available on request.

### 4.2 Hazardous waste

Hazardous waste skips are available at the dedicated waste storage area at each of the sub-contractors' site offices/lay down areas. No hazardous waste was disposed of in September 2025. Hazardous waste in form of oil spillages, cement spillages and contaminated soil is kept onsite until there is enough to dispose. . No major spillages have been recorded on site. All standing equipment and trucks must be equipped with drip trays to prevent spillages.

### 4.3 Wastewater

Approximately **42497 L** of sewerage waste was generated on site in the month of September 2025. Chemical toilets and a conservancy tank have been provided onsite. No incidents spillages from the chemical toilets have been recorded this month an improvement from the previous months. The contractor must ensure these chemical toilets are serviced regularly and drip trays are placed under each toilet.

The General Authorisation that was issued by DWS for the includes the use of a conservancy tank up to a capacity of 50 000 L. The conservancy tank onsite has a capacity of 12 500 L which is below the stipulated GA threshold. The contractor must ensure that this capacity is not exceeded.

The Appointed Service Provider removes sewage and disposes of it at Matjhabeng Local Municipality wastewater treatment facility - Licence No: 10/D4/J/G/2082. Proof of disposal is available onsite. The contractor must ensure the appointed service provider is licenced to provide sewer removal services. With the work being spread out the contractor must ensure ablutions are within walking distance within the areas where people are working.

## 5 PROTECTIVE MEASURES

### 5.1 General

Protective measures have been deployed to mitigate environmental impacts or prevent impacts from occurring which includes:

- Security guards are present on the site, with access control in place.
- Induction training is conducted for all persons working and visiting the site.
- Snake gaiters are provided.
- Spill kits are available on site.
- No-go areas are demarcated and provided with signage.
- Access cards are used to enter and exit the site.
- Rapid alcohol detecting is in place.

## 6 ENVIRONMENTAL CONSERVATION

### 6.1 Conservation of Flora and Fauna

A permit to clear the site and relocate species of concern was received from the Free state Department of Economic, Small Business Development, Tourism and Environmental Affairs. The permit with Ref No. 202306000012649 was issued on 08/06/2023 to pluck protected and unprotected flora.

Clearance of alien vegetation is in progress, however the pace at which the contractor is removing alien vegetation is concerning especially with the onset of rains. Additionally, cleared vegetation is being moved by storm water spreading seed to new areas, these must be landfilled. The contractor must monitor the newly cleared areas and areas where alien vegetation was removed to ensure alien vegetation does not re-establish. The contractor must remove the stockpiled alien vegetation to the Matjhabeng Local Municipality for disposal.

Indigenous vegetation reestablishment was noted at solar fields; the flora composition must be recorded and compared with the surrounding areas to establish the rehabilitation measures required.

### 6.2 Water Management

Approximately **386 m<sup>3</sup>** of water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The GA allows for abstraction of 43 000m<sup>3</sup> annually, the contractor must ensure water abstraction does not exceed the licenced volumes. The contractor also abstracted **2218 m<sup>3</sup>** of water from Sluice 16, another licenced source.

### 6.3 Soil Management

Cleared topsoil must be protected from erosion and alien vegetation establishment. Alien vegetation has established on the stockpiles and must be cleared. The contractor has commenced with moving the excess topsoil to an area near the main gate. On PV2 area topsoil was found to be mixed with spoil material and trucks were driving on topsoil which may result in compaction. Stockpiles must be protected from erosion.

### 6.4 Stormwater and Erosion onsite

Although contractor's Stormwater Management Plan was approved and some measures implemented, erosion and water ponding were observed on the road, laydown areas and the solar fields. The SWMP must be assessed to check if it is aligned with the changes onsite.



## **7 INFRASTRUCTURE MANAGEMENT**

### **7.1 Access Roads**

The project team is using existing farm roads for current construction activities until such time as the project access roads and internal roads have been constructed. Since erosion and water ponding were observed contractor must maintain access roads. Maintenance of the access roads must be done on a regular basis.

### **7.2 Fences, Gates, and Barricading**

The site is fenced with security personnel manning the access gates. Access cards are used to allow entrance to site. Barricading was observed on site, and such should continue to be maintained around all open excavations to prevent potential fauna (wildlife and livestock) incidents. The contractor must ensure trenches for cables on are barricaded at the end of each working day. The contractor is advised to work on small sections at a time to ensure that there is enough material to barricade the open trenches. Cattle were observed near the main gate; the contractor must ensure all gates are closed to prevent animals from being hit by the trucks.

### **7.3 Buildings and Structures**

Containers have been established on site by various subcontractors that are being used as offices. Male and female ablation facilities have been provided. Chemical toilets and a conservancy tank are used to manage sewer onsite. The contractor must ensure the bund meets the requirements such as ventilation and capacity as outlined in the EMP. A waste station has been established at V3. The waste station constitutes a bunded areas for the storage of hazardous waste and varies compartments where waste will be segregated into. A sump is under construction to capture wastewater.

## **8 SOCIAL RESPONSIBILITY**

Any complaints from the public are to be recorded on complaints register maintained by the Contractor whose responsibility it is to track and resolve the complaints/issues that are raised. In addition, a box for receiving internal grievances is present at the main site office facility which allows for project staff to bring to the attention of the project management team any comments and or concerns.

## 9 ENVIRONMENTAL AWARENESS AND TRAINING

The contractor has undertaken Toolbox talks for the month of September 2025 covering the following topics:

- Topsoil Management
- Housekeeping
- Snakes onsite
- Environmental Authorisation
- Waste management
- Chemical storage onsite
- No use of danger tape onsite

## 10 HERITAGE

In the event of any unknown artefacts being uncovered during construction, the ESCO and Project Manager must be informed immediately who must then instruct work to be stopped in the immediate area and then promptly report the discovery/finding to the ECO, a heritage specialist and the relevant heritage authority to investigate and confirm if such discovery is in fact a heritage artefact of any significance. No activities impacting upon any heritage sites were reported during this reporting period.

A barricade net was placed around the graves near the main gate to ensure the site is not disturbed by trucks moving excess topsoil.

## 11 WARNING & NCRS

No NCR reports were issued by the ECO in the month of September 2025.

## 12 REHABILITATION

No rehabilitation works have commenced during this period, further rehabilitation is expected to occur on the project as and when other works have been completed.

## 13 INCIDENTS AND ACCIDENTS

All environmental related events, incidents and accidents are to be reported directly to the ECO and kept on a central register and included in the monthly report. No environmental incidents that are reportable under Section 30 of the NEMA occurred in September 2025. A register of environmental incidents is attached as **Annexure C**.

## 14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 30<sup>th</sup> of September 2025 with observations documented in this report. Monthly ECO compliance reports are submitted to the Department (**DFFE**) by the ECO.

## 15 AUDIT METHODOLOGY

This section provides an overview of the methods employed in making observations and providing recommendations and conclusions derived from the audit procedures undertaken.

### 15.1 Audit Process

The site visit, data reviews and report drafting were undertaken by the ECO/auditor. The audit included the following procedures:

- **Site Inspections.** The areas and aspects covered during the inspections with concurrent discussions with the ESCO and site-based representatives of the EA holder included *inter alia*:
  - i. Access control to the sites.
  - ii. Ecologically sensitive areas, where applicable.
  - iii. Waste management.
  - iv. Incident and complaints management.
  - v. Landowner relations.
  - vi. Infrastructure management.
  - vii. Environmental Awareness.
  - viii. Record-keeping and document control.
  - ix. Stormwater and Erosion management
- **Documentation review.** This included:
  - i. A review of the EAs, EMPs and where applicable, method statements.
  - ii. A review of previous audit reports, records, observations, and findings.
  - iii. A review of any remedial and/or protective measures implemented.
  - iv. Identification, if applicable, any gaps requiring action and/or rectification.
- **Audit Report compilation.** This included:
  - i. Recording any observations and findings identified during the audit.
  - ii. Providing recommendations relating to improvement or non-compliance, if and where applicable.

## 15.2 Observation and Recommendation Determination

Observations and subsequent recommendations were based on and are limited to the following:

- i. Available documentation and records viewed or received prior, subsequent, or during the site visit.
- ii. Observations made during the period that the ECO/auditor was on site; and
- iii. Information received from both direct and cross-referenced discussions with permanent site-based staff.

## 15.3 Findings

Any key findings highlighted in this report will indicate areas and/or aspects that require improvement or rectification. The purpose of summarising the findings is to allow the EA holder to identify common management challenges that effect the level of compliance to the conditions of the EAs and EMPs.

Where findings and recommendations pertaining are deemed significant through compliance status or performance, they are documented as specific issues in the report. All site-specific observations are recorded in the corresponding audit checklist tables.

## 15.4 Audit Tables and Compliance Ratings

The audit table captures observations and recommendations made in relation to the conditions stipulated in the EAs and EMPs. It provides the reader with more detailed information in terms of what the stipulated requirements are in relation to the organisation's assessed current compliance status, according to the observations recorded by the auditor.

Ratings are calculated based on a scoring system whereby each auditable condition is provided with a score as highlighted in **Table 3** below.

**Table 4:** Compliance rating and scoring.

| Status                              | Compliance Rating |         | Description                                                                                                                                                                                |
|-------------------------------------|-------------------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | Abbreviation      | Scoring |                                                                                                                                                                                            |
| <i>Compliant</i>                    | C                 | 2       | <i>No improvements required</i>                                                                                                                                                            |
| <i>Partially Compliant</i>          | PC                | 1       | <i>Minor improvements required</i>                                                                                                                                                         |
| <i>Non-Compliant</i>                | NC                | 0       | <i>Major improvements required</i>                                                                                                                                                         |
| <i>Work in Progress</i>             | WiP               | -       | <i>Environmental management measures are underway but not yet fully implemented or verified, requiring further monitoring and assessment.</i>                                              |
| <i>Not Applicable / Not Audited</i> | NA                | -       | <i>No improvements required and / or the condition is either not, not yet or no longer relevant at the time of the audit</i>                                                               |
| <i>Informative</i>                  | info              | -       | <i>These relate to informative elements that provide either useful information or are descriptive in the explanation and understanding of statements or concepts in the audit criteria</i> |

Each condition has been ascribed a colour-coded status indicator of Compliant (green), Partially Compliant (orange), major-compliant (red), Not Auditable/Audited (grey), Work in Progress (light red) and Informative (blank/white) to assist the reader in determining aspects that require attention to improve on compliance achieved, if and where applicable. No compliance scoring is attributed any of the audit criteria information pertaining to the following three audit status symbols, namely 'NA', 'WiP', and 'info' as they were either not auditable and/or were not applicable/relevant at the time the audit was undertaken. In other words, they are excluded from the overall compliance rating calculations.

An overall compliance rating is calculated as a percentage to provide the reader with an overview of compliance to the relevant audit criteria however each condition should be considered on its own merits as the ratings do not necessarily portray the severity or impact of the reported finding relating to a condition.

## 16 ASSUMPTIONS AND LIMITATIONS

The ECO compliance audit and associated report are based upon the assumptions that:

- i. Documentation provided to the ECO/auditor is factual and true.
- ii. The audit is based purely on the conditions as stipulated in the EAs and EMPs.
- iii. The construction phase is currently underway and operational phase activities are not applicable.
- iv. Documentation / reports were randomly sampled / reviewed in order to accommodate time constraints.
- v. Where visual observations were not possible either due to physical access constraints or safety constraints, the ECO/auditor used other means to determine compliance, either through requesting written evidence provided by contractors / service providers who service the site or via interviews with technical site-based staff.

## 17 CONSULTATION PROCESS

The approach of consultation followed during the environmental audit was based on written (email) and telephonic correspondence between the ECO/auditor and the Environmental Site Compliance Officer which also includes consultation and communication with the EA holder and competent authority in terms of report submission.

## 18 FINDINGS

Findings are listed in the attached checklists, and it should be noted that findings should be considered individually in the context of the full audit and each condition and associated rating.

The following findings were noted onsite:

- Clearance of alien vegetation partly done on the cleared areas and stockpiles
- Water ponding was observed on the trenches, PV areas and roads.
- Sign of erosion were observed on the roads and the cleared areas.
- Topsoil is being mixed with spoil material.
- Truck is driving on topsoil stockpiles which may result in compaction.
- Some trenches were observed as not being barricaded.
- Chemical bunds accumulating rainwater
- Cattle roaming on the construction area.
- Cleared vegetation being swept by stormwater.
- Drip trays had rainwater.
- Large quantities pallets and plastic straps of found at the waste area.
- The bund at the waste area was leaking.
- Machinery standing with on drip trays.
- Oil spillage was observed.

Based on the outcomes of the audit it was established that the objectives of the EAs and EMPs were achieved in terms of:

- i. *Sufficiently providing for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis.*
- ii. *Ensuring compliance with the provisions of environmental authorisation and EMPs.*

### 18.1 Minor improvements required.

- Resealing the edges of the bund to prevent wastewater from contaminating the soil.
- Use drip trays on all standing equipment.
- Drip trays must be emptied after rain.



## 18.2 Major improvements required.

- Clearance of alien vegetation must be done on all affected areas.
- Road maintenance must be done.
- Waste must be removed more frequently onsite.
- Install draining systems and oil separators on the chemical bunds.
- Ensure gates are always closed or broken fences are maintained.
- All trenches must be barricaded.
- Stormwater measures must be implemented.
- Waste must be moved timeously.

## 19 AUDIT SUMMARY

In terms of the findings and results of the **September 2025** ECO audit, the project achieved an overall **97.43% compliance** rating with the conditions of the EAs and EMPs.

**Table 4:** Compliance Scoring

| No.                                       | Audit criteria                                                                             | Compliant (C) | Partially Compliant (PC) | Major-non-Compliant (NC) | Work in Progress | Normative (info) | Not Applicable / Not Audited (NA) | Percentage Score      |
|-------------------------------------------|--------------------------------------------------------------------------------------------|---------------|--------------------------|--------------------------|------------------|------------------|-----------------------------------|-----------------------|
| 1                                         | Environmental Authorisation for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1) | 24            | 1                        | 0                        | 1                | 20               | 2                                 | (98%)                 |
| 2                                         | Environmental Authorisation for Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)   | 24            | 1                        | 0                        | 1                | 20               | 2                                 | (98%)                 |
| 3                                         | Environmental Authorisation for Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)   | 24            | 1                        | 0                        | 1                | 20               | 2                                 | (98%)                 |
| 4                                         | EMPr for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)                        | 258           | 18                       | 0                        | 0                | 15               | 29                                | (97%)                 |
| 5                                         | EMPr Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)                              | 258           | 18                       | 0                        | 0                | 16               | 28                                | (97%)                 |
| 6                                         | EMPr Virginia 3 Solar Park (DFFE REF NO: 14/12/16/3/3/2/2101)                              | 227           | 14                       | 0                        | 0                | 43               | 39                                | (97%)                 |
| Overall total no. conditions              |                                                                                            | 815           | 53                       | 0                        | 3                | 134              | 102                               |                       |
| Audited conditions                        |                                                                                            | 1630          | 53                       | 0                        | -                | -                | -                                 | (Potential max score) |
| Overall Compliance Rating Calculation (%) |                                                                                            | 97.43%        |                          |                          |                  |                  |                                   |                       |

## 20 RECOMMENDATIONS

**Based on the findings identified the following is recommended:**

- Alien vegetation clearance must continue onsite; more resources must be allocated towards alien vegetation removal.
- Contractor to monitor newly cleared areas for alien vegetation establishment,
- All trenches must be barricaded at the end of each working day.
- All equipment must be equipped with a drip tray.
- Truck drivers must be trained on handling topsoil.
- Cleared alien vegetation must be taken to the landfill.
- Road must be maintained to correct the effects of erosion and water ponding.
- Stormwater measures must be implemented, measures to be implement must align with the current conditions onsite.
- Drip trays must be used on all standing equipment including trucks waiting to be onboarded.
- The edges of the waste bund must be resealed to prevent wastewater from contaminating soil.
- Waste must be removed from the waste area more frequently to prevent overstocking the waste area.
- Gates must always be closed, and broken fences must be fixed to prevent cattle from roaming onsite.

## 21 CONCLUSION

The contractor must ensure that systems and resources to monitor and manage environmental risks and impacts adequately are in place. Resources and personnel to train employees on the contents of the EMPs must be made to ensure that the project runs effectively and efficiently with minimal impact to the biophysical and socio-economic environment.

In general, the EMPs are effective in their current format in terms of content and relevance and there are no major shortcomings. The EMPs sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with this project.

**PREPARED BY:**

A handwritten signature in black ink, appearing to read 'Sakaunda'.

**Sakaunda Jennipher**

Environmental Control Officer

NCC Operations (Pty) Ltd

**M** ·069 510 7630

**E** · [jenniphers@ncc-group.co.za](mailto:jenniphers@ncc-group.co.za)

**REVIEWED BY:**

A handwritten signature in black ink, appearing to read 'Nick Gates'.

**Nick Gates**

Senior Environmental Consultant

NCC Operations (Pty) Ltd

**M** ·073 1998 431

**E** ·[nickg@ncc-group.co.za](mailto:nickg@ncc-group.co.za)

## ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

### Open Concerns/Complaint

| No | Observation date | Concern/Complaint | Suggested Due Date <sup>1</sup> | Proposed Corrective Action | Status | Closure status |
|----|------------------|-------------------|---------------------------------|----------------------------|--------|----------------|
|    |                  |                   |                                 |                            |        |                |

*\*The concerns register is updated once the ECO is present on site.*

### Closed Concerns

| No | Observation date | Concern/Complaint | Due Date suggested by ECO | Corrective Action Taken | Outcome | Closure status |
|----|------------------|-------------------|---------------------------|-------------------------|---------|----------------|
|    |                  |                   |                           |                         |         |                |
|    |                  |                   |                           |                         |         |                |

## ANNEXURE B - NCR REGISTER

| Ref No. | Originator | Dated Issued | Description | Proposed Corrective Action | Closure Status | Closure Date | Further Action Required |
|---------|------------|--------------|-------------|----------------------------|----------------|--------------|-------------------------|
|         |            |              |             |                            |                |              |                         |

## ANNEXURE C - INCIDENT REGISTER

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                       | Volume                                         | Remedial Action                                              |                                                                                |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                                                 |                                                | Immediate<br>Corrective<br>Actions                           | Preventative<br>measures                                                       |
| 20/03/2025 | Waste water                                                                                     | Soil pollution                                                                               | On 20, 2025, at approximately 8:28, the conservative tank being used to collect wastewater from conservancy tank had overfilled, and a Spillage had occurred spillage of approximately 8-10 litres of wastewater mixed with the cleaning material. the toilet supplier attended to the spill immediate & initiated spill Clean-up. Contaminated soil was taken to the hazardous waste skip.   | 10 l<br>(below<br>Section<br>30<br>threshold ) | Clean- up must be done as soon as the spills are identified. | The conservancy tank must be emptied more frequently to reduce overfilling.    |
| 19/03/2025 | Waste water                                                                                     | Soil pollution                                                                               | Approximately 12 litres of wastewater mixed with the cleaning chemicals where toilets are located. The toilet had been leaking since the previous day and wastewater was contained in a drip tray. The toilet supplier was notified, and he came to service<br><br>The toilets; however, during servicing; the drip tray spilled over causing the spillage of the wastewater onto the ground. | 12l<br>(below<br>Section<br>30<br>threshold )  | Clean- up must be done as soon as the spills are identified. | Leaking toilets must not be allowed onsite.                                    |
| 08/03/2025 | Diesel spillage                                                                                 | Soil pollution                                                                               | On 08 March 2025 at 05:30, security supervisor discovered a diesel leakage during the morning patrol. The spillage occurred due to the diesel injectors that were                                                                                                                                                                                                                             | 20l<br>(below<br>Section<br>30<br>threshold )  | Clean- up must be done as soon as the spills are identified  | Vehicles must be maintained regular. only road worthy vehicles must be onsite. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                 | Volume                                   | Remedial Action                                             |                                                                                |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                              |                                          | Immediate Corrective Actions                                | Preventative measures                                                          |
|            |                                                                                  |                                                                            | loose one of them was not properly fitted and diesel pressure removed them while the bakkie was in motion.                                                                                                                                                                                                                                                              |                                          |                                                             |                                                                                |
| 07/03/2025 | Water and antifreeze                                                             | Soil pollution                                                             | The Driver parked the minibus on site, shortly a leak observed containing a mixture of water and antifreeze, while also exhibiting signs of overheating.                                                                                                                                                                                                                | -                                        | Clean- up must be done as soon as the spills are identified | Vehicles must be maintained regular. only road worthy vehicles must be onsite. |
| 06/05/2025 | Water mixed with antifreeze spillage                                             | Soil pollution                                                             | On 6 May 2025 at 14:00, the TLB Operator was busy moving spoil material near the access road to the allocated spoil Stockpile area, when the TLB, radiator fan belt snapped & the container that stores water & antifreeze busted. Approximately 5 Liters of water with antifreeze spilled                                                                              | 5 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.                  |
| 08/05/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | A chemical toilet in PV3 at the laydown area at around 3:53 pm, 08 May 2025 was reported to be leaking, when the toilet was assessed, it was identified that there was a broken pipe that leaked the chemical water. An immediate action was taken to clean up the spillage. The contaminated soil was collected into the bags and taken to site waste management area. | 6 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent.         |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                   | Volume                                   | Remedial Action                                             |                                                                        |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                |                                          | Immediate Corrective Actions                                | Preventative measures                                                  |
| 12/05/2025 | Diesel spillage                                                                  | Soil pollution                                                             | On 12-05-2025 at 06:40, the ambulance was on the way to the access control point along the main access road, when it had a sudden breakdown and diesel was spilled along the access road, leaving a trail of diesel spill for approximately +400 Metres. Approximately +-2 Litres of diesel was spilled                                                                                                                                                   | 2 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.          |
| 15/05/2025 | Hydraulic oil spillage                                                           | Soil pollution                                                             | On the 15/05/2025, a side tipper truck was transporting spoil material when the cylinder failed and spilled ~7 litres of hydraulic oil, about 455m from the nearest watercourse. The contaminated soil was promptly cleaned up.                                                                                                                                                                                                                           | 7 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.          |
| 20/05/2025 | Toilet Cleaner mixed with water spillage                                         | soil pollution                                                             | It was around 11:30 am when it was reported that there was a spillage, that when the Fidamo team was about to clean the toilets at Pv1 Laydown area, a pipe from the generator busted and the water leaked from the broken pipe. The water that spilled was approximately 3-4 Liters and the pipe was immediately stopped. The chemical that was in the water is blue splash Toilet chemical. An immediate action was taken to clean up the spillage. The | 4 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent. |



| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                 | Volume                                                                             | Remedial Action                                                                                            |                                                                                                               |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                              |                                                                                    | Immediate Corrective Actions                                                                               | Preventative measures                                                                                         |
|            |                                                                                  |                                                                            | contaminated soil was collected into the bags and taken to site waste management area.                                                                                                                                                                                                                                                                                                                                  |                                                                                    |                                                                                                            |                                                                                                               |
| 21/05/2025 | Fauna                                                                            | Loss of biodiversity                                                       | On the 21/05/2025 a snake was fatally wounded during the internal road construction works.                                                                                                                                                                                                                                                                                                                              | N/A                                                                                | The dead animal was buried.                                                                                | N/A                                                                                                           |
| 26/05/2025 | Hydraulic oil spillage                                                           | Soil pollution                                                             | On 26/05/2025, at around 16:50 a drill rig operator noticed a leak from the machine, he immediately reported the leak to the supervisor. The supervisor called the mechanic but did not report the spillage. The oil further spilled to the soil during the repair attempts which were done under poor lighting. The spillage was left overnight and was only reported to the EO the next morning when the shift began. | 25 litres<br>(below Section 30 threshold)                                          | Clean- up must be done as soon as the spills are identified.                                               | The ESCO issued NCR to the subcontractor for failing to report spillage immediately.                          |
| 11/06/2025 | Concrete and oil Spillage                                                        | Soil pollution                                                             | On the 11 <sup>th</sup> of June 2025 the concrete mixer truck overturned resulting in the spillage of an estimated 3m <sup>3</sup> (3 cubic meters) of concrete and approximately 8litres of diesel. The contractor removed the spilled concrete and dumped it on the natural area adjacent to the road                                                                                                                 | 8 litres of diesel and 3m <sup>3</sup> of concrete<br>(below Section 30 threshold) | Clean- up must be done as soon as possible and an investigation must be done on the cause of the accident. | The ESCO issued an NCR to the subcontractor for failing to report dumping concrete on the natural vegetation. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                             | Volume                                 | Remedial Action                                                                                     |                                                                                                  |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|-----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                          |                                        | Immediate Corrective Actions                                                                        | Preventative measures                                                                            |
| 16/06/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | At 08:32am, on the 16th of June 2025, The Client (Robin) reported that ABLON's Ablution facilities were leaking which resulted to soil contamination, we immediately stopped everyone from using the Toilet and reported the issue to our service provider. A drip tray was placed immediately underneath the toilet. The event occurred at the OHL Site Camp and the name of the chemical that spilled on the ground is Portabloo Toilet Chemical. | 30 litres (below Section 30 threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 24/06/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | At around 8 am on the 24/06/2025 a spillage was reported by the contractor. Approximately 30 litres of Toilet Blue was spilled at the Virginia 1 laydown area. The spillage was cleaned up and the contaminated soil removed for disposal.                                                                                                                                                                                                          | 30 litres (below Section 30 threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 08/07/2025 | Hydraulic Oil Spillage                                                           | Soil pollution                                                             | A tipper truck spilled some hydraulic oil when the driver was offloading some excavated material at PV2 I8 road on the 08h of July 2025. The driver lifted the truck to off load the material when it was half way up, he discovered that the body of the truck was swinging to the sides and he tried to stop, and discovered some oil                                                                                                             | 30 litres (below Section 30 threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | Vehicles that are constantly breaking down must be moved off site.                               |

| Date | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                        | Volume | Remedial Action                    |                          |
|------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|------------------------------------|--------------------------|
|      | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                  |        | Immediate<br>Corrective<br>Actions | Preventative<br>measures |
|      |                                                                                                 |                                                                                              | leaks from the hydraulic cylinder, about +-9 litres of oil spilled to the ground and it was reported to the EO, immediately the supervisor and the driver cleaned the spillage and the contaminated soil was collected into bags and taken to ABC Solar Waste management area. |        |                                    |                          |

## **ANNEXURE D – PHOTOGRAPHS**



**Figure 1:** Cleared alien vegetation being moved by stormwater.



**Figure 2:** Sign of Erosion and water ponding onsite.





**Figure 3:** Unbaricaded trenches with water.



**Figure 4:** Small oil spillage.



**Figure 5:** Large pile wood pallets.



**Figure 6:** Cattle in the construction area.





**Figure 7:** Chemical bund accumulating rainwater.



**Figure 8:** Drip Trays with water.





**Figure 9:** Alien vegetation site.



**Figure 10:** Condition of the access road.



**Figure 11:** Equipment with on drip trays.



**Figure 12:** Leaking waste bund.





**Figure 13:** Topsoil mixed with spoil material.

**THIS PAGE WAS INTENTIONALLY LEFT BLANK**

**OCTOBER 2025**



---

# ECO MONTHLY ENVIRONMENTAL MONITORING REPORT

Virginia OPHL Line and Switching Station Matjhabeng,  
Lejweleputswa District Municipality within the jurisdiction  
of the Free State Province.

---

**PREPARED FOR:**

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

Department of Forestry, Fisheries, and the Environment: Compliance Monitoring

**DATED:**

October 2025

**PREPARED BY:**

NCC Operations

**T** • 021 702 2884

**E** • [info@ncc-group.co.za](mailto:info@ncc-group.co.za)

## DECLARATION OF INDEPENDENCE

I, Jennipher Sakaunda, as duly authorised representative of NCC Operations (Pty) Ltd ("**NCC**"), hereby confirm my independence (as well as that of NCC) as an auditor and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which URSA Energy (Pty) Ltd has appointed NCC as Environmental Control Officer ("**ECO**"), other than fair remuneration for work performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'J Sakaunda', is positioned below the 'Signed:' text.

**Jennipher Sakaunda**

03 November 2025

Environmental Control Officer

NCC Operations (Pty) Ltd

## **LIABILITY DISCLAIMER AND CONFIDENTIALITY CLAUSE**

All inspections conducted, as well as reports and recommendations provided by NCC are purely advisory. They are primarily intended for the purpose of assisting clients in loss control, risk management as well as health, safety, and environmental procedures.

Observations and recommendations are the result of practices and conditions observed, and information made available to us in various forms at the time of our visit. They do not purport to refer to or guarantee compliance with local or government regulations which may be applicable to such practices and conditions. This report should not be considered a definitive listing of all existing risks nor an absolute solution to all indicated risks, or hazards present from time to time in the Client Organisation. The report should always be considered in its entirety; individual sentences, paragraphs or sections of the report should not be used in isolation.

This report should not be reproduced except in its entirety, including this liability disclaimer or contents reproduced or disclosed to any third party without the prior written approval of NCC.

NCC assumes no responsibility for any losses incurred as a result of the implementation, management, and operation of recommended health, safety and environmental systems, processes and procedures.



## DOCUMENT CONTROL

|                     |                                             |
|---------------------|---------------------------------------------|
| <b>REPORT TITLE</b> | Monthly ECO Environmental Monitoring Report |
| <b>PROJECT</b>      | Virginia OPL Line and Switching Station     |
| <b>LOCATION</b>     | Free State Province                         |
| <b>EA HOLDER</b>    | URSA Energy (Pty) Ltd                       |
| <b>ECO</b>          | NCC Operations (Pty) Ltd                    |
| <b>REVISION</b>     | 00                                          |
| <b>DATE</b>         | 03/11/2025                                  |

| Revision | Date       | Description                  |
|----------|------------|------------------------------|
| Rev 00   | 03/11/2025 | First Draft - Internal       |
| Rev 01   | TBC        | Final - Authority submission |

## REPORT DISTRIBUTION LIST

| Name                   | Organisation                      | Issued     | Format     |
|------------------------|-----------------------------------|------------|------------|
| Janine Brasington      | Red Rocket South Africa (Pty) Ltd | 03/11/2025 | Electronic |
| Serina Pillay          | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Maggie Logan           | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Director of Compliance | DFFE                              | TBC        | Electronic |

## TABLE OF CONTENTS

|                                                    |           |
|----------------------------------------------------|-----------|
| <b>TABLE OF FIGURES .....</b>                      | <b>7</b>  |
| <b>ABBREVIATIONS .....</b>                         | <b>8</b>  |
| <b>1 INTRODUCTION .....</b>                        | <b>9</b>  |
| 1.1 Background.....                                | 9         |
| 1.2 Audit Scope and Purpose.....                   | 11        |
| 1.3 Monitoring Frequency and Reporting.....        | 11        |
| <b>2 AUDITOR BACKGROUND. ....</b>                  | <b>12</b> |
| <b>3 GENERAL (NOTABLE EVENTS) .....</b>            | <b>13</b> |
| 3.1 General Outstanding matters.....               | 13        |
| 3.2 Audits (Internal and External).....            | 13        |
| <b>4 WASTE MANAGEMENT.....</b>                     | <b>14</b> |
| 4.1 Domestic/ General Waste.....                   | 14        |
| 4.2 Hazardous waste.....                           | 14        |
| 4.3 Wastewater .....                               | 15        |
| <b>5 PROTECTIVE MEASURES .....</b>                 | <b>15</b> |
| 5.1 General .....                                  | 15        |
| <b>6 ENVIRONMENTAL CONSERVATION.....</b>           | <b>16</b> |
| 6.1 Conservation of Flora and Fauna.....           | 16        |
| 6.2 Water Management.....                          | 16        |
| 6.3 Soil Management .....                          | 16        |
| 6.4 Stormwater and Erosion onsite .....            | 17        |
| <b>7 INFRASTRUCTURE MANAGEMENT.....</b>            | <b>17</b> |
| 7.1 Access Roads.....                              | 17        |
| 7.2 Fences, Gates, and Barricading.....            | 17        |
| 7.3 Buildings and Structures .....                 | 17        |
| <b>8 SOCIAL RESPONSIBILITY.....</b>                | <b>17</b> |
| <b>9 ENVIRONMENTAL AWARENESS AND TRAINING.....</b> | <b>18</b> |
| <b>10 HERITAGE.....</b>                            | <b>18</b> |
| <b>11 WARNING &amp; NCRS.....</b>                  | <b>18</b> |

|           |                                                        |           |
|-----------|--------------------------------------------------------|-----------|
| <b>12</b> | <b>REHABILITATION .....</b>                            | <b>19</b> |
| <b>13</b> | <b>INCIDENTS AND ACCIDENTS .....</b>                   | <b>19</b> |
| <b>14</b> | <b>MEETINGS AND OTHER CORRESPONDANCE.....</b>          | <b>19</b> |
| <b>15</b> | <b>AUDIT METHODOLOGY.....</b>                          | <b>20</b> |
| 15.1      | Audit Process.....                                     | 20        |
| 15.2      | Observation and Recommendation Determination.....      | 21        |
| 15.3      | Findings.....                                          | 21        |
| 15.4      | Audit Tables and Compliance Ratings.....               | 21        |
| <b>16</b> | <b>ASSUMPTIONS AND LIMITATIONS .....</b>               | <b>23</b> |
| <b>17</b> | <b>CONSULTATION PROCESS.....</b>                       | <b>23</b> |
| <b>18</b> | <b>FINDINGS .....</b>                                  | <b>24</b> |
| 18.1      | Minor improvements required. ....                      | 24        |
| 18.2      | Major improvements required.....                       | 25        |
| <b>19</b> | <b>RECOMMENDATIONS .....</b>                           | <b>27</b> |
| <b>20</b> | <b>CONCLUSION.....</b>                                 | <b>27</b> |
|           | <b>ANNEXURE A – CONCERNS/COMPLAINTS REGISTER .....</b> | <b>29</b> |
|           | <b>ANNEXURE B - NCR REGISTER .....</b>                 | <b>29</b> |
|           | <b>ANNEXURE C - INCIDENT REGISTER.....</b>             | <b>30</b> |
|           | <b>ANNEXURE D – PHOTOGRAPHS .....</b>                  | <b>40</b> |
|           | <b>THIS PAGE WAS INTENTIONALLY LEFT BLANK .....</b>    | <b>47</b> |

## TABLE OF FIGURES

|                                                                     |    |
|---------------------------------------------------------------------|----|
| Figure 1: Sensitive/ no go areas must be demarcated. ....           | 41 |
| Figure 2: Overcrowded chemical bund.....                            | 41 |
| Figure 3: Torn barricade must be recycled.....                      | 42 |
| Figure 4: Container that must be emptied.....                       | 42 |
| Figure 5: Erected Monopole Tower.....                               | 43 |
| Figure 6: Alien vegetation on the stockpiles.....                   | 43 |
| Figure 7: Groundwater encountered.....                              | 44 |
| Figure 8: Alien vegetation being cleared.....                       | 44 |
| Figure 9: concrete being mixed on a concrete slab. ....             | 45 |
| Figure 10: Concrete being placed on plastic bags. ....              | 45 |
| Figure 11: Large quantities of waste stored at the waste area. .... | 46 |

## ABBREVIATIONS

|             |                                                         |
|-------------|---------------------------------------------------------|
| <b>BAR</b>  | Basic Assessment Report                                 |
| <b>CA</b>   | Competent Authority                                     |
| <b>DEA</b>  | Department of Environmental Affairs (now DFFE)          |
| <b>DFFE</b> | Department of Forestry, Fisheries, and the Environment  |
| <b>DWS</b>  | Department of Water and Sanitation                      |
| <b>EA</b>   | Environmental Authorisation                             |
| <b>EAP</b>  | Environmental Assessment Practitioner                   |
| <b>ECO</b>  | Environmental Control Officer                           |
| <b>EIA</b>  | Environmental Impact Assessment                         |
| <b>EMPr</b> | Environmental Management Programme                      |
| <b>EO</b>   | Environmental Officer (Contractor)                      |
| <b>ER</b>   | Employer's Representative                               |
| <b>ESCO</b> | Environmental Site Compliance Officer                   |
| <b>kV</b>   | Kilovolt                                                |
| <b>MVA</b>  | Megavolt Amperes                                        |
| <b>MW</b>   | Megawatt                                                |
| <b>NCC</b>  | NCC Operations                                          |
| <b>NCR</b>  | Non-Compliance Report                                   |
| <b>NEMA</b> | National Environmental Management Act (No. 107 of 1998) |
| <b>NWA</b>  | National Water Act (No. 36 of 1998)                     |
| <b>OHPL</b> | Overhead Power Line                                     |
| <b>SDC</b>  | Safe Disposal Certificate                               |
| <b>SHE</b>  | Safety, Health, and Environment                         |
| <b>SS</b>   | Substation                                              |
| <b>TBC</b>  | To Be Confirmed                                         |

# 1 INTRODUCTION

## 1.1 Background

NCC Operations (Pty) Ltd ("**NCC**") was appointed by URSA Energy (Pty) LTD ("**URSA**") to provide a suitably experienced independent Environmental Control Officer ("**ECO**") for the construction phase of Virginia Solar Park which will be connected to the Eskom Theseus Main Transmission Substation ("**MTS**"). The site is located on Farm Blomskraal 216, Ventersburg RD located within the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province. On completion the facility will consist of the Photovoltaic ("**PV**") Power Plant with a maximum generation capacity up to 100 MW, a 132kV powerline connecting the substation to the Eskom Theseus substation which is located 16.2 km North-East of the north-western corner of project site.

The ECO has the responsibility of ensuring the mitigation/ rehabilitation measures and conditions referred to in the Environmental Authorisation ("**EA**") are implemented, as well as ensuring compliance with the requirements of the Environmental Management Programme ("**EMPr**"). This report provides an insight into the overall compliance performance and a summary of other environmental concerns and potential environmental risks through observations during site inspections.

This report is based on the following environmental conditions or requirements:

- a) Environmental Authorisations
  - 1) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
  - 2) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)
- b) Environmental Management Programmes
- c) Relevant environmental legislation.
- d) All other environmental permits, licenses, and authorisations.

The notification of commencement of construction was submitted to the DFFE for Virginia Solar Plant (Pty) Ltd on the 02 May 2024.

This report addresses conditions set out in the EA which states the ECO as part of their duties: *"The ECO must keep record of all activities on site, problems identified, transgressions noted, and a task schedule of tasks undertaken by the ECO."* As per the roles and responsibilities in the Virginia Solar Project ("**VSP**") EMPr, the

primary role of the ECO will be to monitor the construction activities and ensure that the mitigation measures of the EMPr and Environmental Authorisations (EA) are implemented. This report also includes an audit checklist for the VSP EA as follows:

- 1) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
- 2) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)

A summary of the various environmental requirements i.e. the audit criteria relating to the overall project is provided in **Table 1**.

**Table 1:** Summary of environmental requirements / criteria relating to the overall project.

| Components of overall project         | Environmental requirements / criteria |               |                                |              |
|---------------------------------------|---------------------------------------|---------------|--------------------------------|--------------|
|                                       | DFFE EA Ref No.                       | Issue date    | Approved EMPr<br>(Compiled by) | Date         |
| Virginia Solar Park Switching Station | 14/12/16/3/3/2/2099/2                 | 20 April 2022 | Terramanzi Group (Pty) Ltd     | October 2023 |
| Virginia Solar Park OHPL              | 14/12/16/3/3/1/2444                   | 02 Feb 2022   | Terramanzi Group (Pty) Ltd     | October 2023 |

This report represents the monitoring for the Construction Phase. The responsibility of enforcement of the conditions of the EAs and EMPrs lies with the Project and Project Manager, while the Department of Forestry, Fisheries, and the Environment (“DFFE”) Environmental Management Inspectorate (“EMI”) may also enforce existing and potentially new conditions through compliance notices.

An Environmental Site Compliance Officer (“ESCO”) has been appointed by the holder of the EA to monitor the project compliance onsite on a full-time basis on behalf of the EA holder. The responsibilities of the ESCO includes:

- Monitoring conditions of the Basic Assessment Reports (“BARs”), Environmental Impact Report (EIR) EAs and the EMPrs.
- Ensuring compliance with all relevant environmental legislation.
- Approving method statements (reviewed by the ECO and co-approved by Site Manager).
- Remaining employed until the completion of the construction activities.
- Reporting to the Project Manager, including all findings identified onsite.

- Reporting any significant findings to the ECO.
- Preparing and submitting monthly reports to the ECO and Project Manager.
- Monitoring compliance by the Contractor.

In addition, the ESCO will:

- Undertake daily inspections of the site and surrounding areas.
- Audit compliance with the EMPr and conditions of the environmental authorisation.
- Take appropriate action if the specifications contained in the EMPr and conditions of the environmental authorisation are not followed.
- Monitor and verify that environmental impacts are kept to a minimum, as far as possible; and
- Ensure that activities onsite comply with all relevant environmental legislation.

## **1.2 Audit Scope and Purpose.**

In accordance with Regulation 34 of the 2014 NEMA EIA Regulations (as amended) the holder of an environmental authorisation must, for the period during which the EA and EMPr, and where applicable the closure plan, remain valid —

- a) Ensure that the compliance with the conditions of the EA and the EMPr, and where applicable the closure plan, is audited; and*
- b) Submit an environmental audit report to the relevant competent authority.*

The purpose of this environmental audit is to verify compliance to the overarching environmental requirements specified as conditions of the EAs and EMPrs, and report on the extent to which the objectives of the EMPrs and are being achieved.

## **1.3 Monitoring Frequency and Reporting.**

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 27<sup>th</sup> of October 2025 after which this report was compiled which serves to document and audit. This report covers the monthly reporting for the month of October 2025.



## 2 AUDITOR BACKGROUND.

NCC is a multi-disciplinary environmental consulting company based in South Africa which adopts a 'values driven' approach with a common purpose to conserve and create sustainable environments that enable people, planet and business to thrive. We are a trusted partner to major engineering and construction firms, mines, parastatals, film, sports and event production companies, municipalities, provincial and national government, and conservation organisations. Drawing on our years of experience on a wide range of projects, NCC works with our clients to develop, implement, and monitor customised services that add real value.

The auditor, **Jennipher Sakaunda**, is a senior environmental manager with more than 14 years' experience currently employed with NCC. Jennipher Sakaunda has experience in several environmental fields including environmental compliance monitoring and auditing, due diligence assessment, environmental impact and risk assessment, and compilation of environmental management plans/programmes.

**Table 2:** Details of the auditor.

|                       |                                                                                                                                                                                                |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Company</b>        | NCC Operations (Pty) Ltd                                                                                                                                                                       |
| <b>Auditor</b>        | Jennipher Sakaunda                                                                                                                                                                             |
| <b>Tel</b>            | +27 21 702 2884                                                                                                                                                                                |
| <b>Mobile</b>         | +27 69 510 7630                                                                                                                                                                                |
| <b>Email</b>          | <a href="mailto:jenniphers@ncc-group.co.za">jenniphers@ncc-group.co.za</a>                                                                                                                     |
| <b>Address</b>        | 26 Bell Close, Westlake Business Park Westlake, 7945                                                                                                                                           |
| <b>Affiliation</b>    | International Association of Impact Assessment South Africa.<br>Environmental Assessment Practitioner Association of South Africa.<br>South African Council of Natural Scientific Professions. |
| <b>Qualifications</b> | BSc (honors) Environmental Management                                                                                                                                                          |
| <b>Expertise</b>      | A detailed CV can be provided on request.                                                                                                                                                      |

### 3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (October 2025) included the following:

- Excavation of monopole foundations.
- Cast blinding slab and steel fixing at the OHL
- Erection of monopole towers at the OHL.
- Filling and compaction of borrow material.
- Construction of the internal road connecting the access road to the Temporary Site Offices (TSF) and Switching Station.
- Excavation and shuttering works for the IPP substation.

#### 3.1 General Outstanding matters

Any major outstanding matters are to be recorded and summarised in the Concerns Register (**Annexure A**). The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

#### 3.2 Audits (Internal and External)

Internal audits are undertaken monthly by the Red Rocket ESCO. This ECO Audit was undertaken on the 27<sup>th</sup> of October 2025. Audit tables/checklists are attached to this report. The ECO undertakes external monthly audits.

## 4 WASTE MANAGEMENT

The contractor must make provision for waste avoidance, minimisation, and separation of waste where possible through recycling efforts. Waste management awareness must be done on an ongoing basis and must be provided through toolbox talks and awareness posters. A waste station was constructed at V3 where waste is temporarily stored, sorted and recycled. The waste station includes a bund where waste will be stored and various compartments where waste will be sorted into. The contractor must ensure that the waste area has a roof to protect waste from weather elements. The contractor has constructed a sump on the waste area where wastewater will collect into. Recyclables are being stored until there are enough quantities to transport to Mpact for recycling. Large quantities of wood pallets and plastic straps were observed onsite. Waste must be removed more frequently to prevent stocking large quantities onsite.

### 4.1 Domestic/ General Waste

A total of **8604 kg** of general waste was generated on site in the month of October 2025; **5802 kg** constituting boxing and wooden pallets were recycled. A total of **2802 kg** of waste were disposed at the Matjhabeng Local Municipality waste disposal site. Waste bins are placed along the OHL line where each team will be working, at the end of the day waste is collected and placed at the laydown areas for temporary storage. Designated waste areas have been provided at the contractors' main site offices/laydown areas for purposes of temporary storage of waste prior to collection and transfer to the licensed waste facilities. Bins at the laydown area are colour coded for each waste type. The contractor has commenced with taking waste for recycling.

The service providers dispose the general waste at Matjhabeng Local Municipality waste disposal site-Licence number: B33/2/340/21/P8 16/2/7/C404/D2/Z1/P367. Proof of disposal is available on request.

### 4.2 Hazardous waste

Hazardous waste skips are available at the dedicated waste storage area at each of the sub-contractors' site offices/lay down areas. The contractor disposed **4515 kg** of hazardous waste in October 2025. Hazardous waste in form of oil spillages, cement spillages and contaminated soil is kept onsite until there is enough to dispose. No major spillages have been recorded on site. A container that was used as for casting concrete blocks has rain accumulate water and mosquito larvae was observed. The wastewater and concrete must be disposed of as hazardous.

### 4.3 Wastewater

Approximately **111 556.3 L** of sewerage waste was generated on site in the month of October 2025. Chemical toilets and a conservancy tank have been provided onsite. No incidents' spillages from the chemical toilets have been recorded. The contractor must ensure these chemical toilets are serviced regularly and drip trays are placed under each toilet.

The General Authorisation that was issued by DWS for the includes the use of a conservancy tank up to a capacity of 50 000 L. The conservancy tank onsite has a capacity of 12 500 L which is below the stipulated GA threshold. The contractor must ensure that this capacity is not exceeded.

The Appointed Service Provider removes sewage and disposes of it at Matjhabeng Local Municipality wastewater treatment facility - Licence No: 10/D4/J/G/2082. Proof of disposal is available onsite. The contractor must ensure the appointed service provider is licenced to provide sewer removal services. With the work being spread out on the lines the contractor must ensure ablutions are within walking distance within the areas where people are working.

## 5 PROTECTIVE MEASURES

### 5.1 General

Protective measures have been deployed to mitigate environmental impacts or prevent impacts from occurring which includes:

- Security guards are present on the site, with access control in place.
- Induction training is conducted for all persons working and visiting the site.
- Snake gaiters are provided.
- Spill kits are available on site.
- No-go areas are demarcated and provided with signage.
- Access cards are used to enter and exit the site.
- Rapid alcohol detecting is in place.

## 6 ENVIRONMENTAL CONSERVATION

### 6.1 Conservation of Flora and Fauna

A permit to clear the site and relocate species of concern was received from the Free state Department of Economic, Small Business Development, Tourism and Environmental Affairs. The permit with Ref No. 202306000012649 was issued on 08/06/2023 to pluck protected and unprotected flora.

Clearance of alien vegetation has is in progress, however the pace at which the contractor is removing alien vegetation is concerning especially with the onset of rains is expected in October. More resources must be allocated towards alien vegetation removal. It is important that the contractor clears all the alien vegetation as some of the alien plants will soon be dispersing seed creating a seed bank. The contactor must monitor the cleared areas to ensure alien vegetation does not re-establish. The contractor must make an effort to remove the stockpiled alien vegetation to the Matjhabeng Local Municipality for disposal.

### 6.2 Water Management

Approximately **19m<sup>3</sup>** of water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The GA allows for abstraction of 43 000m<sup>3</sup> annually, the contactor must ensure water abstraction does not exceed the licenced volumes. The contactor also abstracted **2548 m<sup>3</sup>** of water from Sluice 16, another licenced source. Groundwater that was encountered on some of pits is being pumped out before excavation are backfilled or concrete is poured.

### 6.3 Soil Management

Cleared topsoil has been stockpiled along the OHL line and the switching station. These must be protected from erosion and alien vegetation establishment. In some areas where the contractor has finished pouring concrete and the pits have closed. The contactor must ensure subsoil is used for infilling. Topsoil must only be spread after the structures have erected to prevent compaction. Groundwater encountered during excavation must be pumped out before concrete is poured to prevent ground water contamination.

#### **6.4 Stormwater and Erosion onsite**

The contractor's Stormwater Management Plan was approved, although measures to manage erosion as per the approved SWMP have been implemented signs of erosion and water ponding were observed. The SWMP must be revised to reflect the current conditions onsite. Measures to divert clean stormwater away from the works towards the watercourses must be implemented.

### **7 INFRASTRUCTURE MANAGEMENT**

#### **7.1 Access Roads**

The project team is using existing farm roads for current construction activities until such time as the project access roads and internal roads have been constructed. Since water ponding and erosion was observed on the roads maintenance work must be done. Maintenance of the access roads must be done on a regular basis.

#### **7.2 Fences, Gates, and Barricading**

The site is fenced with security personnel manning the gates. Access cards are used to allow entrance to site. Barricading was observed on site, and such should continue to be maintained around all open excavations along the OHPL servitudes to prevent potential fauna (wildlife and livestock) incidents. The contractor has put temporary fences which is more secure on some of the pits where work will continue at a later stage. Pits with ground water must be barricaded with temporary fences to prevent animals from falling into the pits. All excavation along the line must be barricaded and deep excavation signs and topsoil sign must be placed.

#### **7.3 Buildings and Structures**

Containers have been established on site by various subcontractors that are being used as offices. Male and female ablution facilities have been provided. Chemical toilets and a conservancy tank are used to manage sewer onsite.

### **8 SOCIAL RESPONSIBILITY**

Any complaints from the public are to be recorded on complaints register maintained by the Contractor whose responsibility it is to track and resolve the complaints/issues that are raised. In addition, a box for receiving internal grievances is present at the main site office facility which allows for project staff to bring to the attention of the project management team any comments and or concerns.

## 9 ENVIRONMENTAL AWARENESS AND TRAINING

The contractor has undertaken Toolbox talks for the month of October 2025 covering the following topics:

- Cement and concrete use
- Stormwater management
- General authorisation
- Housekeeping
- Use of drip trays
- Waste separation
- Topsoil maintenance and management
- Snakes onsite
- Safe smoking practices
- Wildlife safety
- Staff facility management
- Smoking policy
- Alien invasive plants management
- Waste management
- Pouring Cement using a mixer truck
- No use of danger tape onsite

## 10 HERITAGE

In the event of any unknown artefacts being uncovered during construction, the ESCO and Project Manager must be informed immediately who must then instruct work to be stopped in the immediate area and then promptly report the discovery/finding to the ECO, a heritage specialist and the relevant heritage authority to investigate and confirm if such discovery is in fact a heritage artefact of any significance. No activities impacting upon any heritage sites were reported during this reporting period.

## 11 WARNING & NCRS

No NCR reports were issued by the ECO in the month of October 2025.

## 12 REHABILITATION

No rehabilitation works have commenced during this period, further rehabilitation is expected to occur on the project as and when other works have been completed.

## 13 INCIDENTS AND ACCIDENTS

All environmental related events, incidents and accidents are to be reported directly to the ECO and kept on a central register and included in the monthly report. No environmental incidents that are reportable under Section 30 of the NEMA occurred in October 2025. A register of environmental incidents is attached as **Annexure C**.

## 14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 27<sup>th</sup> of October 2025 with observations documented in this report. Monthly ECO compliance reports are submitted to the Department (DFFE) by the ECO.



## 15 AUDIT METHODOLOGY

This section provides an overview of the methods employed in making observations and providing recommendations and conclusions derived from the audit procedures undertaken.

### 15.1 Audit Process

The site visit, data reviews and report drafting were undertaken by the ECO/auditor. The audit included the following procedures:

- **Site Inspections.** The areas and aspects covered during the inspections with concurrent discussions with the ESCO and site-based representatives of the EA holder included *inter alia*:
  - i. Access control to the sites.
  - ii. Ecologically sensitive areas, where applicable.
  - iii. Waste management.
  - iv. Incident and complaints management.
  - v. Landowner relations.
  - vi. Infrastructure management.
  - vii. Environmental Awareness.
  - viii. Record-keeping and document control.
  - ix. Stormwater and Erosion management
- **Documentation review.** This included:
  - i. A review of the EAs, EMPs and where applicable, method statements.
  - ii. A review of previous audit reports, records, observations, and findings.
  - iii. A review of any remedial and/or protective measures implemented.
  - iv. Identification, if applicable, any gaps requiring action and/or rectification.
- **Audit Report compilation.** This included:
  - i. Recording any observations and findings identified during the audit.
  - ii. Providing recommendations relating to improvement or non-compliance, if and where applicable.

## 15.2 Observation and Recommendation Determination

Observations and subsequent recommendations were based on and are limited to the following:

- i. Available documentation and records viewed or received prior, subsequent, or during the site visit.
- ii. Observations made during the period that the ECO/auditor was on site; and
- iii. Information received from both direct and cross-referenced discussions with permanent site-based staff.

## 15.3 Findings

Any key findings highlighted in this report will indicate areas and/or aspects that require improvement or rectification. The purpose of summarising the findings is to allow the EA holder to identify common management challenges that effect the level of compliance to the conditions of the EAs and EMPrs.

Where findings and recommendations pertaining are deemed significant through compliance status or performance, they are documented as specific issues in the report. All site-specific observations are recorded in the corresponding audit checklist tables.

## 15.4 Audit Tables and Compliance Ratings

The audit table captures observations and recommendations made in relation to the conditions stipulated in the EAs and EMPrs. It provides the reader with more detailed information in terms of what the stipulated requirements are in relation to the organisation's assessed current compliance status, according to the observations recorded by the auditor.

Ratings are calculated based on a scoring system whereby each auditable condition is provided with a score as highlighted in **Table 4** below.

**Table 4:** Compliance rating and scoring.

| Status                              | Compliance Rating |         | Description                                                                                                                                                                                |
|-------------------------------------|-------------------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | Abbreviation      | Scoring |                                                                                                                                                                                            |
| <i>Compliant</i>                    | C                 | 2       | <i>No improvements required</i>                                                                                                                                                            |
| <i>Partially Compliant</i>          | PC                | 1       | <i>Minor improvements required</i>                                                                                                                                                         |
| <i>Non-Compliant</i>                | NC                | 0       | <i>Major improvements required</i>                                                                                                                                                         |
| <i>Work in Progress</i>             | WiP               | -       | <i>Environmental management measures are underway but not yet fully implemented or verified, requiring further monitoring and assessment.</i>                                              |
| <i>Not Applicable / Not Audited</i> | NA                | -       | <i>No improvements required and / or the condition is either not, not yet or no longer relevant at the time of the audit</i>                                                               |
| <i>Informative</i>                  | info              | -       | <i>These relate to informative elements that provide either useful information or are descriptive in the explanation and understanding of statements or concepts in the audit criteria</i> |

Each condition has been ascribed a colour-coded status indicator of Compliant (green), Partially Compliant (orange), major-compliant (red), Not Auditable/Audited (grey), Work in Progress (light red) and Informative (blank/white) to assist the reader in determining aspects that require attention to improve on compliance achieved, if and where applicable. No compliance scoring is attributed any of the audit criteria information pertaining to the following three audit status symbols, namely 'NA', 'WiP', and 'info' as they were either not auditable and/or were not applicable/relevant at the time the audit was undertaken. In other words, they are excluded from the overall compliance rating calculations.

An overall compliance rating is calculated as a percentage to provide the reader with an overview of compliance to the relevant audit criteria however each condition should be considered on its own merits as the ratings do not necessarily portray the severity or impact of the reported finding relating to a condition.

## 16 ASSUMPTIONS AND LIMITATIONS

The ECO compliance audit and associated report are based upon the assumptions that:

- i. Documentation provided to the ECO/auditor is factual and true.
- ii. The audit is based purely on the conditions as stipulated in the EAs and EMPs.
- iii. The construction phase is currently underway and operational phase activities are not applicable.
- iv. Documentation / reports were randomly sampled / reviewed in order to accommodate time constraints.
- v. Where visual observations were not possible either due to physical access constraints or safety constraints, the ECO/auditor used other means to determine compliance, either through requesting written evidence provided by contractors / service providers who service the site or via interviews with technical site-based staff.

## 17 CONSULTATION PROCESS

The approach of consultation followed during the environmental audit was based on written (email) and telephonic correspondence between the ECO/auditor and the Environmental Site Compliance Officer which also includes consultation and communication with the EA holder and competent authority in terms of report submission.

## 18 FINDINGS

Findings are listed in the attached checklists, and it should be noted that findings should be considered individually in the context of the full audit and each condition and associated rating.

The following findings were noted onsite:

- Alien vegetation was observed on stockpiles.
- All excavated pits are secured with barricade nets.
- Some OHPL points are not located on the same coordinates as on the Environmental Authorisation. These points are however located as per the approved Final Layout.
- Groundwater has been encountered during monopole excavations.
- A few monopole towers were erected.
- Chemical containers are overcrowded in the chemical bund
- Leftover cement was being placed on plastic papers.
- Some excavations were observed to have no deep excavation and topsoil signage.
- No barricading has been erected for the no-go areas by the wetland at tower 13.
- Large quantities pallets and plastic straps of found at the waste area.
- Container for casting concrete block accumulated rainwater.
- The access road in a bad condition.

Based on the outcomes of the audit it was established that the objectives of the EAs and EMPs were achieved in terms of:

- i. *Sufficiently providing for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis.*
- ii. *Ensuring compliance with the provisions of environmental authorisation and EMPs.*

### 18.1 Minor improvements required.

- Emptying the concrete casting container.

## 18.2 Major improvements required.

- Clearance of alien vegetation must be done on all affected areas.
- A barricading net must be placed to demarcate the no-go areas at the wetland area.
- Road maintenance must be done.
- Groundwater must be pumped out before excavations are refilled.
- Waste must be removed more frequently onsite.
- Install draining systems and oil separators on the chemical bunds.
- Establish another chemical bund.
- A waste skip must be placed at the switching station.

## 19 AUDIT SUMMARY

In terms of the findings and results of the **October 2025** ECO audit, the project achieved an overall **99%** compliance rating with the conditions of the EAs and EMPs.

**Table 5: Compliance Scoring**

| No.                                       | Audit criteria                                                                                             | Compliant (C) | Partially Compliant (PC) | Major-non-Compliant (NC) | Work in Progress | Normative (info) | Not Applicable / Not Audited (NA) | Percentage Score      |
|-------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------|--------------------------|--------------------------|------------------|------------------|-----------------------------------|-----------------------|
| 1                                         | Environmental Authorisation for Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)                | 24            | 0                        | 0                        | 1                | 18               | 3                                 | 100%                  |
| 2                                         | Environmental Authorisation for Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2) | 26            | 1                        | 0                        | 1                | 19               | 3                                 | 98%                   |
| 3                                         | EMPr Virginia Solar Park OHPL (DFFE REF NO: 14/12/16/3/3/1/2444)                                           | 216           | 7                        | 1                        | 0                | 46               | 58                                | 98%                   |
| 4                                         | EMPr Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2)                            | 177           | 0                        | 1                        | 0                | 22               | 27                                | 99%                   |
| Overall total no. conditions              |                                                                                                            | 442           | 8                        | 2                        | 2                | 105              | 91                                |                       |
| Audited conditions                        |                                                                                                            | 884           | 8                        | 0                        | 0                | -                | -                                 | (Potential max score) |
| Overall Compliance Rating Calculation (%) |                                                                                                            | 99%           |                          |                          |                  |                  |                                   |                       |

## 20 RECOMMENDATIONS

**Based on the findings identified the following is recommended:**

- Barricade the no-go area (wetland) at tower number 13 with a barricade net to demarcate the boundaries of the sensitive sites. Only a no-go sign has been placed.
- Pits with ground water must be barricaded with temporary fence to prevent animals from drowning.
- Alien vegetation clearance must continue onsite, and the contractor must monitor the cleared areas to prevent reestablishment of alien vegetation.
- Where groundwater is encountered it must be pumped out before concrete is poured.
- Roads must be maintained to correct the effects of erosion and water ponding.
- Stormwater measures must be implemented, measures to be implemented must align with the current conditions onsite.
- Drip trays must be used on all standing equipment including trucks waiting to be onboarded.
- Waste must be removed from the waste area more frequently to prevent overstocking the waste area.
- A skip must be supplied at the switching station to be used for cement disposal.

## 21 CONCLUSION

The contractor must ensure that systems and resources to monitor and manage environmental risks and impacts adequately are in place. Resources and personnel to train employees on the contents of the EMPs must be made to ensure that the project runs effectively and efficiently with minimal impact to the biophysical and socio-economic environment.

In general, the EMPs are effective in their current format in terms of content and relevance and there are no major shortcomings. The EMP's sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with this project.



**PREPARED BY:**

A handwritten signature in black ink, appearing to read 'Sakaunda'.

**Sakaunda Jennipher**

Environmental Control Officer

NCC Operations (Pty) Ltd

**M** ·069 510 7630

**E** · [jenniphers@ncc-group.co.za](mailto:jenniphers@ncc-group.co.za)

**REVIEWED BY:**

A handwritten signature in black ink, appearing to read 'Nick Gates'.

**Nick Gates**

Senior Environmental Consultant

NCC Operations (Pty) Ltd

**M** ·073 1998 431

**E** ·[nickg@ncc-group.co.za](mailto:nickg@ncc-group.co.za)

## ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

### Open Concerns/Complaint

| No | Observation date | Concern/Complaint | Suggested Due Date <sup>1</sup> | Proposed Corrective Action | Status | Closure status |
|----|------------------|-------------------|---------------------------------|----------------------------|--------|----------------|
|    |                  |                   |                                 |                            |        |                |

*\*The concerns register is updated once the ECO is present on site.*

### Closed Concerns

| No | Observation date | Concern/Complaint | Due Date suggested by ECO | Corrective Action Taken | Outcome | Closure status |
|----|------------------|-------------------|---------------------------|-------------------------|---------|----------------|
|    |                  |                   |                           |                         |         |                |
|    |                  |                   |                           |                         |         |                |

## ANNEXURE B - NCR REGISTER

| Ref No. | Originator | Dated Issued | Description | Proposed Corrective Action | Closure Status | Closure Date | Further Action Required |
|---------|------------|--------------|-------------|----------------------------|----------------|--------------|-------------------------|
|         |            |              |             |                            |                |              |                         |

## ANNEXURE C - INCIDENT REGISTER

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                       | Volume                                         | Remedial Action                                              |                                                                                 |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|--------------------------------------------------------------|---------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                                                 |                                                | Immediate<br>Corrective<br>Actions                           | Preventative<br>measures                                                        |
| 20/03/2025 | Waste water                                                                                     | Soil pollution                                                                               | On 20, 2025, at approximately 8:28, the conservative tank being used to collect wastewater from conservancy tank had overfilled, and a Spillage had occurred spillage of approximately 8-10 litres of wastewater mixed with the cleaning material. the toilet supplier attended to the spill immediate & initiated spill Clean-up. Contaminated soil was taken to the hazardous waste skip.   | 10 l<br>(below<br>Section<br>30<br>threshold ) | Clean- up must be done as soon as the spills are identified. | The conservancy tank must be emptied more frequently to reduce overfilling.     |
| 19/03/2025 | Waste water                                                                                     | Soil pollution                                                                               | Approximately 12 litres of wastewater mixed with the cleaning chemicals where toilets are located. The toilet had been leaking since the previous day and wastewater was contained in a drip tray. The toilet supplier was notified, and he came to service<br><br>The toilets; however, during servicing; the drip tray spilled over causing the spillage of the wastewater onto the ground. | 12l<br>(below<br>Section<br>30<br>threshold )  | Clean- up must be done as soon as the spills are identified. | Leaking toilets must not be allowed onsite.                                     |
| 08/03/2025 | Diesel spillage                                                                                 | Soil pollution                                                                               | On 08 March 2025 at 05:30, security supervisor discovered a diesel leakage during the morning patrol. The spillage occurred due to the diesel injectors that were                                                                                                                                                                                                                             | 20l<br>(below<br>Section<br>30<br>threshold )  | Clean- up must be done as soon as the spills are identified  | Vehicles must be maintained regular . only road worthy vehicles must be onsite. |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                 | Volume                                            | Remedial Action                                             |                                                                                |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                           |                                                   | Immediate<br>Corrective<br>Actions                          | Preventative<br>measures                                                       |
|            |                                                                                                 |                                                                                              | loose one of them was not properly fitted and diesel pressure removed them while the bakkie was in motion.                                                                                                                                                                                                                                                              |                                                   |                                                             |                                                                                |
| 07/03/2025 | Water and antifreeze                                                                            | Soil pollution                                                                               | The Driver parked the minibus on site, shortly a leak observed containing a mixture of water and antifreeze, while also exhibiting signs of overheating.                                                                                                                                                                                                                | -                                                 | Clean- up must be done as soon as the spills are identified | Vehicles must be maintained regular. only road worthy vehicles must be onsite. |
| 06/05/2025 | Water mixed with antifreeze spillage                                                            | Soil pollution                                                                               | On 6 May 2025 at 14:00, the TLB Operator was busy moving spoil material near the access road to the allocated spoil Stockpile area, when the TLB, radiator fan belt snapped & the container that stores water & antifreeze busted. Approximately 5 Liters of water with antifreeze spilled                                                                              | 5 litres<br>(below<br>Section<br>30<br>threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.                  |
| 08/05/2025 | Toilet Cleaner mixed with water spillage                                                        | Soil pollution                                                                               | A chemical toilet in PV3 at the laydown area at around 3:53 pm, 08 May 2025 was reported to be leaking, when the toilet was assessed, it was identified that there was a broken pipe that leaked the chemical water. An immediate action was taken to clean up the spillage. The contaminated soil was collected into the bags and taken to site waste management area. | 6 litres<br>(below<br>Section<br>30<br>threshold) | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent.         |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                   | Volume                                            | Remedial Action                                             |                                                                        |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                             |                                                   | Immediate<br>Corrective<br>Actions                          | Preventative<br>measures                                               |
| 12/05/2025 | Diesel spillage                                                                                 | Soil pollution                                                                               | On 12-05-2025 at 06:40, the ambulance was on the way to the access control point along the main access road, when it had a sudden breakdown and diesel was spilled along the access road, leaving a trail of diesel spill for approximately +400 Metres. Approximately +2 Litres of diesel was spilled                                                                                                                                                    | 2 litres<br>(below<br>Section<br>30<br>threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.          |
| 15/05/2025 | Hydraulic oil spillage                                                                          | Soil pollution                                                                               | On the 15/05/2025, a side tipper truck was transporting spoil material when the cylinder failed and spilled ~7 litres of hydraulic oil, about 455m from the nearest watercourse. The contaminated soil was promptly cleaned up.                                                                                                                                                                                                                           | 7 litres<br>(below<br>Section<br>30<br>threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.          |
| 20/05/2025 | Toilet Cleaner mixed with water spillage                                                        | soil pollution                                                                               | It was around 11:30 am when it was reported that there was a spillage, that when the Fidamo team was about to clean the toilets at Pv1 Laydown area, a pipe from the generator busted and the water leaked from the broken pipe. The water that spilled was approximately 3-4 Liters and the pipe was immediately stopped. The chemical that was in the water is blue splash Toilet chemical. An immediate action was taken to clean up the spillage. The | 4 litres<br>(below<br>Section<br>30<br>threshold) | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                 | Volume                                                                             | Remedial Action                                                                                            |                                                                                                               |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                              |                                                                                    | Immediate Corrective Actions                                                                               | Preventative measures                                                                                         |
|            |                                                                                  |                                                                            | contaminated soil was collected into the bags and taken to site waste management area.                                                                                                                                                                                                                                                                                                                                  |                                                                                    |                                                                                                            |                                                                                                               |
| 21/05/2025 | Fauna                                                                            | Loss of biodiversity                                                       | On the 21/05/2025 a snake was fatally wounded during the internal road construction works.                                                                                                                                                                                                                                                                                                                              | N/A                                                                                | The dead animal was buried.                                                                                | N/A                                                                                                           |
| 26/05/2025 | Hydraulic oil spillage                                                           | Soil pollution                                                             | On 26/05/2025, at around 16:50 a drill rig operator noticed a leak from the machine, he immediately reported the leak to the supervisor. The supervisor called the mechanic but did not report the spillage. The oil further spilled to the soil during the repair attempts which were done under poor lighting. The spillage was left overnight and was only reported to the EO the next morning when the shift began. | 25 litres<br>(below Section 30 threshold)                                          | Clean- up must be done as soon as the spills are identified.                                               | The ESCO issued NCR to the subcontractor for failing to report spillage immediately.                          |
| 11/06/2025 | Concrete and oil Spillage                                                        | Soil pollution                                                             | On the 11 <sup>th</sup> of June 2025 the concrete mixer truck overturned resulting in the spillage of an estimated 3m <sup>3</sup> (3 cubic meters) of concrete and approximately 8litres of diesel. The contractor removed the spilled concrete and dumped it on the natural area adjacent to the road                                                                                                                 | 8 litres of diesel and 3m <sup>3</sup> of concrete<br>(below Section 30 threshold) | Clean- up must be done as soon as possible and an investigation must be done on the cause of the accident. | The ESCO issued an NCR to the subcontractor for failing to report dumping concrete on the natural vegetation. |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                             | Volume                                             | Remedial Action                                                                                     |                                                                                                  |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|-----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                       |                                                    | Immediate<br>Corrective<br>Actions                                                                  | Preventative<br>measures                                                                         |
| 16/06/2025 | Toilet Cleaner mixed with water spillage                                                        | Soil pollution                                                                               | At 08:32am, on the 16th of June 2025, The Client (Robin) reported that ABLON's Ablution facilities were leaking which resulted to soil contamination, we immediately stopped everyone from using the Toilet and reported the issue to our service provider. A drip tray was placed immediately underneath the toilet. The event occurred at the OHL Site Camp and the name of the chemical that spilled on the ground is Portabloo Toilet Chemical. | 30 litres<br>(below<br>Section<br>30<br>threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 24/06/2025 | Toilet Cleaner mixed with water spillage                                                        | Soil pollution                                                                               | At around 8 am on the 24/06/2025 a spillage was reported by the contractor. Approximately 30 litres of Toilet Blue was spilled at the Virginia 1 laydown area. The spillage was cleaned up and the contaminated soil removed for disposal.                                                                                                                                                                                                          | 30 litres<br>(below<br>Section<br>30<br>threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 08/07/2025 | Hydraulic Oil Spillage                                                                          | Soil pollution                                                                               | A tipper truck spilled some hydraulic oil when the driver was offloading some excavated material at PV2 I8 road on the 08h of July 2025. The driver lifted the truck to off load the material when it was half way up, he discovered that the body of the truck was swinging to the sides and he tried to stop, and discovered some oil                                                                                                             | 30 litres<br>(below<br>Section<br>30<br>threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | Vehicles that are constantly breaking down must be moved off site.                               |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Volume | Remedial Action                                                                                                                                    |                          |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |        | Immediate<br>Corrective<br>Actions                                                                                                                 | Preventative<br>measures |
|            |                                                                                                 |                                                                                              | leaks from the hydraulic cylinder, about +-9 litres of oil spilled to the ground and it was reported to the EO, immediately the supervisor and the driver cleaned the spillage and the contaminated soil was collected into bags and taken to ABC Solar Waste management area.                                                                                                                                                                                                                                                                                                                                          |        |                                                                                                                                                    |                          |
| 08/07/2025 | Hydraulic Oil Spillage                                                                          | Soil pollution, Loss of vegetation                                                           | A tipper truck spilled some hydraulic oil when the driver was offloading some excavated material at PV2 I8 road on the 08h of July 2025. The driver lifted the truck to off load the material when it was halve way up, he discovered that the body of the truck was swinging to the sides and he tried to stop, and discovered some oil leaks from the hydraulic cylinder, about +-9 litres of oil spilled to the ground and it was reported to the EO, immediately the supervisor and the driver cleaned the spillage and the contaminated soil was collected into bags and taken to ABC Solar Waste management area. | +/- 9L | The spillages were cleaned, and the contaminated soil was removed and stored in bags and taken to waste management area at ABC solar laydown area. |                          |



| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                          | Volume   | Remedial Action                                                                                                                                |                                                                                                  |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                       |          | Immediate Corrective Actions                                                                                                                   | Preventative measures                                                                            |
| 13/08/2025 | Sewage spillage                                                                  | Soil pollution, Loss of vegetation                                         | A pipe from the pump got broken when the driver was reversing and it started to spill approximately 4 liters of sewage water, at PV2 block 15 at 2:18 pm and immediately after noticing the spills, he immediately stopped the car. He immediately cleaned and it was reported to the EO. Proper cleaning was further done by Fidamo's (toilet supplier) team members.                                                                           | +/- 4L   | The spillages were cleaned, and the contaminated soil was removed and stored in bags and taken to waste management centre in Virginia 3.       |                                                                                                  |
| 15/08/2025 | Toilet chemical spillage                                                         | Soil pollution                                                             | Toilet chemical spill at Tower 29. The Toilet Pump burst, and the chemical spilled into the ground contaminating the soil. The Environmental Officer immediately attended to the spill. A drip tray was placed immediately under the Toilet to contain the spillage. The volume of the chemical spill is approximately 4.5liters A spade is used to remove the contaminated soil. The contaminated soil was placed inside a hazardous waste bin. | +/- 4.5L | The spillages were cleaned, and the contaminated soil was removed and stored in bags and taken to waste management area at Ablon laydown area. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 26/08/2025 | Engine oil spillage                                                              | Soil pollution                                                             | A tractor towing a trailer filled with poles experienced an engine malfunction, resulting in the leakage of at least 7 litres of engine oil on                                                                                                                                                                                                                                                                                                   | +/- 7L   | Absorbent material was used to absorb the                                                                                                      | Vehicles that are constantly breaking down                                                       |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Volume  | Remedial Action                                                                                            |                                                                                                  |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |         | Immediate<br>Corrective<br>Actions                                                                         | Preventative<br>measures                                                                         |
|            |                                                                                                 |                                                                                              | the main access road near the MV trenches.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |         | engine oil from the compacted gravel road and later taken for disposal as hazardous waste.                 | must be moved off site                                                                           |
| 09/09/2025 | Toilet chemical spillage                                                                        | Soil pollution                                                                               | A chemical toilet in PV1 block 1 around 9:00 am, 09 September 2025 was reported to be leaking, when the toilet was assessed, it was overfull that resulted in overflowing. An immediate action was taken to clean up the spillage, however during the cleaning process the weather changed we experienced some lightning, and they had to stop. It was about 8-10 litres of chemical water that spilled. Then after lunch the weather was conducive to proceed with work, and they properly cleaned the spillage, and the contaminated soil was collected into | +/- 9L  | The spillage was cleaned, and the contaminated soil was removed and stored in bags, taken to ABC lay down. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 12/09/2025 | Toilet chemical spillage                                                                        | Soil pollution                                                                               | At 10:58 while on the way to use the toilet Wanga witnessed that the toilet is leaking & reported immediately to the HDEC EO.                                                                                                                                                                                                                                                                                                                                                                                                                                  | +/- 10L | Drip trays placed to contain the leakage.                                                                  | The cause of the slippages must be investigated. Toilets that                                    |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                              | Volume | Remedial Action                                                                                   |                                                                                                  |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                        |        | Immediate<br>Corrective<br>Actions                                                                | Preventative<br>measures                                                                         |
|            |                                                                                                 |                                                                                              |                                                                                                                                                                                                                                                                      |        | Absorbent was spread on the area where spill occurred.                                            | continue to leak must be replaced.                                                               |
| 01/10/2025 | Toilet chemical spillage                                                                        | Soil pollution                                                                               | Approximately 8 litres of water and toilet blue mixture was spilled, a drip tray was placed under the toilet however not at the leaking points.                                                                                                                      | +/- 8L | The spillage was cleaned, and the contaminated soil was removed and stored in bags, taken to WMC. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 02/10/2025 | Toilet chemical spillage                                                                        | Soil pollution                                                                               | A pipe from the pump inside the mobile toilet broke and started leaking, which caused a spillage that was discovered by EO. Approximately 10 liters of toilet blue chemical spilled. Upon discovery the service provider was notified and attended to the spillage.  | +/-10L | The spillage was cleaned, and the contaminated soil was removed to WMC.                           | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 03/10/2025 | Hydraulic oil spillage                                                                          | Soil pollution                                                                               | A hydraulic oil pipe on a front-end loader burst, resulting in a spill of nearly 10 liters of hydraulic oil. The operator stopped the equipment, informed the supervisor and put a drip tray beneath the machine. A cleanup was conducted around the machinery while | +/-10L | The spillage was cleaned, and the contaminated soil was removed to WMC.                           | Vehicles that are constantly breaking down must be moved off site                                |

| Date | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                            | Volume | Remedial Action                    |                          |
|------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|--------|------------------------------------|--------------------------|
|      | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                      |        | Immediate<br>Corrective<br>Actions | Preventative<br>measures |
|      |                                                                                                 |                                                                                              | waiting for a mechanic to arrive. Once on site, the mechanic repaired the pipe and then moved the machine to clean the area underneath the loader. |        |                                    |                          |

## **ANNEXURE D – PHOTOGRAPHS**



**Figure 1:** Sensitive/ no go areas must be demarcated.



**Figure 2:** Overcrowded chemical bund.





**Figure 3:** Torn barricade must be recycled.



**Figure 4:** Container that must be emptied.



**Figure 5:** Erected Monopole Tower.



**Figure 6:** Alien vegetation on the stockpiles





**Figure 7:** Groundwater encountered.



**Figure 8:** Alien vegetation being cleared.



**Figure 9:** concrete being mixed on a concrete slab.



**Figure 10:** Concrete being placed on plastic bags.





**Figure 11:** Large quantities of waste stored at the waste area.

**THIS PAGE WAS INTENTIONALLY LEFT BLANK**



---

# ECO MONTHLY ENVIRONMENTAL MONITORING REPORT

Virginia Photo Voltaic (PV) Solar Facility 1, 2 and 3,  
Matjhabeng, Lejweleputswa District Municipality within  
the jurisdiction of the Free State Province.

---

**PREPARED FOR:**

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

Department of Forestry, Fisheries, and the Environment: Compliance Monitoring

**DATED:**

October 2025

**PREPARED BY:**

NCC Operations

**T** • 021 702 2884

**E** • [info@ncc-group.co.za](mailto:info@ncc-group.co.za)

## DECLARATION OF INDEPENDENCE

I, Jennipher Sakaunda, as duly authorised representative of NCC Operations (Pty) Ltd ("**NCC**"), hereby confirm my independence (as well as that of NCC) as an auditor and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which URSA Energy (Pty) Ltd has appointed NCC as Environmental Control Officer ("**ECO**"), other than fair remuneration for work performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'J Sakaunda', is positioned below the 'Signed:' text.

**Jennipher Sakaunda**

03 November 2025

Environmental Control Officer

NCC Operations (Pty) Ltd

## **LIABILITY DISCLAIMER AND CONFIDENTIALITY CLAUSE**

All inspections conducted, as well as reports and recommendations provided by NCC are purely advisory. They are primarily intended for the purpose of assisting clients in loss control, risk management as well as health, safety, and environmental procedures.

Observations and recommendations are the result of practices and conditions observed, and information made available to us in various forms at the time of our visit. They do not purport to refer to or guarantee compliance with local or government regulations which may be applicable to such practices and conditions. This report should not be considered a definitive listing of all existing risks nor an absolute solution to all indicated risks, or hazards present from time to time in the Client Organisation. The report should always be considered in its entirety; individual sentences, paragraphs or sections of the report should not be used in isolation.

This report should not be reproduced except in its entirety, including this liability disclaimer or contents reproduced or disclosed to any third party without the prior written approval of NCC.

NCC assumes no responsibility for any losses incurred as a result of the implementation, management, and operation of recommended health, safety and environmental systems, processes and procedures.

## DOCUMENT CONTROL

|                     |                                             |
|---------------------|---------------------------------------------|
| <b>REPORT TITLE</b> | Monthly ECO Environmental Monitoring Report |
| <b>PROJECT</b>      | Virginia Solar PV 1, 2, 3                   |
| <b>LOCATION</b>     | Free State Province                         |
| <b>EA HOLDER</b>    | URSA Energy (Pty) Ltd                       |
| <b>ECO</b>          | NCC Operations (Pty) Ltd                    |
| <b>REVISION</b>     | 00                                          |
| <b>DATE</b>         | 03/11/2025                                  |

| Revision | Date       | Description                  |
|----------|------------|------------------------------|
| Rev 00   | 03/11/2025 | First Draft - Internal       |
| Rev 01   | TBC        | Final - Authority submission |

## REPORT DISTRIBUTION LIST

| Name                   | Organisation                      | Issued     | Format     |
|------------------------|-----------------------------------|------------|------------|
| Janine Brasington      | Red Rocket South Africa (Pty) Ltd | 03/11/2025 | Electronic |
| Serina Pillay          | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Maggie Logan           | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Director of Compliance | DFFE                              | TBC        | Electronic |



## TABLE OF CONTENTS

|                                                     |           |
|-----------------------------------------------------|-----------|
| <b>TABLE OF FIGURES .....</b>                       | <b>7</b>  |
| <b>ABBREVIATIONS .....</b>                          | <b>8</b>  |
| <b>1 INTRODUCTION .....</b>                         | <b>9</b>  |
| 1.1 Background.....                                 | 9         |
| 1.2 Audit Scope and Purpose.....                    | 11        |
| 1.3 Monitoring Frequency and Reporting.....         | 11        |
| <b>2 AUDITOR BACKGROUND .....</b>                   | <b>12</b> |
| <b>3 GENERAL (NOTABLE EVENTS) .....</b>             | <b>13</b> |
| 3.1 General Outstanding matters.....                | 13        |
| 3.2 Audits (Internal and External).....             | 13        |
| <b>4 WASTE MANAGEMENT .....</b>                     | <b>14</b> |
| 4.1 Domestic/ General Waste.....                    | 14        |
| 4.2 Hazardous waste.....                            | 14        |
| 4.3 Wastewater .....                                | 15        |
| <b>5 PROTECTIVE MEASURES .....</b>                  | <b>16</b> |
| 5.1 General .....                                   | 16        |
| <b>6 ENVIRONMENTAL CONSERVATION .....</b>           | <b>17</b> |
| 6.1 Conservation of Flora and Fauna .....           | 17        |
| 6.2 Water Management.....                           | 17        |
| 6.3 Soil Management .....                           | 17        |
| 6.4 Stormwater and Erosion onsite .....             | 17        |
| <b>7 INFRASTRUCTURE MANAGEMENT .....</b>            | <b>18</b> |
| 7.1 Access Roads.....                               | 18        |
| 7.2 Fences, Gates, and Barricading .....            | 18        |
| 7.3 Buildings and Structures .....                  | 18        |
| <b>8 SOCIAL RESPONSIBILITY .....</b>                | <b>18</b> |
| <b>9 ENVIRONMENTAL AWARENESS AND TRAINING .....</b> | <b>19</b> |
| <b>10 HERITAGE .....</b>                            | <b>19</b> |
| <b>11 WARNING &amp; NCRS .....</b>                  | <b>20</b> |

|           |                                                        |           |
|-----------|--------------------------------------------------------|-----------|
| <b>12</b> | <b>REHABILITATION .....</b>                            | <b>20</b> |
| <b>13</b> | <b>INCIDENTS AND ACCIDENTS .....</b>                   | <b>20</b> |
| <b>14</b> | <b>MEETINGS AND OTHER CORRESPONDANCE.....</b>          | <b>20</b> |
| <b>15</b> | <b>AUDIT METHODOLOGY.....</b>                          | <b>21</b> |
| 15.1      | Audit Process.....                                     | 21        |
| 15.2      | Observation and Recommendation Determination.....      | 22        |
| 15.3      | Findings.....                                          | 22        |
| 15.4      | Audit Tables and Compliance Ratings .....              | 22        |
| <b>16</b> | <b>ASSUMPTIONS AND LIMITATIONS .....</b>               | <b>24</b> |
| <b>17</b> | <b>CONSULTATION PROCESS.....</b>                       | <b>24</b> |
| <b>18</b> | <b>FINDINGS .....</b>                                  | <b>25</b> |
| 18.1      | Minor improvements required. ....                      | 25        |
| 18.2      | Major improvements required.....                       | 25        |
| <b>19</b> | <b>AUDIT SUMMARY.....</b>                              | <b>27</b> |
| <b>20</b> | <b>RECOMMENDATIONS .....</b>                           | <b>28</b> |
| <b>21</b> | <b>CONCLUSION .....</b>                                | <b>28</b> |
|           | <b>ANNEXURE A – CONCERNS/COMPLAINTS REGISTER .....</b> | <b>31</b> |
|           | <b>ANNEXURE B - NCR REGISTER .....</b>                 | <b>31</b> |
|           | <b>ANNEXURE C - INCIDENT REGISTER .....</b>            | <b>32</b> |
|           | <b>ANNEXURE D – PHOTOGRAPHS .....</b>                  | <b>43</b> |

## TABLE OF FIGURES

|                                                          |    |
|----------------------------------------------------------|----|
| Figure 1: Alien vegetation in the no-go area.....        | 44 |
| Figure 2: Alien Vegetation.....                          | 44 |
| Figure 3: Alien Vegetation Establishing .....            | 45 |
| Figure 4: Berms that have been established .....         | 45 |
| Figure 5: Cleared vegetation being moved from site. .... | 46 |
| Figure 6: Topsoil being mixed with subsoil.....          | 46 |
| Figure 7: Poor condition of the access roads.....        | 47 |
| Figure 8: Cleared alien vegetation left onsite. ....     | 47 |
| Figure 9: Open trenches left open unbarricaded. ....     | 48 |
| Figure 10: Portion of the road washed away. ....         | 48 |
| Figure 11: Large quantities of waste on the waste.....   | 49 |
| Figure 12: Stockpile height exceeding 2m. ....           | 49 |

## ABBREVIATIONS

|             |                                                         |
|-------------|---------------------------------------------------------|
| <b>BAR</b>  | Basic Assessment Report                                 |
| <b>CA</b>   | Competent Authority                                     |
| <b>DEA</b>  | Department of Environmental Affairs (now DFFE)          |
| <b>DFFE</b> | Department of Forestry, Fisheries, and the Environment  |
| <b>DWS</b>  | Department of Water and Sanitation                      |
| <b>EA</b>   | Environmental Authorisation                             |
| <b>EAP</b>  | Environmental Assessment Practitioner                   |
| <b>ECO</b>  | Environmental Control Officer                           |
| <b>EIA</b>  | Environmental Impact Assessment                         |
| <b>EMPr</b> | Environmental Management Programme                      |
| <b>EO</b>   | Environmental Officer (Contractor)                      |
| <b>ER</b>   | Employer's Representative                               |
| <b>ESCO</b> | Environmental Site Compliance Officer                   |
| <b>kV</b>   | Kilovolt                                                |
| <b>MVA</b>  | Megavolt Amperes                                        |
| <b>MW</b>   | Megawatt                                                |
| <b>NCC</b>  | NCC Operations                                          |
| <b>NCR</b>  | Non-Compliance Report                                   |
| <b>NEMA</b> | National Environmental Management Act (No. 107 of 1998) |
| <b>NWA</b>  | National Water Act (No. 36 of 1998)                     |
| <b>OHPL</b> | Overhead Power Line                                     |
| <b>SDC</b>  | Safe Disposal Certificate                               |
| <b>SHE</b>  | Safety, Health, and Environment                         |
| <b>SS</b>   | Substation                                              |
| <b>TBC</b>  | To Be Confirmed                                         |

# 1 INTRODUCTION

## 1.1 Background

NCC Operations (Pty) Ltd ("**NCC**") was appointed by URSA Energy (Pty) LTD ("**URSA**") to provide a suitably experienced independent Environmental Control Officer ("**ECO**") for the construction phase of Virginia Solar Park which will be connected to the Eskom Theseus Main Transmission Substation ("**MTS**"). The site is located on Farm Blomskraal 216, Ventersburg RD located within the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province. On completion the facility will consist of the Photovoltaic (PV) Power Plant with a maximum generation capacity up to 100 MW, a 132kV powerline connecting the substation to the Eskom Theseus substation which is located 16.2 km North-East of the north-western corner of project site.

The ECO has the responsibility of ensuring the mitigation/ rehabilitation measures and conditions referred to in the Environmental Authorisation ("**EA**") are implemented, as well as ensuring compliance with the requirements of the Environmental Management Programme ("**EMPr**"). This report provides an insight into the overall compliance performance and a summary of other environmental concerns and potential environmental risks through observations during site inspections.

This report is based on the following environmental conditions or requirements:

- a) Environmental Authorisations
  - 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
  - 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
  - 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)
- b) Environmental Management Programmes
- c) Relevant environmental legislation.
- d) All other environmental permits, licenses, and authorisations.

The notification of commencement of construction was submitted to the DFFE for Virginia Solar Plant (Pty) Ltd on the 02 May 2024.

This report addresses conditions set out in the EA which states the ECO as part of their duties: *"The ECO must keep record of all activities on site, problems identified, transgressions noted, and a task schedule of tasks undertaken by the ECO."* As per the roles and responsibilities in the Virginia Solar Project ("**VSP**") EMPr, the primary role of the ECO will be to monitor the construction activities and ensure that the mitigation measures

of the EMPr and Environmental Authorisations (EA) are implemented. This report also includes an audit checklist for the VSP EA as follows:

- 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
- 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
- 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)

A summary of the various environmental requirements i.e. the audit criteria relating to the overall project is provided in **Table 1**.

**Table 1:** Summary of environmental requirements / criteria relating to the overall project.

| Components of overall project | Environmental requirements / criteria |               |                                |              |
|-------------------------------|---------------------------------------|---------------|--------------------------------|--------------|
|                               | DFFE EA Ref No.                       | Issue date    | Approved EMPr<br>(Compiled by) | Date         |
| Virginia 1 Solar Park         | 14/12/16/3/3/2/2099/1                 | 20 April 2022 | Terramanzi Group (Pty) Ltd     | October 2023 |
| Virginia 2 Solar Park         | 14/12/16/3/3/2/2100                   | 20 May 2022   | Terramanzi Group (Pty) Ltd     | October 2023 |
| Virginia 3 Solar Park         | 14/12/16/3/3/2/2101                   | 20 April 2022 | Terramanzi Group (Pty) Ltd     | October 2023 |

This report represents the monitoring for the Construction Phase. The responsibility of enforcement of the conditions of the EAs and EMPrs lies with the Project and Project Manager, while the Department of Forestry, Fisheries, and the Environment (“**DFFE**”) Environmental Management Inspectorate (“**EMI**”) may also enforce existing and potentially new conditions through compliance notices.

An Environmental Site Compliance Officer (“**ESCO**”) has been appointed by the holder of the EA to monitor the project compliance onsite on a full-time basis on behalf of the EA holder. The responsibilities of the ESCO includes:

- Monitoring conditions of the Basic Assessment Reports (“**BARs**”), Environmental Impact Report (**EIR**) EAs and the EMPrs.
- Ensuring compliance with all relevant environmental legislation.

- Approving method statements (reviewed by the ECO and co-approved by Site Manager).
- Remaining employed until the completion of the construction activities.
- Reporting to the Project Manager, including all findings identified onsite.
- Reporting any significant findings to the ECO.
- Preparing and submitting monthly reports to the ECO and Project Manager.
- Monitoring compliance by the Contractor.

In addition, the ESCO will:

- Undertake daily inspections of the site and surrounding areas.
- Audit compliance with the EMPr and conditions of the environmental authorisation.
- Take appropriate action if the specifications contained in the EMPr and conditions of the environmental authorisation are not followed.
- Monitor and verify that environmental impacts are kept to a minimum, as far as possible; and
- Ensure that activities onsite comply with all relevant environmental legislation.

## 1.2 Audit Scope and Purpose.

In accordance with Regulation 34 of the 2014 NEMA EIA Regulations (as amended) the holder of an environmental authorisation must, for the period during which the EA and EMPr, and where applicable the closure plan, remain valid —

- Ensure that the compliance with the conditions of the EA and the EMPr, and where applicable the closure plan, is audited; and*
- Submit an environmental audit report to the relevant competent authority.*

The purpose of this environmental audit is to verify compliance to the overarching environmental requirements specified as conditions of the EAs and EMPrs, and report on the extent to which the objectives of the EMPrs and are being achieved.

## 1.3 Monitoring Frequency and Reporting.

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 27<sup>th</sup> of October 2025 after which this report was compiled which serves to document and audit. This report covers the monthly reporting for the month of October 2025.

## 2 AUDITOR BACKGROUND

NCC is a multi-disciplinary environmental consulting company based in South Africa which adopts a 'values driven' approach with a common purpose to conserve and create sustainable environments that enable people, planet and business to thrive. We are a trusted partner to major engineering and construction firms, mines, parastatals, film, sports and event production companies, municipalities, provincial and national government, and conservation organisations. Drawing on our years of experience on a wide range of projects, NCC works with our clients to develop, implement, and monitor customised services that add real value.

The auditor, **Jennipher Sakaunda**, is a senior environmental manager with more than 14 years' experience currently employed with NCC. Jennipher Sakaunda has experience in several environmental fields including environmental compliance monitoring and auditing, due diligence assessment, environmental impact and risk assessment, and compilation of environmental management plans/programmes.

**Table 2:** Details of the auditor.

|                       |                                                                                                                                                                                                |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Company</b>        | NCC Operations (Pty) Ltd                                                                                                                                                                       |
| <b>Auditor</b>        | Jennipher Sakaunda                                                                                                                                                                             |
| <b>Tel</b>            | +27 21 702 2884                                                                                                                                                                                |
| <b>Mobile</b>         | +27 69 510 7630                                                                                                                                                                                |
| <b>Email</b>          | <a href="mailto:jenniphers@ncc-group.co.za">jenniphers@ncc-group.co.za</a>                                                                                                                     |
| <b>Address</b>        | 26 Bell Close, Westlake Business Park Westlake, 7945                                                                                                                                           |
| <b>Affiliation</b>    | International Association of Impact Assessment South Africa.<br>Environmental Assessment Practitioner Association of South Africa.<br>South African Council of Natural Scientific Professions. |
| <b>Qualifications</b> | BSc (honors) Environmental Management                                                                                                                                                          |
| <b>Expertise</b>      | A detailed CV can be provided on request.                                                                                                                                                      |



### 3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (October 2025) included the following:

- Construction of the internal road connecting the access road to the Temporary Site Offices (“TSF”) and Switching Station.
- Demobilisation of site offices and laydown area.
- Fencing.
- Clearing and grubbing of PV area and levelling works.
- Drilling and pile installations.
- Reworking of the rain damaged portions of the access road.
- Installation of Solar Panels
- Installation of torque tubes.
- Trench excavation works for cables.
- Establishing permanent berms.

#### 3.1 General Outstanding matters

Any major outstanding matters are to be recorded and summarised in the Concerns Register (**Annexure A**). The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

#### 3.2 Audits (Internal and External)

Internal audits are undertaken monthly by the Red Rocket ESCO. This ECO Audit was undertaken on the 27<sup>th</sup> of October 2025. Audit tables/checklists are attached to this report. The ECO undertakes external monthly audits.

## 4 WASTE MANAGEMENT

The contractor must make provision for waste avoidance, minimisation, and separation of waste where possible through recycling efforts. Waste management awareness must be done on an ongoing basis and must be provided through toolbox talks and awareness posters. A waste station was constructed at V3 where waste is temporarily stored, sorted and recycled. The waste station includes a bund where waste will be stored and various compartments where waste will be sorted into. The contractor has constructed a sump on the waste area where wastewater will collect into. The contractor must ensure that the waste area has a roof to protect waste from weather elements. Recyclables are transported to Mpact for recycling. Large quantities of wood pallets and plastic straps were observed onsite. Waste must be removed from site more frequently to ensure adequate storage space.

### 4.1 Domestic/ General Waste

A total of **8604 kg** of general waste was generated on site in the month of October 2025; **5802 kg** constituting boxing and wooden pallets were recycled. A total of **2802 kg** of waste were disposed at the Matjhabeng Local Municipality waste disposal site. Designated waste areas have been provided at the contractors' main site offices/laydown areas for purposes of temporary storage of waste prior to collection and transfer to the licensed waste facilities. Bins at the laydown area are colour coded for each waste type.

The service providers dispose the general waste at Matjhabeng Local Municipality waste disposal site-Licence number: B33/2/340/21/P8 16/2/7/C404/D2/Z1/P367. Proof of disposal is available on request.

### 4.2 Hazardous waste

Hazardous waste skips are available at the dedicated waste storage area at each of the sub-contractors' site offices/lay down areas. The contractor disposed **4515 kg** of hazardous waste in October 2025. Hazardous waste in form of oil spillages, cement spillages and contaminated soil is kept onsite until there is enough to dispose. . No major spillages have been recorded on site. All standing equipment and trucks must be equipped with drip trays to prevent spillages.

### 4.3 Wastewater

Approximately **111 556.3 L** of sewerage waste was generated on site in the month of October 2025. Chemical toilets and a conservancy tank have been provided onsite. Fewer incidents of spillages from the chemical toilets have been recorded this month an improvement from the previous months. The contractor must ensure these chemical toilets are serviced regularly and drip trays are placed under each toilet.

The General Authorisation that was issued by DWS for the includes the use of a conservancy tank up to a capacity of 50 000 L. The conservancy tank onsite has a capacity of 12 500 L which is below the stipulated GA threshold. The contractor must ensure that this capacity is not exceeded.

The Appointed Service Provider removes sewage and disposes of it at Matjhabeng Local Municipality wastewater treatment facility - Licence No: 10/D4/J/G/2082. Proof of disposal is available onsite. The contractor must ensure the appointed service provider is licenced to provide sewer removal services. With the work being spread out the contractor must ensure ablutions are within walking distance within the areas where people are working.

## 5 PROTECTIVE MEASURES

### 5.1 General

Protective measures have been deployed to mitigate environmental impacts or prevent impacts from occurring which includes:

- Security guards are present on the site, with access control in place.
- Induction training is conducted for all persons working and visiting the site.
- Snake gaiters are provided.
- Spill kits are available on site.
- No-go areas are demarcated and provided with signage.
- Access cards are used to enter and exit the site.
- Rapid alcohol detecting is in place.

## 6 ENVIRONMENTAL CONSERVATION

### 6.1 Conservation of Flora and Fauna

A permit to clear the site and relocate species of concern was received from the Free state Department of Economic, Small Business Development, Tourism and Environmental Affairs. The permit with Ref No. 202306000012649 was issued on 08/06/2023 to pluck protected and unprotected flora.

Clearance of alien vegetation is in progress, however the pace at which the contractor is removing alien vegetation is concerning especially with the onset of rains. Additionally, cleared vegetation is not being removed to landsite, this may result in the alien seed spreading even into the no go areas. The contractor must monitor the newly cleared areas and areas where alien vegetation was removed to ensure alien vegetation does not re-establish.

A bird nest was found on the ground with a chick inside near PV2, the area was barricaded. Truck drivers must be informed through toolbox talks not to drive on the vegetated areas as there could be more bird nests in the area.

### 6.2 Water Management

Approximately **19 m<sup>3</sup>** of water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The GA allows for abstraction of 43 000m<sup>3</sup> annually, the contractor must ensure water abstraction does not exceed the licenced volumes. The contractor also abstracted **2548 m<sup>3</sup>** of water from Sluice 16, another licenced source.

### 6.3 Soil Management

Cleared topsoil must be protected from erosion and alien vegetation establishment. Alien vegetation has established on the stockpiles and must be cleared. On PV2 area topsoil was found to be mixed with spoil material and trucks were driving on topsoil which may result in compaction. The same was noted during last month's audit. Berms that have been developed must be protected from erosion by planting indigenous vegetation. Several oil spillages incidents were recorded during the month of October.

### 6.4 Stormwater and Erosion onsite

Although contractor's Stormwater Management Plan ("**SWMP**") was approved and some measures implemented, erosion and water ponding were observed on the road, laydown areas and the solar fields. The road near PV2 area was washed away by stormwater and must be fixed. The SWMP must be assessed to check if it is aligned with the changes onsite.

## **7 INFRASTRUCTURE MANAGEMENT**

### **7.1 Access Roads**

The project team is using existing farm roads for current construction activities until such time as the project access roads and internal roads have been constructed. Since erosion and water ponding were observed contractor must maintain access roads. Maintenance of the access roads must be done on a regular basis.

### **7.2 Fences, Gates, and Barricading**

The site is fenced with security personnel manning the access gates. Access cards are used to allow entrance to site. Barricading was observed on site, and such should continue to be maintained around all open excavations to prevent potential fauna (wildlife and livestock) incidents. The contractor must ensure trenches for cables on are barricaded at the end of each working day. The contractor is advised to work on small sections at a time to ensure that there is enough material to barricade the open trenches.

### **7.3 Buildings and Structures**

Containers have been established on site by various subcontractors that are being used as offices. Male and female ablution facilities have been provided. Chemical toilets and a conservancy tank are used to manage sewer onsite. The contractor must ensure the bund meets the requirements such as ventilation and capacity as outlined in the EMPr. A waste station has been established at V3. The waste station constitutes a bunded areas for the storage of hazardous waste and varies compartments where waste will be segregated into. A sump was constructed to capture wastewater.

## **8 SOCIAL RESPONSIBILITY**

Any complaints from the public are to be recorded on complaints register maintained by the Contractor whose responsibility it is to track and resolve the complaints/issues that are raised. In addition, a box for receiving internal grievances is present at the main site office facility which allows for project staff to bring to the attention of the project management team any comments and or concerns.

## 9 ENVIRONMENTAL AWARENESS AND TRAINING

The contractor has undertaken Toolbox talks for the month of October 2025 covering the following topics:

- Cement and concrete use
- Stormwater management
- General authorisation
- Housekeeping
- Use of drip trays
- Waste separation
- Topsoil maintenance and management
- Snakes onsite
- Safe smoking practices
- Wildlife safety
- Staff facility management
- Smoking policy
- Alien invasive plants management
- Waste management
- Pouring Cement using a mixer truck
- No use of danger tape onsite

## 10 HERITAGE

In the event of any unknown artefacts being uncovered during construction, the ESCO and Project Manager must be informed immediately who must then instruct work to be stopped in the immediate area and then promptly report the discovery/finding to the ECO, a heritage specialist and the relevant heritage authority to investigate and confirm if such discovery is in fact a heritage artefact of any significance. No activities impacting upon any heritage sites were reported during this reporting period.

A barricade net was placed around the graves near the main gate to ensure the site is not disturbed by trucks moving excess topsoil.

## 11 WARNING & NCRS

No NCR reports were issued by the ECO in the month of October 2025.

## 12 REHABILITATION

No rehabilitation works have commenced during this period, further rehabilitation is expected to occur on the project as and when other works have been completed.

## 13 INCIDENTS AND ACCIDENTS

All environmental related events, incidents and accidents are to be reported directly to the ECO and kept on a central register and included in the monthly report. No environmental incidents that are reportable under Section 30 of the NEMA occurred in October 2025. A register of environmental incidents is attached as **Annexure C**.

## 14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 27<sup>th</sup> of October 2025 with observations documented in this report. Monthly ECO compliance reports are submitted to the Department (**DFFE**) by the ECO.



## 15 AUDIT METHODOLOGY

This section provides an overview of the methods employed in making observations and providing recommendations and conclusions derived from the audit procedures undertaken.

### 15.1 Audit Process

The site visit, data reviews and report drafting were undertaken by the ECO/auditor. The audit included the following procedures:

- **Site Inspections.** The areas and aspects covered during the inspections with concurrent discussions with the ESCO and site-based representatives of the EA holder included *inter alia*:
  - i. Access control to the sites.
  - ii. Ecologically sensitive areas, where applicable.
  - iii. Waste management.
  - iv. Incident and complaints management.
  - v. Landowner relations.
  - vi. Infrastructure management.
  - vii. Environmental Awareness.
  - viii. Record-keeping and document control.
  - ix. Stormwater and Erosion management
- **Documentation review.** This included:
  - i. A review of the EAs, EMPs and where applicable, method statements.
  - ii. A review of previous audit reports, records, observations, and findings.
  - iii. A review of any remedial and/or protective measures implemented.
  - iv. Identification, if applicable, any gaps requiring action and/or rectification.
- **Audit Report compilation.** This included:
  - i. Recording any observations and findings identified during the audit.
  - ii. Providing recommendations relating to improvement or non-compliance, if and where applicable.

## 15.2 Observation and Recommendation Determination

Observations and subsequent recommendations were based on and are limited to the following:

- i. Available documentation and records viewed or received prior, subsequent, or during the site visit.
- ii. Observations made during the period that the ECO/auditor was on site; and
- iii. Information received from both direct and cross-referenced discussions with permanent site-based staff.

## 15.3 Findings

Any key findings highlighted in this report will indicate areas and/or aspects that require improvement or rectification. The purpose of summarising the findings is to allow the EA holder to identify common management challenges that effect the level of compliance to the conditions of the EAs and EMPrs.

Where findings and recommendations pertaining are deemed significant through compliance status or performance, they are documented as specific issues in the report. All site-specific observations are recorded in the corresponding audit checklist tables.

## 15.4 Audit Tables and Compliance Ratings

The audit table captures observations and recommendations made in relation to the conditions stipulated in the EAs and EMPrs. It provides the reader with more detailed information in terms of what the stipulated requirements are in relation to the organisation's assessed current compliance status, according to the observations recorded by the auditor.

Ratings are calculated based on a scoring system whereby each auditable condition is provided with a score as highlighted in **Table 3** below.

**Table 4:** Compliance rating and scoring.

| Status                              | Compliance Rating |         | Description                                                                                                                                                                                |
|-------------------------------------|-------------------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | Abbreviation      | Scoring |                                                                                                                                                                                            |
| <i>Compliant</i>                    | C                 | 2       | <i>No improvements required</i>                                                                                                                                                            |
| <i>Partially Compliant</i>          | PC                | 1       | <i>Minor improvements required</i>                                                                                                                                                         |
| <i>Non-Compliant</i>                | NC                | 0       | <i>Major improvements required</i>                                                                                                                                                         |
| <i>Work in Progress</i>             | WiP               | -       | <i>Environmental management measures are underway but not yet fully implemented or verified, requiring further monitoring and assessment.</i>                                              |
| <i>Not Applicable / Not Audited</i> | NA                | -       | <i>No improvements required and / or the condition is either not, not yet or no longer relevant at the time of the audit</i>                                                               |
| <i>Informative</i>                  | info              | -       | <i>These relate to informative elements that provide either useful information or are descriptive in the explanation and understanding of statements or concepts in the audit criteria</i> |

Each condition has been ascribed a colour-coded status indicator of Compliant (green), Partially Compliant (orange), major-compliant (red), Not Auditable/Audited (grey), Work in Progress (light red) and Informative (blank/white) to assist the reader in determining aspects that require attention to improve on compliance achieved, if and where applicable. No compliance scoring is attributed any of the audit criteria information pertaining to the following three audit status symbols, namely 'NA', 'WiP', and 'info' as they were either not auditable and/or were not applicable/relevant at the time the audit was undertaken. In other words, they are excluded from the overall compliance rating calculations.

An overall compliance rating is calculated as a percentage to provide the reader with an overview of compliance to the relevant audit criteria however each condition should be considered on its own merits as the ratings do not necessarily portray the severity or impact of the reported finding relating to a condition.

## 16 ASSUMPTIONS AND LIMITATIONS

The ECO compliance audit and associated report are based upon the assumptions that:

- i. Documentation provided to the ECO/auditor is factual and true.
- ii. The audit is based purely on the conditions as stipulated in the EAs and EMPs.
- iii. The construction phase is currently underway and operational phase activities are not applicable.
- iv. Documentation / reports were randomly sampled / reviewed in order to accommodate time constraints.
- v. Where visual observations were not possible either due to physical access constraints or safety constraints, the ECO/auditor used other means to determine compliance, either through requesting written evidence provided by contractors / service providers who service the site or via interviews with technical site-based staff.

## 17 CONSULTATION PROCESS

The approach of consultation followed during the environmental audit was based on written (email) and telephonic correspondence between the ECO/auditor and the Environmental Site Compliance Officer which also includes consultation and communication with the EA holder and competent authority in terms of report submission.

## 18 FINDINGS

Findings are listed in the attached checklists, and it should be noted that findings should be considered individually in the context of the full audit and each condition and associated rating.

The following findings were noted onsite:

- Clearance of alien vegetation partly done on the cleared areas and stockpiles.
- Alien vegetation has established on the no-go areas.
- Water ponding was observed on the trenches and roads.
- Sign of erosion were observed on the roads and the cleared areas.
- Topsoil is being mixed with spoil material.
- Some trenches were observed as not being barricaded.
- Cleared vegetation is not being removed to the landfill site on time.
- Stockpile heights are exceeding 2m.
- Machinery standing with on drip trays.
- Chemical bunds are not equipped with oil separators.
- New permanent berms have been established.

Based on the outcomes of the audit it was established that the objectives of the EAs and EMPs were achieved in terms of:

- i. *Sufficiently providing for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis.*
- ii. *Ensuring compliance with the provisions of environmental authorisation and EMPs.*

### 18.1 Minor improvements required.

- Use drip trays on all standing equipment.
- Remove cleared alien to the landfill site.
- Maintain stockpiles height below 2m.

### 18.2 Major improvements required.

- Clearance of alien vegetation must be done on all affected areas.

- Road maintenance must be done.
- Waste must be removed more frequently onsite.
- Install draining systems and oil separators on the chemical bunds.
- All trenches must be barricaded.
- Stormwater measures must be implemented.
- Waste must be moved timeously.

## 19 AUDIT SUMMARY

In terms of the findings and results of the **October 2025** ECO audit, the project achieved an overall **97.16% compliance** rating with the conditions of the EAs and EMPs.

**Table 4:** Compliance Scoring

| No.                                       | Audit criteria                                                                             | Compliant (C) | Partially Compliant (PC) | Major-non-Compliant (NC) | Work in Progress | Normative (info) | Not Applicable / Not Audited (NA) | Percentage Score      |
|-------------------------------------------|--------------------------------------------------------------------------------------------|---------------|--------------------------|--------------------------|------------------|------------------|-----------------------------------|-----------------------|
| 1                                         | Environmental Authorisation for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1) | 24            | 1                        | 0                        | 1                | 20               | 2                                 | (98%)                 |
| 2                                         | Environmental Authorisation for Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)   | 24            | 1                        | 0                        | 1                | 20               | 2                                 | (98%)                 |
| 3                                         | Environmental Authorisation for Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)   | 24            | 1                        | 0                        | 1                | 20               | 2                                 | (98%)                 |
| 4                                         | EMPr for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)                        | 254           | 22                       | 0                        | 0                | 15               | 29                                | (96%)                 |
| 5                                         | EMPr Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)                              | 252           | 24                       | 0                        | 0                | 16               | 28                                | (96%)                 |
| 6                                         | EMPr Virginia 3 Solar Park (DFFE REF NO: 14/12/16/3/3/2/2101)                              | 228           | 13                       | 0                        | 0                | 43               | 39                                | (97%)                 |
| Overall total no. conditions              |                                                                                            | 806           | 52                       | 0                        | 3                | 134              | 102                               |                       |
| Audited conditions                        |                                                                                            | 1612          | 52                       | 0                        | -                | -                | -                                 | (Potential max score) |
| Overall Compliance Rating Calculation (%) |                                                                                            | 97.16%        |                          |                          |                  |                  |                                   |                       |

## 20 RECOMMENDATIONS

**Based on the findings identified the following is recommended:**

- Alien vegetation clearance must continue onsite; more resources must be allocated towards alien vegetation removal.
- Contractor to monitor newly cleared areas for alien vegetation establishment,
- All trenches must be barricaded at the end of each working day.
- All equipment must be equipped with a drip tray.
- Truck drivers must be trained on handling topsoil.
- Cleared alien vegetation must be taken to the landfill.
- Road must be maintained to correct the effects of erosion and water ponding.
- Stormwater measures must be implemented, measures to be implement must align with the current conditions onsite.
- Drip trays must be used on all standing equipment including trucks waiting to be onboarded. .
- Waste must be removed from the waste area more frequently to prevent overstocking the waste area.
- Stockpile height must be maintained below 2m.
- Toolbox tool to encourage driver to use established roads to prevent disturbing birds that could be nesting in this season.
- To ensure berms are protected from erosion indigenous vegetation must be planted.

## 21 CONCLUSION

The contractor must ensure that systems and resources to monitor and manage environmental risks and impacts adequately are in place. Resources and personnel to train employees on the contents of the EMPs must be made to ensure that the project runs effectively and efficiently with minimal impact to the biophysical and socio-economic environment.

In general, the EMPs are effective in their current format in terms of content and relevance and there are no major shortcomings. The EMP's sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with this project.





**PREPARED BY:**

A handwritten signature in black ink, appearing to read 'Sakaunda'.

**Sakaunda Jennipher**

Environmental Control Officer

NCC Operations (Pty) Ltd

**M** ·069 510 7630

**E** · [jenniphers@ncc-group.co.za](mailto:jenniphers@ncc-group.co.za)

**REVIEWED BY:**

A handwritten signature in black ink, appearing to read 'Nick Gates'.

**Nick Gates**

Senior Environmental Consultant

NCC Operations (Pty) Ltd

**M** ·073 1998 431

**E** ·[nickg@ncc-group.co.za](mailto:nickg@ncc-group.co.za)

## ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

### Open Concerns/Complaint

| No | Observation date | Concern/Complaint | Suggested Due Date <sup>1</sup> | Proposed Corrective Action | Status | Closure status |
|----|------------------|-------------------|---------------------------------|----------------------------|--------|----------------|
|    |                  |                   |                                 |                            |        |                |

*\*The concerns register is updated once the ECO is present on site.*

### Closed Concerns

| No | Observation date | Concern/Complaint | Due Date suggested by ECO | Corrective Action Taken | Outcome | Closure status |
|----|------------------|-------------------|---------------------------|-------------------------|---------|----------------|
|    |                  |                   |                           |                         |         |                |
|    |                  |                   |                           |                         |         |                |

## ANNEXURE B - NCR REGISTER

| Ref No. | Originator | Dated Issued | Description | Proposed Corrective Action | Closure Status | Closure Date | Further Action Required |
|---------|------------|--------------|-------------|----------------------------|----------------|--------------|-------------------------|
|         |            |              |             |                            |                |              |                         |

## ANNEXURE C - INCIDENT REGISTER

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                       | Volume                               | Remedial Action                                              |                                                                                |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                    |                                      | Immediate Corrective Actions                                 | Preventative measures                                                          |
| 20/03/2025 | Waste water                                                                      | Soil pollution                                                             | On 20, 2025, at approximately 8:28, the conservative tank being used to collect wastewater from conservancy tank had overfilled, and a Spillage had occurred spillage of approximately 8-10 litres of wastewater mixed with the cleaning material. the toilet supplier attended to the spill immediate & initiated spill Clean-up. Contaminated soil was taken to the hazardous waste skip.   | 10 l<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified. | The conservancy tank must be emptied more frequently to reduce overfilling.    |
| 19/03/2025 | Waste water                                                                      | Soil pollution                                                             | Approximately 12 litres of wastewater mixed with the cleaning chemicals where toilets are located. The toilet had been leaking since the previous day and wastewater was contained in a drip tray. The toilet supplier was notified, and he came to service<br><br>The toilets; however, during servicing; the drip tray spilled over causing the spillage of the wastewater onto the ground. | 12l<br>(below Section 30 threshold)  | Clean- up must be done as soon as the spills are identified. | Leaking toilets must not be allowed onsite.                                    |
| 08/03/2025 | Diesel spillage                                                                  | Soil pollution                                                             | On 08 March 2025 at 05:30, security supervisor discovered a diesel leakage during the morning patrol. The spillage occurred due to the diesel injectors that were                                                                                                                                                                                                                             | 20l<br>(below Section 30 threshold)  | Clean- up must be done as soon as the spills are identified  | Vehicles must be maintained regular. only road worthy vehicles must be onsite. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                 | Volume                                   | Remedial Action                                             |                                                                                |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                              |                                          | Immediate Corrective Actions                                | Preventative measures                                                          |
|            |                                                                                  |                                                                            | loose one of them was not properly fitted and diesel pressure removed them while the bakkie was in motion.                                                                                                                                                                                                                                                              |                                          |                                                             |                                                                                |
| 07/03/2025 | Water and antifreeze                                                             | Soil pollution                                                             | The Driver parked the minibus on site, shortly a leak observed containing a mixture of water and antifreeze, while also exhibiting signs of overheating.                                                                                                                                                                                                                | -                                        | Clean- up must be done as soon as the spills are identified | Vehicles must be maintained regular. only road worthy vehicles must be onsite. |
| 06/05/2025 | Water mixed with antifreeze spillage                                             | Soil pollution                                                             | On 6 May 2025 at 14:00, the TLB Operator was busy moving spoil material near the access road to the allocated spoil Stockpile area, when the TLB, radiator fan belt snapped & the container that stores water & antifreeze busted. Approximately 5 Liters of water with antifreeze spilled                                                                              | 5 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.                  |
| 08/05/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | A chemical toilet in PV3 at the laydown area at around 3:53 pm, 08 May 2025 was reported to be leaking, when the toilet was assessed, it was identified that there was a broken pipe that leaked the chemical water. An immediate action was taken to clean up the spillage. The contaminated soil was collected into the bags and taken to site waste management area. | 6 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent.         |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                   | Volume                                   | Remedial Action                                             |                                                                        |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                |                                          | Immediate Corrective Actions                                | Preventative measures                                                  |
| 12/05/2025 | Diesel spillage                                                                  | Soil pollution                                                             | On 12-05-2025 at 06:40, the ambulance was on the way to the access control point along the main access road, when it had a sudden breakdown and diesel was spilled along the access road, leaving a trail of diesel spill for approximately +400 Metres. Approximately +2 Litres of diesel was spilled                                                                                                                                                    | 2 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.          |
| 15/05/2025 | Hydraulic oil spillage                                                           | Soil pollution                                                             | On the 15/05/2025, a side tipper truck was transporting spoil material when the cylinder failed and spilled ~7 litres of hydraulic oil, about 455m from the nearest watercourse. The contaminated soil was promptly cleaned up.                                                                                                                                                                                                                           | 7 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.          |
| 20/05/2025 | Toilet Cleaner mixed with water spillage                                         | soil pollution                                                             | It was around 11:30 am when it was reported that there was a spillage, that when the Fidamo team was about to clean the toilets at Pv1 Laydown area, a pipe from the generator busted and the water leaked from the broken pipe. The water that spilled was approximately 3-4 Liters and the pipe was immediately stopped. The chemical that was in the water is blue splash Toilet chemical. An immediate action was taken to clean up the spillage. The | 4 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                 | Volume                                                                 | Remedial Action                                                                                            |                                                                                                               |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                              |                                                                        | Immediate Corrective Actions                                                                               | Preventative measures                                                                                         |
|            |                                                                                  |                                                                            | contaminated soil was collected into the bags and taken to site waste management area.                                                                                                                                                                                                                                                                                                                                  |                                                                        |                                                                                                            |                                                                                                               |
| 21/05/2025 | Fauna                                                                            | Loss of biodiversity                                                       | On the 21/05/2025 a snake was fatally wounded during the internal road construction works.                                                                                                                                                                                                                                                                                                                              | N/A                                                                    | The dead animal was buried.                                                                                | N/A                                                                                                           |
| 26/05/2025 | Hydraulic oil spillage                                                           | Soil pollution                                                             | On 26/05/2025, at around 16:50 a drill rig operator noticed a leak from the machine, he immediately reported the leak to the supervisor. The supervisor called the mechanic but did not report the spillage. The oil further spilled to the soil during the repair attempts which were done under poor lighting. The spillage was left overnight and was only reported to the EO the next morning when the shift began. | 25 litres<br>(below Section 30 threshold)                              | Clean- up must be done as soon as the spills are identified.                                               | The ESCO issued NCR to the subcontractor for failing to report spillage immediately.                          |
| 11/06/2025 | Concrete and oil Spillage                                                        | Soil pollution                                                             | On the 11 <sup>th</sup> of June 2025 the concrete mixer truck overturned resulting in the spillage of an estimated 3m3 (3 cubic meters) of concrete and approximately 8litres of diesel. The contractor removed the spilled concrete and dumped it on the natural area adjacent to the road                                                                                                                             | 8 litres of diesel and 3m3 of concrete<br>(below Section 30 threshold) | Clean- up must be done as soon as possible and an investigation must be done on the cause of the accident. | The ESCO issued an NCR to the subcontractor for failing to report dumping concrete on the natural vegetation. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                             | Volume                                 | Remedial Action                                                                                     |                                                                                                  |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|-----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                          |                                        | Immediate Corrective Actions                                                                        | Preventative measures                                                                            |
| 16/06/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | At 08:32am, on the 16th of June 2025, The Client (Robin) reported that ABLON's Ablution facilities were leaking which resulted to soil contamination, we immediately stopped everyone from using the Toilet and reported the issue to our service provider. A drip tray was placed immediately underneath the toilet. The event occurred at the OHL Site Camp and the name of the chemical that spilled on the ground is Portabloo Toilet Chemical. | 30 litres (below Section 30 threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 24/06/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | At around 8 am on the 24/06/2025 a spillage was reported by the contractor. Approximately 30 litres of Toilet Blue was spilled at the Virginia 1 laydown area. The spillage was cleaned up and the contaminated soil removed for disposal.                                                                                                                                                                                                          | 30 litres (below Section 30 threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 08/07/2025 | Hydraulic Oil Spillage                                                           | Soil pollution                                                             | A tipper truck spilled some hydraulic oil when the driver was offloading some excavated material at PV2 I8 road on the 08h of July 2025. The driver lifted the truck to off load the material when it was half way up, he discovered that the body of the truck was swinging to the sides and he tried to stop, and discovered some oil                                                                                                             | 30 litres (below Section 30 threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin. | Vehicles that are constantly breaking down must be moved off site.                               |



| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Volume | Remedial Action                                                                                                                                    |                                                                    |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |        | Immediate Corrective Actions                                                                                                                       | Preventative measures                                              |
|            |                                                                                  |                                                                            | leaks from the hydraulic cylinder, about +-9 litres of oil spilled to the ground and it was reported to the EO, immediately the supervisor and the driver cleaned the spillage and the contaminated soil was collected into bags and taken to ABC Solar Waste management area.                                                                                                                                                                                                                                                                                                                                          |        |                                                                                                                                                    |                                                                    |
| 08/07/2025 | Hydraulic Oil Spillage                                                           | Soil pollution, Loss of vegetation                                         | A tipper truck spilled some hydraulic oil when the driver was offloading some excavated material at PV2 I8 road on the 08h of July 2025. The driver lifted the truck to off load the material when it was halve way up, he discovered that the body of the truck was swinging to the sides and he tried to stop, and discovered some oil leaks from the hydraulic cylinder, about +-9 litres of oil spilled to the ground and it was reported to the EO, immediately the supervisor and the driver cleaned the spillage and the contaminated soil was collected into bags and taken to ABC Solar Waste management area. | +/-9L  | The spillages were cleaned, and the contaminated soil was removed and stored in bags and taken to waste management area at ABC solar laydown area. | Vehicles that are constantly breaking down must be moved off site. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                          | Volume   | Remedial Action                                                                                                                                |                                                                                                  |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                       |          | Immediate Corrective Actions                                                                                                                   | Preventative measures                                                                            |
| 13/08/2025 | Sewage spillage                                                                  | Soil pollution, Loss of vegetation                                         | A pipe from the pump got broken when the driver was reversing and it started to spill approximately 4 liters of sewage water, at PV2 block 15 at 2:18 pm and immediately after noticing the spills, he immediately stopped the car. He immediately cleaned and it was reported to the EO. Proper cleaning was further done by Fidamo's (toilet supplier) team members.                                                                           | 4        | The spillages were cleaned, and the contaminated soil was removed and stored in bags and taken to waste management centre in Virginia 3.       | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 15/08/2025 | Toilet chemical spillage                                                         | Soil pollution                                                             | Toilet chemical spill at Tower 29. The Toilet Pump burst, and the chemical spilled into the ground contaminating the soil. The Environmental Officer immediately attended to the spill. A drip tray was placed immediately under the Toilet to contain the spillage. The volume of the chemical spill is approximately 4.5liters A spade is used to remove the contaminated soil. The contaminated soil was placed inside a hazardous waste bin. | +/- 4.5L | The spillages were cleaned, and the contaminated soil was removed and stored in bags and taken to waste management area at Ablon laydown area. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 26/08/2025 | Engine oil spillage                                                              | Soil pollution                                                             | A tractor towing a trailer filled with poles experienced an engine malfunction, resulting in the leakage of at least 7 litres of engine oil on the main access road near the MV trenches.                                                                                                                                                                                                                                                        | +/- 7L   | Absorbent material was used to absorb the engine oil from the compacted gravel road and later taken for                                        | Vehicles that are constantly breaking down must be moved off site                                |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Volume  | Remedial Action                                                                                            |                                                                                                  |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |         | Immediate<br>Corrective<br>Actions                                                                         | Preventative<br>measures                                                                         |
|            |                                                                                                 |                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |         | disposal as<br>hazardous waste.                                                                            |                                                                                                  |
| 09/09/2025 | Toilet chemical<br>spillage                                                                     | Soil pollution                                                                               | A chemical toilet in PV1 block 1 around 9:00 am, 09 September 2025 was reported to be leaking, when the toilet was assessed, it was overfull that resulted in overflowing. An immediate action was taken to clean up the spillage, however during the cleaning process the weather changed we experienced some lightning, and they had to stop. It was about 8-10 litres of chemical water that spilled. Then after lunch the weather was conducive to proceed with work, and they properly cleaned the spillage, and the contaminated soil was collected into | +/- 9L  | The spillage was cleaned, and the contaminated soil was removed and stored in bags, taken to ABC lay down. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 12/09/2025 | Toilet chemical<br>spillage                                                                     | Soil pollution                                                                               | At 10:58 while on the way to use the toilet Wanga witnessed that the toilet is leaking & reported immediately to the HDEC EO.                                                                                                                                                                                                                                                                                                                                                                                                                                  | +/- 10L | Drip trays placed to contain the leakage. Absorbent was spread on the area where spill occurred.           | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |

| Date       | Type                                                                                           | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                 | Volume  | Remedial Action                                                                                   |                                                                                                  |
|------------|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|---------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna &Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                                                                           |         | Immediate<br>Corrective<br>Actions                                                                | Preventative<br>measures                                                                         |
| 01/10/2025 | Toilet chemical<br>spillage                                                                    | Soil pollution                                                                               | Approximately 8 litres of water and toilet blue mixture was spilled, a drip tray was placed under the toilet however not at the leaking points.                                                                                                                                                                                                                                                                         | +/- 8L  | The spillage was cleaned, and the contaminated soil was removed and stored in bags, taken to WMC. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 02/10/2025 | Toilet chemical<br>spillage                                                                    | Soil pollution                                                                               | A pipe from the pump inside the mobile toilet broke and started leaking, which caused a spillage that was discovered by EO. Approximately 10 liters of toilet blue chemical spilled. Upon discovery the service provider was notified and attended to the spillage.                                                                                                                                                     | +/- 10L | The spillage was cleaned, and the contaminated soil was removed to WMC.                           | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 03/10/2025 | Hydraulic oil<br>spillage                                                                      | Soil pollution                                                                               | A hydraulic oil pipe on a front-end loader burst, resulting in a spill of nearly 10 liters of hydraulic oil. The operator stopped the equipment, informed the supervisor and put a drip tray beneath the machine. A cleanup was conducted around the machinery while waiting for a mechanic to arrive. Once on site, the mechanic repaired the pipe and then moved the machine to clean the area underneath the loader. | +/- 10L | The spillage was cleaned, and the contaminated soil was removed to WMC.                           | Vehicles that are constantly breaking down must be moved off site                                |
| 13/10/2025 | Toilet chemical<br>spillage                                                                    | Soil pollution                                                                               | The pump had a fault and stopped working which resulted in the Blue chemical spillage to the ground. Approximately 8 liters of                                                                                                                                                                                                                                                                                          | +/- 8L  | Drip trays placed to contain the leakage. Absorbent was spread on the                             | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Volume   | Remedial Action                                                                                                                                                                                               |                                                                   |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |          | Immediate Corrective Actions                                                                                                                                                                                  | Preventative measures                                             |
|            |                                                                                  |                                                                            | Toilet Blue Chemical spilled. Upon discovery the service provider was notified and attended to the spillage.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |          | area where spill occurred.                                                                                                                                                                                    |                                                                   |
| 21/10/2025 | Hydraulic oil spillage                                                           | Soil pollution                                                             | On the 21/10/2025 the Operator inspected his machine while completing his checklist, and everything was fine with no leaks, it was around 9:00 am, he removed the drip tray under the drilling machine and started the machine to warm up. When he released the rev-count the assistant operator from the machine that I was close to him called trying to make him aware that the machine was leaking, then he stopped the machine immediately switched off and saw the machine leaking, he put back the drip tray to collect the hydraulic oil unfortunately the oil had already gushed out, it was about 20-25 liters of hydraulic oil. When he checked the machine again, he found out that the hydraulic pipe has disjoined. Then reported to the safety officer on site. | 20 -25 L | Immediately the spillage was contained, absorbent and pillows were used to contain the spillage. A TLB was used to clean up the contaminated soil and loaded in a skip bin and taken to waste management area | Vehicles that are constantly breaking down must be moved off site |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Volume | Remedial Action                                                                                                                                                                                                                                                                                                                                                                                           |                                                                    |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How,<br>Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |        | Immediate<br>Corrective<br>Actions                                                                                                                                                                                                                                                                                                                                                                        | Preventative<br>measures                                           |
| 24/10/2025 | Diesel spillage                                                                                 | Soil pollution                                                                               | On 23 October 2025, at approximately 10:52, an environmental incident occurred at PV3 Raubex Infra laydown area involving a diesel spill. The spill resulted from a fault in the site generator, which led to the release of diesel into the ground surface which was about 9l. The contaminated soil was disposed of to a hazardous waste skip at the Waste management facility at PV3. All necessary steps were taken to ensure the spill was contained and cleaned up efficiently, minimizing potential harm to the surrounding environment. | 9 L    | Immediate action was taken to contain the spill using spill kit absorbents available on site. The incident was promptly reported to the Construction Manager and Environmental Officer. To mitigate further environmental impact, a TLB (Tractor-Loader-Backhoe) was dispatched to assist with the cleanup. The contaminated soil was collected and placed into black bags designated for hazardous waste | Vehicles that are constantly breaking down must be moved off site. |

## **ANNEXURE D – PHOTOGRAPHS**





**Figure 1:** Alien vegetation in the no-go area.



**Figure 2:** Alien Vegetation.





**Figure 3:** Alien Vegetation Establishing



**Figure 4:** Berms that have been established



**Figure 5:** Cleared vegetation being moved from site.



**Figure 6:** Topsoil being mixed with subsoil





**Figure 7:** Poor condition of the access roads



**Figure 8:** Cleared alien vegetation left onsite.



**Figure 9:** Open trenches left open unbarricaded.



**Figure 10:** Portion of the road washed away.





**Figure 11:** Large quantities of waste on the waste



**Figure 12:** Stockpile height exceeding 2m.

**THIS PAGE WAS INTENTIONALLY LEFT BLANK**

**NOVEMBER 2025**



---

# ECO MONTHLY ENVIRONMENTAL MONITORING REPORT

Virginia OPHL Line and Switching Station Matjhabeng,  
Lejweleputswa District Municipality within the jurisdiction  
of the Free State Province.

---

**PREPARED FOR:**

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

Department of Forestry, Fisheries, and the Environment: Compliance Monitoring

**DATED:**

November 2025

**PREPARED BY:**

NCC Operations

**T** • 021 702 2884

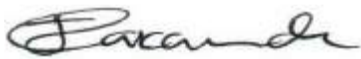
**E** • [info@ncc-group.co.za](mailto:info@ncc-group.co.za)



## DECLARATION OF INDEPENDENCE

I, Jennipher Sakaunda, as duly authorised representative of NCC Operations (Pty) Ltd ("**NCC**"), hereby confirm my independence (as well as that of NCC) as an auditor and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which URSA Energy (Pty) Ltd has appointed NCC as Environmental Control Officer ("**ECO**"), other than fair remuneration for work performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'J Sakaunda', is positioned below the 'Signed:' text.

**Jennipher Sakaunda**

03 December 2025

Environmental Control Officer

NCC Operations (Pty) Ltd

## **LIABILITY DISCLAIMER AND CONFIDENTIALITY CLAUSE**

All inspections conducted, as well as reports and recommendations provided by NCC are purely advisory. They are primarily intended for the purpose of assisting clients in loss control, risk management as well as health, safety, and environmental procedures.

Observations and recommendations are the result of practices and conditions observed, and information made available to us in various forms at the time of our visit. They do not purport to refer to or guarantee compliance with local or government regulations which may be applicable to such practices and conditions. This report should not be considered a definitive listing of all existing risks nor an absolute solution to all indicated risks, or hazards present from time to time in the Client Organisation. The report should always be considered in its entirety; individual sentences, paragraphs or sections of the report should not be used in isolation.

This report should not be reproduced except in its entirety, including this liability disclaimer or contents reproduced or disclosed to any third party without the prior written approval of NCC.

NCC assumes no responsibility for any losses incurred as a result of the implementation, management, and operation of recommended health, safety and environmental systems, processes and procedures.

## DOCUMENT CONTROL

|                     |                                             |
|---------------------|---------------------------------------------|
| <b>REPORT TITLE</b> | Monthly ECO Environmental Monitoring Report |
| <b>PROJECT</b>      | Virginia OPL Line and Switching Station     |
| <b>LOCATION</b>     | Free State Province                         |
| <b>EA HOLDER</b>    | URSA Energy (Pty) Ltd                       |
| <b>ECO</b>          | NCC Operations (Pty) Ltd                    |
| <b>REVISION</b>     | 00                                          |
| <b>DATE</b>         | 03/12/2025                                  |

| Revision | Date       | Description                  |
|----------|------------|------------------------------|
| Rev 00   | 03/12/2025 | First Draft - Internal       |
| Rev 01   | TBC        | Final - Authority submission |

## REPORT DISTRIBUTION LIST

| Name                   | Organisation                      | Issued     | Format     |
|------------------------|-----------------------------------|------------|------------|
| Janine Brasington      | Red Rocket South Africa (Pty) Ltd | 03/12/2025 | Electronic |
| Tarryn Frankland       | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Maggie Logan           | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Director of Compliance | DFFE                              | TBC        | Electronic |

## TABLE OF CONTENTS

|                                                   |           |
|---------------------------------------------------|-----------|
| <b>TABLE OF FIGURES .....</b>                     | <b>7</b>  |
| <b>ABBREVIATIONS .....</b>                        | <b>8</b>  |
| <b>1 INTRODUCTION .....</b>                       | <b>9</b>  |
| 1.1 Background.....                               | 9         |
| 1.2 Audit Scope and Purpose.....                  | 11        |
| 1.3 Monitoring Frequency and Reporting.....       | 11        |
| <b>2 AUDITOR BACKGROUND.....</b>                  | <b>12</b> |
| <b>3 GENERAL (NOTABLE EVENTS) .....</b>           | <b>13</b> |
| 3.1 General Outstanding matters.....              | 13        |
| 3.2 Audits (Internal and External).....           | 13        |
| <b>4 WASTE MANAGEMENT.....</b>                    | <b>14</b> |
| 4.1 Domestic/ General Waste.....                  | 14        |
| 4.2 Hazardous waste.....                          | 14        |
| 4.3 Wastewater .....                              | 15        |
| <b>5 PROTECTIVE MEASURES .....</b>                | <b>15</b> |
| 5.1 General .....                                 | 15        |
| <b>6 ENVIRONMENTAL CONSERVATION.....</b>          | <b>16</b> |
| 6.1 Conservation of Flora and Fauna.....          | 16        |
| 6.2 Water Management.....                         | 16        |
| 6.3 Soil Management .....                         | 16        |
| 6.4 Stormwater and Erosion onsite .....           | 16        |
| <b>7 INFRASTRUCTURE MANAGEMENT.....</b>           | <b>17</b> |
| 7.1 Access Roads.....                             | 17        |
| 7.2 Fences, Gates, and Barricading.....           | 17        |
| 7.3 Buildings and Structures .....                | 17        |
| <b>8 SOCIAL RESPONSIBILITY.....</b>               | <b>17</b> |
| <b>9 NVIRONMENTAL AWARENESS AND TRAINING.....</b> | <b>18</b> |
| <b>10 HERITAGE.....</b>                           | <b>18</b> |
| <b>11 WARNING &amp; NCRS.....</b>                 | <b>18</b> |

|           |                                                        |           |
|-----------|--------------------------------------------------------|-----------|
| <b>12</b> | <b>REHABILITATION .....</b>                            | <b>19</b> |
| <b>13</b> | <b>INCIDENTS AND ACCIDENTS .....</b>                   | <b>19</b> |
| <b>14</b> | <b>MEETINGS AND OTHER CORRESPONDANCE.....</b>          | <b>19</b> |
| <b>15</b> | <b>AUDIT METHODOLOGY.....</b>                          | <b>20</b> |
| 15.1      | Audit Process.....                                     | 20        |
| 15.2      | Observation and Recommendation Determination.....      | 21        |
| 15.3      | Findings.....                                          | 21        |
| 15.4      | Audit Tables and Compliance Ratings.....               | 21        |
| <b>16</b> | <b>ASSUMPTIONS AND LIMITATIONS .....</b>               | <b>23</b> |
| <b>17</b> | <b>CONSULTATION PROCESS.....</b>                       | <b>23</b> |
| <b>18</b> | <b>FINDINGS .....</b>                                  | <b>24</b> |
| 18.1      | Minor improvements required. ....                      | 24        |
| 18.2      | Major improvements required.....                       | 24        |
| <b>19</b> | <b>AUDIT SUMMARY.....</b>                              | <b>26</b> |
| <b>20</b> | <b>RECOMMENDATIONS .....</b>                           | <b>27</b> |
| <b>21</b> | <b>CONCLUSION.....</b>                                 | <b>27</b> |
|           | <b>ANNEXURE A – CONCERNS/COMPLAINTS REGISTER .....</b> | <b>29</b> |
|           | <b>ANNEXURE B - NCR REGISTER .....</b>                 | <b>29</b> |
|           | <b>ANNEXURE C - INCIDENT REGISTER.....</b>             | <b>30</b> |
|           | <b>ANNEXURE D – PHOTOGRAPHS .....</b>                  | <b>38</b> |
|           | <b>THIS PAGE WAS INTENTIONALLY LEFT BLANK .....</b>    | <b>44</b> |

## TABLE OF FIGURES

|                                                                     |    |
|---------------------------------------------------------------------|----|
| Figure 1: Standing water at the waste area with maggots.....        | 39 |
| Figure 2: Large quantities of wood pats at the waste area .....     | 39 |
| Figure 3: Rainwater accumulated at Tower No. 13 .....               | 40 |
| Figure 4: Water ponding at the laydown area .....                   | 40 |
| Figure 5: Overflowing sump at the waste area. ....                  | 41 |
| Figure 6: bins overflowing with waste at the switching station..... | 41 |
| Figure 7: Alien vegetation that must be cleared.....                | 42 |
| Figure 8: Torn barricading nets must be taken for recycling.....    | 42 |

## ABBREVIATIONS

|             |                                                         |
|-------------|---------------------------------------------------------|
| <b>BAR</b>  | Basic Assessment Report                                 |
| <b>CA</b>   | Competent Authority                                     |
| <b>DEA</b>  | Department of Environmental Affairs (now DFFE)          |
| <b>DFFE</b> | Department of Forestry, Fisheries, and the Environment  |
| <b>DWS</b>  | Department of Water and Sanitation                      |
| <b>EA</b>   | Environmental Authorisation                             |
| <b>EAP</b>  | Environmental Assessment Practitioner                   |
| <b>ECO</b>  | Environmental Control Officer                           |
| <b>EIA</b>  | Environmental Impact Assessment                         |
| <b>EMPr</b> | Environmental Management Programme                      |
| <b>EO</b>   | Environmental Officer (Contractor)                      |
| <b>ER</b>   | Employer's Representative                               |
| <b>ESCO</b> | Environmental Site Compliance Officer                   |
| <b>kV</b>   | Kilovolt                                                |
| <b>MVA</b>  | Megavolt Amperes                                        |
| <b>MW</b>   | Megawatt                                                |
| <b>NCC</b>  | NCC Operations                                          |
| <b>NCR</b>  | Non-Compliance Report                                   |
| <b>NEMA</b> | National Environmental Management Act (No. 107 of 1998) |
| <b>NWA</b>  | National Water Act (No. 36 of 1998)                     |
| <b>OHPL</b> | Overhead Power Line                                     |
| <b>SDC</b>  | Safe Disposal Certificate                               |
| <b>SHE</b>  | Safety, Health, and Environment                         |
| <b>SS</b>   | Substation                                              |
| <b>TBC</b>  | To Be Confirmed                                         |

# 1 INTRODUCTION

## 1.1 Background

NCC Operations (Pty) Ltd ("**NCC**") was appointed by URSA Energy (Pty) LTD ("**URSA**") to provide a suitably experienced independent Environmental Control Officer ("**ECO**") for the construction phase of Virginia Solar Park which will be connected to the Eskom Theseus Main Transmission Substation ("**MTS**"). The site is located on Farm Blomskraal 216, Ventersburg RD located within the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province. On completion the facility will consist of the Photovoltaic ("**PV**") Power Plant with a maximum generation capacity up to 100 MW, a 132kV powerline connecting the substation to the Eskom Theseus substation which is located 16.2 km North-East of the north-western corner of project site.

The ECO has the responsibility of ensuring the mitigation/ rehabilitation measures and conditions referred to in the Environmental Authorisation ("**EA**") are implemented, as well as ensuring compliance with the requirements of the Environmental Management Programme ("**EMPr**"). This report provides an insight into the overall compliance performance and a summary of other environmental concerns and potential environmental risks through observations during site inspections.

This report is based on the following environmental conditions or requirements:

- a) Environmental Authorisations
  - 1) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
  - 2) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)
- b) Environmental Management Programmes
- c) Relevant environmental legislation.
- d) All other environmental permits, licenses, and authorisations.

The notification of commencement of construction was submitted to the DFFE for Virginia Solar Plant (Pty) Ltd on the 02 May 2024.

This report addresses conditions set out in the EA which states the ECO as part of their duties: *"The ECO must keep record of all activities on site, problems identified, transgressions noted, and a task schedule of tasks undertaken by the ECO."* As per the roles and responsibilities in the Virginia Solar Project ("**VSP**") EMPr, the



primary role of the ECO will be to monitor the construction activities and ensure that the mitigation measures of the EMPr and Environmental Authorisations (EA) are implemented. This report also includes an audit checklist for the VSP EA as follows:

- 1) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
- 2) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)

A summary of the various environmental requirements i.e. the audit criteria relating to the overall project is provided in **Table 1**.

**Table 1:** Summary of environmental requirements / criteria relating to the overall project.

| Components of overall project         | Environmental requirements / criteria |               |                                |              |
|---------------------------------------|---------------------------------------|---------------|--------------------------------|--------------|
|                                       | DFFE EA Ref No.                       | Issue date    | Approved EMPr<br>(Compiled by) | Date         |
| Virginia Solar Park Switching Station | 14/12/16/3/3/2/2099/2                 | 20 April 2022 | Terramanzi Group (Pty) Ltd     | October 2023 |
| Virginia Solar Park OHPL              | 14/12/16/3/3/1/2444                   | 02 Feb 2022   | Terramanzi Group (Pty) Ltd     | October 2023 |

This report represents the monitoring for the Construction Phase. The responsibility of enforcement of the conditions of the EAs and EMPrs lies with the Project and Project Manager, while the Department of Forestry, Fisheries, and the Environment (“DFFE”) Environmental Management Inspectorate (“EMI”) may also enforce existing and potentially new conditions through compliance notices.

An Environmental Site Compliance Officer (“ESCO”) has been appointed by the holder of the EA to monitor the project compliance onsite on a full-time basis on behalf of the EA holder. The responsibilities of the ESCO includes:

- Monitoring conditions of the Basic Assessment Reports (“BARs”), Environmental Impact Report (EIR) EAs and the EMPrs.
- Ensuring compliance with all relevant environmental legislation.
- Approving method statements (reviewed by the ECO and co-approved by Site Manager).
- Remaining employed until the completion of the construction activities.
- Reporting to the Project Manager, including all findings identified onsite.

- Reporting any significant findings to the ECO.
- Preparing and submitting monthly reports to the ECO and Project Manager.
- Monitoring compliance by the Contractor.

In addition, the ESCO will:

- Undertake daily inspections of the site and surrounding areas.
- Audit compliance with the EMPr and conditions of the environmental authorisation.
- Take appropriate action if the specifications contained in the EMPr and conditions of the environmental authorisation are not followed.
- Monitor and verify that environmental impacts are kept to a minimum, as far as possible; and
- Ensure that activities onsite comply with all relevant environmental legislation.

## **1.2 Audit Scope and Purpose.**

In accordance with Regulation 34 of the 2014 NEMA EIA Regulations (as amended) the holder of an environmental authorisation must, for the period during which the EA and EMPr, and where applicable the closure plan, remain valid —

- a) Ensure that the compliance with the conditions of the EA and the EMPr, and where applicable the closure plan, is audited; and*
- b) Submit an environmental audit report to the relevant competent authority.*

The purpose of this environmental audit is to verify compliance to the overarching environmental requirements specified as conditions of the EAs and EMPrs, and report on the extent to which the objectives of the EMPrs and are being achieved.

## **1.3 Monitoring Frequency and Reporting.**

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 27<sup>th</sup> of November 2025 after which this report was compiled which serves to document and audit. This report covers the monthly reporting for the month of November 2025.

## 2 AUDITOR BACKGROUND

NCC is a multi-disciplinary environmental consulting company based in South Africa which adopts a 'values driven' approach with a common purpose to conserve and create sustainable environments that enable people, planet and business to thrive. We are a trusted partner to major engineering and construction firms, mines, parastatals, film, sports and event production companies, municipalities, provincial and national government, and conservation organisations. Drawing on our years of experience on a wide range of projects, NCC works with our clients to develop, implement, and monitor customised services that add real value.

The auditor, **Jennipher Sakaunda**, is a senior environmental manager with more than 14 years' experience currently employed with NCC. Jennipher Sakaunda has experience in several environmental fields including environmental compliance monitoring and auditing, due diligence assessment, environmental impact and risk assessment, and compilation of environmental management plans/programmes.

**Table 2:** Details of the auditor.

|                       |                                                                                                                                                                                                |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Company</b>        | NCC Operations (Pty) Ltd                                                                                                                                                                       |
| <b>Auditor</b>        | Jennipher Sakaunda                                                                                                                                                                             |
| <b>Tel</b>            | +27 21 702 2884                                                                                                                                                                                |
| <b>Mobile</b>         | +27 69 510 7630                                                                                                                                                                                |
| <b>Email</b>          | <a href="mailto:jenniphers@ncc-group.co.za">jenniphers@ncc-group.co.za</a>                                                                                                                     |
| <b>Address</b>        | 26 Bell Close, Westlake Business Park Westlake, 7945                                                                                                                                           |
| <b>Affiliation</b>    | International Association of Impact Assessment South Africa.<br>Environmental Assessment Practitioner Association of South Africa.<br>South African Council of Natural Scientific Professions. |
| <b>Qualifications</b> | BSc (honors) Environmental Management                                                                                                                                                          |
| <b>Expertise</b>      | A detailed CV can be provided on request.                                                                                                                                                      |

### 3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (November 2025) included the following:

- Excavation of monopole foundations.
- Cast blinding slab and steel fixing at the OHL
- Erection of monopole towers at the OHL.
- Filling and compaction of borrow material.
- Construction of the internal road connecting the access road to the Temporary Site Offices (TSF) and Switching Station.
- Excavation and shuttering works for the IPP substation.

#### 3.1 General Outstanding matters

Any major outstanding matters are to be recorded and summarised in the Concerns Register (**Annexure A**). The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

#### 3.2 Audits (Internal and External)

Internal audits are undertaken monthly by the Red Rocket ESCO. This ECO Audit was undertaken on the 27<sup>th</sup> of November 2025. Audit tables/checklists are attached to this report. The ECO undertakes external monthly audits.

## 4 WASTE MANAGEMENT

The contractor must make provision for waste avoidance, minimisation, and separation of waste where possible through recycling efforts. Waste management awareness must be done on an ongoing basis and must be provided through toolbox talks and awareness posters. A waste station was constructed at V3 where waste is temporarily stored, sorted and recycled. The waste station includes a bund where waste will be stored and various compartments where waste will be sorted into. As a result of the waste area not being covered the sump has been filled with water resulting in polluted water overflowing onto the ground. Additionally, maggots have been noticed in the water in the waste area bund. Recyclables are being stored until there are enough quantities to transport to Mpact for recycling. Waste must be removed more frequently to prevent stocking large quantities onsite.

### 4.1 Domestic/ General Waste

A total of **3384 kg** of general waste was generated on site in the month of November 2025, **2125 kg** constituting boxes and wooden pallets were recycled. A total of **1259 kg** of waste were disposed at the Matjhabeng Local Municipality waste disposal site. Waste bins are placed along the OHL line where each team will be working, at the end of the day waste is collected and placed at the laydown areas for temporary storage. Designated waste areas have been provided at the contractors' main site offices/laydown areas for purposes of temporary storage of waste prior to collection and transferal to the licensed waste facilities. Bins at the laydown area are colour coded for each waste type. The contractor has commenced with taking waste for recycling.

The service providers dispose the general waste at Matjhabeng Local Municipality waste disposal site-Licence number: B33/2/340/21/P8 16/2/7/C404/D2/Z1/P367. Proof of disposal is available on request.

### 4.2 Hazardous waste

Hazardous waste skips are available at the dedicated waste storage area at each of the sub-contractors' site offices/lay down areas. The contractor disposed **5320 kg** of hazardous waste in November 2025. Hazardous waste in form of oil spillages, cement spillages and contaminated soil is kept onsite until there is enough to dispose. No major spillages have been recorded on site. The wastewater and concrete must be disposed of as hazardous.

### 4.3 Wastewater

Approximately **477 181 L** of sewerage waste was generated on site in the month of November 2025. Chemical toilets and a conservancy tank have been provided onsite. No major spillages incidents were recorded from the chemical toilets. The contractor must ensure these chemical toilets are serviced regularly and drip trays are placed under each toilet.

The General Authorisation that was issued by DWS for the includes the use of a conservancy tank up to a capacity of 50 000 L. The conservancy tank onsite has a capacity of 12 500 L which is below the stipulated GA threshold. The contractor must ensure that this capacity is not exceeded.

The Appointed Service Provider removes sewage and disposes of it at Matjhabeng Local Municipality wastewater treatment facility - Licence No: 10/D4/J/G/2082. Proof of disposal is available onsite. The contractor must ensure the appointed service provider is licenced to provide sewer removal services. With the work being spread out on the lines the contractor must ensure ablutions are within walking distance within the areas where people are working.

## 5 PROTECTIVE MEASURES

### 5.1 General

Protective measures have been deployed to mitigate environmental impacts or prevent impacts from occurring which includes:

- Security guards are present on the site, with access control in place.
- Induction training is conducted for all persons working and visiting the site.
- Snake gaiters are provided.
- Spill kits are available on site.
- No-go areas are demarcated and provided with signage.
- Access cards are used to enter and exit the site.
- Rapid alcohol detecting is in place.

## 6 ENVIRONMENTAL CONSERVATION

### 6.1 Conservation of Flora and Fauna

A permit to clear the site and relocate species of concern was received from the Free state Department of Economic, Small Business Development, Tourism and Environmental Affairs. The permit with Ref No. 202306000012649 was issued on 08/06/2023 to pluck protected and unprotected flora.

Clearance of alien vegetation has is in progress, however the pace at which the contractor is removing alien vegetation is concerning especially with the onset of rains. More resources must be allocated towards alien vegetation removal. It is important that the contractor clears all the alien vegetation as some of the alien plants will soon be dispersing seed creating a seed bank. The contractor must monitor the cleared areas to ensure alien vegetation does not re-establish. The contractor must make an effort to remove the stockpiled alien vegetation to the Matjhabeng Local Municipality for disposal.

### 6.2 Water Management

The contractor abstracted **1374 m<sup>3</sup>** of water from Sluice 16 and no of water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The GA allows for abstraction of 43 000m<sup>3</sup> annually, the contractor must ensure water abstraction does not exceed the licenced volumes. The wetland area around tower 13 has accumulated rainwater, the contractor must limit activities around the wetland area until a time when the wetland area has dried up.

### 6.3 Soil Management

Cleared topsoil has been stockpiled along the OHL line and the switching station. These must be protected from erosion and alien vegetation establishment. In some areas where the contractor has finished pouring concrete and the pits have closed. The contractor must ensure subsoil is used for infilling. Topsoil must only be spread after the structures have erected to prevent compaction.

### 6.4 Stormwater and Erosion onsite

The contractor's Stormwater Management Plan was approved, although measures to manage erosion as per the approved SWMP have been implemented signs of erosion and water ponding were observed. The SWMP must be revised to reflect the current conditions onsite. Measures to divert clean stormwater away from the works towards the watercourses must be implemented.

## **7 INFRASTRUCTURE MANAGEMENT**

### **7.1 Access Roads**

The project team is using existing farm roads for current construction activities until such time as the project access roads and internal roads have been constructed. Since water ponding and erosion was observed on the roads maintenance work must be done. Maintenance of the access roads must be done on a regular basis.

### **7.2 Fences, Gates, and Barricading**

The site is fenced with security personnel manning the gates. Access cards are used to allow entrance to site. Barricading was observed on site, and such should continue to be maintained around all open excavations along the OHPL servitudes to prevent potential fauna (wildlife and livestock) incidents. The contractor has put temporary fences which is more secure on some of the pits where work will continue at a later stage. Pits with ground water must be barricaded with temporary fences to prevent animals from falling into the pits. All excavation along the line must be barricaded and deep excavation signs and topsoil sign must be placed.

### **7.3 Buildings and Structures**

Containers have been established on site by various subcontractors that are being used as offices. Male and female ablution facilities have been provided. Chemical toilets and a conservancy tank are used to manage sewer onsite.

## **8 SOCIAL RESPONSIBILITY**

Any complaints from the public are to be recorded on complaints register maintained by the Contractor whose responsibility it is to track and resolve the complaints/issues that are raised. In addition, a box for receiving internal grievances is present at the main site office facility which allows for project staff to bring to the attention of the project management team any comments and or concerns.



## 9 ENVIRONMENTAL AWARENESS AND TRAINING

The contractor has undertaken Toolbox talks for the month of November 2025 covering the following topics:

- Topsoil Management
- Invasive alien plants on site
- Concrete and cement use
- Metal storage, use and waste handling
- Noise and vibration pollution control
- Dust control on site
- The Environment is your responsibility
- Hydration On Site
- Metal Use and waste
- Climate Change Awareness
- TB Policy Toolbox Talk
- Preservation of topsoil while backfilling
- Hydration On Site

## 10 HERITAGE

In the event of any unknown artefacts being uncovered during construction, the ESCO and Project Manager must be informed immediately who must then instruct work to be stopped in the immediate area and then promptly report the discovery/finding to the ECO, a heritage specialist and the relevant heritage authority to investigate and confirm if such discovery is in fact a heritage artefact of any significance. No activities impacting upon any heritage sites were reported during this reporting period.

## 11 WARNING & NCRS

No NCR reports were issued by the ECO in the month of November 2025.

## 12 REHABILITATION

No rehabilitation works have commenced during this period, further rehabilitation is expected to occur on the project as and when other works have been completed.

## 13 INCIDENTS AND ACCIDENTS

All environmental related events, incidents and accidents are to be reported directly to the ECO and kept on a central register and included in the monthly report. No environmental incidents that are reportable under Section 30 of the NEMA occurred in November 2025. A register of environmental incidents is attached as **Annexure C**.

## 14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 27<sup>th</sup> of November 2025 with observations documented in this report. Monthly ECO compliance reports are submitted to the Department (DFFE) by the ECO.

## 15 AUDIT METHODOLOGY

This section provides an overview of the methods employed in making observations and providing recommendations and conclusions derived from the audit procedures undertaken.

### 15.1 Audit Process

The site visit, data reviews and report drafting were undertaken by the ECO/auditor. The audit included the following procedures:

- **Site Inspections.** The areas and aspects covered during the inspections with concurrent discussions with the ESCO and site-based representatives of the EA holder included *inter alia*:
  - i. Access control to the sites.
  - ii. Ecologically sensitive areas, where applicable.
  - iii. Waste management.
  - iv. Incident and complaints management.
  - v. Landowner relations.
  - vi. Infrastructure management.
  - vii. Environmental Awareness.
  - viii. Record-keeping and document control.
  - ix. Stormwater and Erosion management
- **Documentation review.** This included:
  - i. A review of the EAs, EMPs and where applicable, method statements.
  - ii. A review of previous audit reports, records, observations, and findings.
  - iii. A review of any remedial and/or protective measures implemented.
  - iv. Identification, if applicable, any gaps requiring action and/or rectification.
- **Audit Report compilation.** This included:
  - i. Recording any observations and findings identified during the audit.
  - ii. Providing recommendations relating to improvement or non-compliance, if and where applicable.

## 15.2 Observation and Recommendation Determination

Observations and subsequent recommendations were based on and are limited to the following:

- i. Available documentation and records viewed or received prior, subsequent, or during the site visit.
- ii. Observations made during the period that the ECO/auditor was on site; and
- iii. Information received from both direct and cross-referenced discussions with permanent site-based staff.

## 15.3 Findings

Any key findings highlighted in this report will indicate areas and/or aspects that require improvement or rectification. The purpose of summarising the findings is to allow the EA holder to identify common management challenges that effect the level of compliance to the conditions of the EAs and EMPrs.

Where findings and recommendations pertaining are deemed significant through compliance status or performance, they are documented as specific issues in the report. All site-specific observations are recorded in the corresponding audit checklist tables.

## 15.4 Audit Tables and Compliance Ratings

The audit table captures observations and recommendations made in relation to the conditions stipulated in the EAs and EMPrs. It provides the reader with more detailed information in terms of what the stipulated requirements are in relation to the organisation's assessed current compliance status, according to the observations recorded by the auditor.

Ratings are calculated based on a scoring system whereby each auditable condition is provided with a score as highlighted in **Table 4** below.

**Table 4:** Compliance rating and scoring.

| Status                              | Compliance Rating |         | Description                                                                                                                                                                                |
|-------------------------------------|-------------------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | Abbreviation      | Scoring |                                                                                                                                                                                            |
| <i>Compliant</i>                    | C                 | 2       | <i>No improvements required</i>                                                                                                                                                            |
| <i>Partially Compliant</i>          | PC                | 1       | <i>Minor improvements required</i>                                                                                                                                                         |
| <i>Non-Compliant</i>                | NC                | 0       | <i>Major improvements required</i>                                                                                                                                                         |
| <i>Work in Progress</i>             | WiP               | -       | <i>Environmental management measures are underway but not yet fully implemented or verified, requiring further monitoring and assessment.</i>                                              |
| <i>Not Applicable / Not Audited</i> | NA                | -       | <i>No improvements required and / or the condition is either not, not yet or no longer relevant at the time of the audit</i>                                                               |
| <i>Informative</i>                  | info              | -       | <i>These relate to informative elements that provide either useful information or are descriptive in the explanation and understanding of statements or concepts in the audit criteria</i> |

Each condition has been ascribed a colour-coded status indicator of Compliant (green), Partially Compliant (orange), major-compliant (red), Not Auditable/Audited (grey), Work in Progress (light red) and Informative (blank/white) to assist the reader in determining aspects that require attention to improve on compliance achieved, if and where applicable. No compliance scoring is attributed any of the audit criteria information pertaining to the following three audit status symbols, namely 'NA', 'WiP', and 'info' as they were either not auditable and/or were not applicable/relevant at the time the audit was undertaken. In other words, they are excluded from the overall compliance rating calculations.

An overall compliance rating is calculated as a percentage to provide the reader with an overview of compliance to the relevant audit criteria however each condition should be considered on its own merits as the ratings do not necessarily portray the severity or impact of the reported finding relating to a condition.

## 16 ASSUMPTIONS AND LIMITATIONS

The ECO compliance audit and associated report are based upon the assumptions that:

- i. Documentation provided to the ECO/auditor is factual and true.
- ii. The audit is based purely on the conditions as stipulated in the EAs and EMPs.
- iii. The construction phase is currently underway and operational phase activities are not applicable.
- iv. Documentation / reports were randomly sampled / reviewed in order to accommodate time constraints.
- v. Where visual observations were not possible either due to physical access constraints or safety constraints, the ECO/auditor used other means to determine compliance, either through requesting written evidence provided by contractors / service providers who service the site or via interviews with technical site-based staff.

## 17 CONSULTATION PROCESS

The approach of consultation followed during the environmental audit was based on written (email) and telephonic correspondence between the ECO/auditor and the Environmental Site Compliance Officer which also includes consultation and communication with the EA holder and competent authority in terms of report submission.

## 18 FINDINGS

Findings are listed in the attached checklists, and it should be noted that findings should be considered individually in the context of the full audit and each condition and associated rating.

The following findings were noted onsite:

- Alien vegetation was observed on topsoil stockpiles.
- There is pile of torn nets laydown area at the laydown area that must be taken for recycling.
- Signs of erosion were observed throughout the construction area.
- Chemical containers are overcrowded in the chemical bund at the laydown area.
- Some excavations were observed to have no deep excavation and topsoil signage.
- The no-go areas on the wetland at tower 13 has not been barricading
- The access road in a bad condition due to erosion and water ponding
- Some machineries were standing with no drip trays increasing the chances of spills causing soil or water pollution.

Based on the outcomes of the audit it was established that the objectives of the EAs and EMPs were achieved in terms of:

- i. *Sufficiently providing for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis.*
- ii. *Ensuring compliance with the provisions of environmental authorisation and EMPs.*

### 18.1 Minor improvements required.

- Disposing of the torn nets. .

### 18.2 Major improvements required.

- Clearance of alien vegetation must be done on all affected areas.
- A barricading net must be placed to demarcate the no-go areas at the wetland area.
- Road maintenance must be done.

- Install draining systems and oil separators on the chemical bunds.
- Establish another chemical bund to store other chemicals.
- Implement stormwater measures on the entire site.
- Drip tray must be placed on every standing machine onsite.



## 19 AUDIT SUMMARY

In terms of the findings and results of the **November 2025** ECO audit, the project achieved an overall **99%** compliance rating with the conditions of the EAs and EMPs.

**Table 5: Compliance Scoring**

| No.                                       | Audit criteria                                                                                             | Compliant (C) | Partially Compliant (PC) | Major-non-Compliant (NC) | Work in Progress | Normative (info) | Not Applicable / Not Audited (NA) | Percentage Score      |
|-------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------|--------------------------|--------------------------|------------------|------------------|-----------------------------------|-----------------------|
| 1                                         | Environmental Authorisation for Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)                | 24            | 0                        | 0                        | 1                | 18               | 3                                 | 100%                  |
| 2                                         | Environmental Authorisation for Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2) | 25            | 1                        | 0                        | 1                | 19               | 3                                 | 98%                   |
| 3                                         | EMPr Virginia Solar Park OHPL (DFFE REF NO: 14/12/16/3/3/1/2444)                                           | 216           | 8                        | 0                        | 0                | 46               | 58                                | 98%                   |
| 4                                         | EMPr Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2)                            | 178           | 0                        | 0                        | 0                | 22               | 27                                | 100%                  |
| Overall total no. conditions              |                                                                                                            | 443           | 9                        | 0                        | 2                | 105              | 91                                |                       |
| Audited conditions                        |                                                                                                            | 886           | 9                        | 0                        | 0                | -                | -                                 | (Potential max score) |
| Overall Compliance Rating Calculation (%) |                                                                                                            | 99%           |                          |                          |                  |                  |                                   |                       |

## 20 RECOMMENDATIONS

**Based on the findings identified the following is recommended:**

- Barricade the no-go area (wetland) at tower number 13 with a barricade net to demarcate the boundaries of the sensitive sites. Only a no-go sign has been placed.
- Alien vegetation clearance must continue onsite, and the contractor must monitor the cleared areas to prevent reestablishment of alien vegetation.
- Roads must be maintained to correct the effects of erosion and water ponding.
- Stormwater measures must be implemented, measures to be implemented must align with the current conditions onsite.
- Drip trays must be used on all standing equipment including trucks waiting to be onboarded.
- Waste must be removed from the waste area more frequently to prevent overstocking the waste area.
- All torn nets must be removed for disposal.
- Another chemical bond must be provided to prevent overcrowding chemicals.

## 21 CONCLUSION

The contractor must ensure that systems and resources to monitor and manage environmental risks and impacts adequately are in place. Resources and personnel to train employees on the contents of the EMPs must be made to ensure that the project runs effectively and efficiently with minimal impact to the biophysical and socio-economic environment.

In general, the EMPs are effective in their current format in terms of content and relevance and there are no major shortcomings. The EMP's sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with this project.

**PREPARED BY:**

A handwritten signature in black ink, appearing to read 'Sakaunda'.

**Sakaunda Jennipher**

Environmental Control Officer

NCC Operations (Pty) Ltd

**M** -069 510 7630

**E** : [jenniphers@ncc-group.co.za](mailto:jenniphers@ncc-group.co.za)

**REVIEWED BY:**

A handwritten signature in black ink, appearing to read 'Nick Gates'.

**Nick Gates**

Senior Environmental Consultant

NCC Operations (Pty) Ltd

**M** -073 1998 431

**E** -[nickg@ncc-group.co.za](mailto:nickg@ncc-group.co.za)

## ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

### Open Concerns/Complaint

| No | Observation date | Concern/Complaint | Suggested Due Date <sup>1</sup> | Proposed Corrective Action | Status | Closure status |
|----|------------------|-------------------|---------------------------------|----------------------------|--------|----------------|
|    |                  |                   |                                 |                            |        |                |

*\*The concerns register is updated once the ECO is present on site.*

### Closed Concerns

| No | Observation date | Concern/Complaint | Due Date suggested by ECO | Corrective Action Taken | Outcome | Closure status |
|----|------------------|-------------------|---------------------------|-------------------------|---------|----------------|
|    |                  |                   |                           |                         |         |                |
|    |                  |                   |                           |                         |         |                |

## ANNEXURE B - NCR REGISTER

| Ref No. | Originator | Dated Issued | Description | Proposed Corrective Action | Closure Status | Closure Date | Further Action Required |
|---------|------------|--------------|-------------|----------------------------|----------------|--------------|-------------------------|
|         |            |              |             |                            |                |              |                         |

## ANNEXURE C - INCIDENT REGISTER

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                     | Volume                            | Remedial Action                                              |                                                                                 |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|--------------------------------------------------------------|---------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                  |                                   | Immediate<br>Corrective Actions                              | Preventative measures                                                           |
| 20/03/2025 | Waste water                                                                                     | Soil pollution                                                                               | On 20, 2025, at approximately 8:28, the conservative tank being used to collect wastewater from conservancy tank had overfilled, and a Spillage had occurred spillage of approximately 8-10 litres of wastewater mixed with the cleaning material. the toilet supplier attended to the spill immediate & initiated spill Clean-up. Contaminated soil was taken to the hazardous waste skip. | 10 l (below Section 30 threshold) | Clean- up must be done as soon as the spills are identified. | The conservancy tank must be emptied more frequently to reduce overfilling.     |
| 19/03/2025 | Waste water                                                                                     | Soil pollution                                                                               | Approximately 12 litres of wastewater mixed with the cleaning chemicals where toilets are located. The toilet had been leaking since the previous day and wastewater was contained in a drip tray. The toilet supplier was notified, and he came to service The toilets; however, during servicing; the drip tray spilled over causing the spillage of the wastewater onto the ground.      | 12l (below Section 30 threshold)  | Clean- up must be done as soon as the spills are identified. | Leaking toilets must not be allowed onsite.                                     |
| 08/03/2025 | Diesel spillage                                                                                 | Soil pollution                                                                               | On 08 March 2025 at 05:30, security supervisor discovered a diesel leakage during the morning patrol. The spillage occurred due to the diesel injectors that were loose one of them was not properly fitted and diesel pressure removed them while the bakkie was in motion.                                                                                                                | 20l (below Section 30 threshold)  | Clean- up must be done as soon as the spills are identified  | Vehicles must be maintained regular . only road worthy vehicles must be onsite. |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                 | Volume                                    | Remedial Action                                             |                                                                                |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                              |                                           | Immediate<br>Corrective Actions                             | Preventative measures                                                          |
| 07/03/2025 | Water and antifreeze                                                                            | Soil pollution                                                                               | The Driver parked the minibus on site, shortly a leak observed containing a mixture of water and antifreeze, while also exhibiting signs of overheating.                                                                                                                                                                                                                | -                                         | Clean- up must be done as soon as the spills are identified | Vehicles must be maintained regular. only road worthy vehicles must be onsite. |
| 06/05/2025 | Water mixed with antifreeze spillage                                                            | Soil pollution                                                                               | On 6 May 2025 at 14:00, the TLB Operator was busy moving spoil material near the access road to the allocated spoil Stockpile area, when the TLB, radiator fan belt snapped & the container that stores water & antifreeze busted. Approximately 5 Liters of water with antifreeze spilled                                                                              | 5 litres<br>(below Section 30 threshold ) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.                  |
| 08/05/2025 | Toilet Cleaner mixed with water spillage                                                        | Soil pollution                                                                               | A chemical toilet in PV3 at the laydown area at around 3:53 pm, 08 May 2025 was reported to be leaking, when the toilet was assessed, it was identified that there was a broken pipe that leaked the chemical water. An immediate action was taken to clean up the spillage. The contaminated soil was collected into the bags and taken to site waste management area. | 6 litres (below Section 30 threshold )    | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent.         |
| 12/05/2025 | Diesel spillage                                                                                 | Soil pollution                                                                               | On 12-05-2025 at 06:40, the ambulance was on the way to the access control point along the main access road, when it had a sudden breakdown and diesel was spilled along the access road, leaving a trail of diesel spill for approximately +-400 Metres. Approximately +-2 Litres of diesel was spilled                                                                | 2 litres (below Section 30 threshold )    | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.                  |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Volume                                          | Remedial Action                                              |                                                                                      |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                 | Immediate<br>Corrective Actions                              | Preventative measures                                                                |
| 15/05/2025 | Hydraulic oil spillage                                                                          | Soil pollution                                                                               | On the 15/05/2025, a side tipper truck was transporting spoil material when the cylinder failed and spilled ~7 litres of hydraulic oil, about 455m from the nearest watercourse. The contaminated soil was promptly cleaned up.                                                                                                                                                                                                                                                                                                                  | 7 litres ( <i>below Section 30 threshold</i> )  | Clean- up must be done as soon as the spills are identified  | All Vehicles must be serviced regularly to reduce breakdowns.                        |
| 20/05/2025 | Toilet Cleaner mixed with water spillage                                                        | soil pollution                                                                               | It was around 11:30 am when it was reported that there was a spillage, that when the Fidamo team was about to clean the toilets at Pv1 Laydown area, a pipe from the generator busted and the water leaked from the broken pipe. The water that spilled was approximately 3-4 Liters and the pipe was immediately stopped. The chemical that was in the water is blue splash Toilet chemical. An immediate action was taken to clean up the spillage. The contaminated soil was collected into the bags and taken to site waste management area. | 4 litres ( <i>below Section 30 threshold</i> )  | Clean- up must be done as soon as the spills are identified  | The maintenance/servicing of the toilets is to be made more stringent.               |
| 21/05/2025 | Fauna                                                                                           | Loss of biodiversity                                                                         | On the 21/05/2025 a snake was fatally wounded during the internal road construction works.                                                                                                                                                                                                                                                                                                                                                                                                                                                       | N/A                                             | The dead animal was buried.                                  | N/A                                                                                  |
| 26/05/2025 | Hydraulic oil spillage                                                                          | Soil pollution                                                                               | On 26/05/2025, at around 16:50 a drill rig operator noticed a leak from the machine, he immediately reported the leak to the supervisor. The supervisor called the mechanic but did not report the spillage. The oil further spilled to the soil during the repair attempts which were done under poor lighting. The                                                                                                                                                                                                                             | 25 litres ( <i>below Section 30 threshold</i> ) | Clean- up must be done as soon as the spills are identified. | The ESCO issued NCR to the subcontractor for failing to report spillage immediately. |



| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                             | Volume                                                                       | Remedial Action                                                                                            |                                                                                                               |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                              | Immediate Corrective Actions                                                                               | Preventative measures                                                                                         |
|            |                                                                                  |                                                                            | spillage was left overnight and was only reported to the EO the next morning when the shift began.                                                                                                                                                                                                                                                                                                                                                  |                                                                              |                                                                                                            |                                                                                                               |
| 11/06/2025 | Concrete and oil Spillage                                                        | Soil pollution                                                             | On the 11 <sup>th</sup> of June 2025 the concrete mixer truck overturned resulting in the spillage of an estimated 3m3 (3 cubic meters) of concrete and approximately 8litres of diesel. The contractor removed the spilled concrete and dumped it on the natural area adjacent to the road                                                                                                                                                         | 8 litres of diesel and 3m3 of concrete ( <i>below Section 30 threshold</i> ) | Clean- up must be done as soon as possible and an investigation must be done on the cause of the accident. | The ESCO issued an NCR to the subcontractor for failing to report dumping concrete on the natural vegetation. |
| 16/06/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | At 08:32am, on the 16th of June 2025, The Client (Robin) reported that ABLON's Ablution facilities were leaking which resulted to soil contamination, we immediately stopped everyone from using the Toilet and reported the issue to our service provider. A drip tray was placed immediately underneath the toilet. The event occurred at the OHL Site Camp and the name of the chemical that spilled on the ground is Portabloo Toilet Chemical. | 30 litres ( <i>below Section 30 threshold</i> )                              | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin.        | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced.              |
| 24/06/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | At around 8 am on the 24/06/2025 a spillage was reported by the contractor. Approximately 30 litres of Toilet Blue was spilled at the Virginia 1 laydown area. The spillage was cleaned up and the contaminated soil removed for disposal.                                                                                                                                                                                                          | 30 litres ( <i>below Section 30 threshold</i> )                              | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin.        | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced.              |



| Date       | Type                                                                                           |     | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Volume                                | Remedial Action                                                                                                                                    |                                                                    |
|------------|------------------------------------------------------------------------------------------------|-----|----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna &Flora/<br>Fire/ Water/<br>Administrative/<br>Other |     | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                       | Immediate<br>Corrective Actions                                                                                                                    | Preventative measures                                              |
| 08/07/2025 | Hydraulic<br>Spillage                                                                          | Oil | Soil pollution                                                                               | A tipper truck spilled some hydraulic oil when the driver was offloading some excavated material at PV2 I8 road on the 08h of July 2025. The driver lifted the truck to off load the material when it was halve way up, he discovered that the body of the truck was swinging to the sides and he tried to stop, and discovered some oil leaks from the hydraulic cylinder, about +- 9 litres of oil spilled to the ground and it was reported to the EO, immediately the supervisor and the driver cleaned the spillage and the contaminated soil was collected into bags and taken to ABC Solar Waste management area. | 30 litres (below Section 30 threshold | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin.                                                | Vehicles that are constantly breaking down must be moved off site. |
| 08/07/2025 | Hydraulic<br>Spillage                                                                          | Oil | Soil pollution,<br>Loss of<br>vegetation                                                     | A tipper truck spilled some hydraulic oil when the driver was offloading some excavated material at PV2 I8 road on the 08h of July 2025. The driver lifted the truck to off load the material when it was halve way up, he discovered that the body of the truck was swinging to the sides and he tried to stop, and discovered some oil leaks from the hydraulic cylinder, about +- 9 litres of oil spilled to the ground and it was reported to the EO, immediately the supervisor and the driver cleaned the spillage and the contaminated soil was collected into bags and taken to ABC Solar Waste management area. | +/- 9L                                | The spillages were cleaned, and the contaminated soil was removed and stored in bags and taken to waste management area at ABC solar laydown area. |                                                                    |

| Date       | Type                                                                                           | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                          | Volume   | Remedial Action                                                                                                                                |                                                                                                  |
|------------|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna &Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                       |          | Immediate<br>Corrective Actions                                                                                                                | Preventative measures                                                                            |
| 13/08/2025 | Sewage spillage                                                                                | Soil pollution,<br>Loss of<br>vegetation                                                     | A pipe from the pump got broken when the driver was reversing and it started to spill approximately 4 liters of sewage water, at PV2 block 15 at 2:18 pm and immediately after noticing the spills, he immediately stopped the car. He immediately cleaned and it was reported to the EO. Proper cleaning was further done by Fidamo's (toilet supplier) team members.                                                                           | +/- 4L   | The spillages were cleaned, and the contaminated soil was removed and stored in bags and taken to waste management centre in Virginia 3.       |                                                                                                  |
| 15/08/2025 | Toilet chemical spillage                                                                       | Soil pollution                                                                               | Toilet chemical spill at Tower 29. The Toilet Pump burst, and the chemical spilled into the ground contaminating the soil. The Environmental Officer immediately attended to the spill. A drip tray was placed immediately under the Toilet to contain the spillage. The volume of the chemical spill is approximately 4.5liters A spade is used to remove the contaminated soil. The contaminated soil was placed inside a hazardous waste bin. | +/- 4.5L | The spillages were cleaned, and the contaminated soil was removed and stored in bags and taken to waste management area at Ablon laydown area. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 26/08/2025 | Engine oil spillage                                                                            | Soil pollution                                                                               | A tractor towing a trailer filled with poles experienced an engine malfunction, resulting in the leakage of at least 7 litres of engine oil on the main access road near the MV trenches.                                                                                                                                                                                                                                                        | +/- 7L   | Absorbent material was used to absorb the engine oil from the compacted gravel road and later taken for disposal as hazardous waste.           | Vehicles that are constantly breaking down must be moved off site                                |

| Date       | Type                                                                                           | Impact                                                                                    | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Volume  | Remedial Action                                                                                            |                                                                                                  |
|------------|------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna &Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/ Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |         | Immediate<br>Corrective Actions                                                                            | Preventative measures                                                                            |
| 09/09/2025 | Toilet chemical spillage                                                                       | Soil pollution                                                                            | A chemical toilet in PV1 block 1 around 9:00 am, 09 September 2025 was reported to be leaking, when the toilet was assessed, it was overfull that resulted in overflowing. An immediate action was taken to clean up the spillage, however during the cleaning process the weather changed we experienced some lightning, and they had to stop. It was about 8-10 litres of chemical water that spilled. Then after lunch the weather was conducive to proceed with work, and they properly cleaned the spillage, and the contaminated soil was collected into | +/- 9L  | The spillage was cleaned, and the contaminated soil was removed and stored in bags, taken to ABC lay down. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 12/09/2025 | Toilet chemical spillage                                                                       | Soil pollution                                                                            | At 10:58 while on the way to use the toilet Wanga witnessed that the toilet is leaking & reported immediately to the HDEC EO.                                                                                                                                                                                                                                                                                                                                                                                                                                  | +/- 10L | Drip trays placed to contain the leakage. Absorbent was spread on the area where spill occurred.           | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 01/10/2025 | Toilet chemical spillage                                                                       | Soil pollution                                                                            | Approximately 8 litres of water and toilet blue mixture was spilled, a drip tray was placed under the toilet however not at the leaking points.                                                                                                                                                                                                                                                                                                                                                                                                                | +/- 8L  | The spillage was cleaned, and the contaminated soil was removed and stored in bags, taken to WMC.          | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |



| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                 | Volume | Remedial Action                                                         |                                                                                                  |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                              |        | Immediate<br>Corrective Actions                                         | Preventative measures                                                                            |
| 02/10/2025 | Toilet chemical<br>spillage                                                                     | Soil pollution                                                                               | A pipe from the pump inside the mobile toilet broke and started leaking, which caused a spillage that was discovered by EO. Approximately 10 liters of toilet blue chemical spilled. Upon discovery the service provider was notified and attended to the spillage.                                                                                                                                                     | +/-10L | The spillage was cleaned, and the contaminated soil was removed to WMC. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 03/10/2025 | Hydraulic oil<br>spillage                                                                       | Soil pollution                                                                               | A hydraulic oil pipe on a front-end loader burst, resulting in a spill of nearly 10 liters of hydraulic oil. The operator stopped the equipment, informed the supervisor and put a drip tray beneath the machine. A cleanup was conducted around the machinery while waiting for a mechanic to arrive. Once on site, the mechanic repaired the pipe and then moved the machine to clean the area underneath the loader. | +/-10L | The spillage was cleaned, and the contaminated soil was removed to WMC. | Vehicles that are constantly breaking down must be moved off site                                |

## **ANNEXURE D – PHOTOGRAPHS**



**Figure 1:** Standing water at the waste area with maggots.



**Figure 2:** Large quantities of wood pats at the waste area





**Figure 3:** Rainwater accumulated at Tower No. 13



**Figure 4:** Water ponding at the laydown area



**Figure 5:** Overflowing sump at the waste area.



**Figure 6:** Bins overflowing with waste at the switching station





**Figure 7:** Alien vegetation that must be cleared.



**Figure 8:** Torn barricading nets must be taken for recycling.



**Figure 9:** Concrete slab for concrete mixing



**Figure 10:** Crowded chemical bund

**THIS PAGE WAS INTENTIONALLY LEFT BLANK**





---

# ECO MONTHLY ENVIRONMENTAL MONITORING REPORT

Virginia Photo Voltaic (PV) Solar Facility 1, 2 and 3,  
Matjhabeng, Lejweleputswa District Municipality within  
the jurisdiction of the Free State Province.

---

**PREPARED FOR:**

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

Department of Forestry, Fisheries, and the Environment: Compliance Monitoring

**DATED:**

November 2025

**PREPARED BY:**

NCC Operations

**T** • 021 702 2884

**E** • [info@ncc-group.co.za](mailto:info@ncc-group.co.za)

## DECLARATION OF INDEPENDENCE

I, Jennipher Sakaunda, as duly authorised representative of NCC Operations (Pty) Ltd ("**NCC**"), hereby confirm my independence (as well as that of NCC) as an auditor and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which URSA Energy (Pty) Ltd has appointed NCC as Environmental Control Officer ("**ECO**"), other than fair remuneration for work performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'J Sakaunda', is positioned below the 'Signed:' text.

**Jennipher Sakaunda**

03 December 2025

Environmental Control Officer

NCC Operations (Pty) Ltd

## **LIABILITY DISCLAIMER AND CONFIDENTIALITY CLAUSE**

All inspections conducted, as well as reports and recommendations provided by NCC are purely advisory. They are primarily intended for the purpose of assisting clients in loss control, risk management as well as health, safety, and environmental procedures.

Observations and recommendations are the result of practices and conditions observed, and information made available to us in various forms at the time of our visit. They do not purport to refer to or guarantee compliance with local or government regulations which may be applicable to such practices and conditions. This report should not be considered a definitive listing of all existing risks nor an absolute solution to all indicated risks, or hazards present from time to time in the Client Organisation. The report should always be considered in its entirety; individual sentences, paragraphs or sections of the report should not be used in isolation.

This report should not be reproduced except in its entirety, including this liability disclaimer or contents reproduced or disclosed to any third party without the prior written approval of NCC.

NCC assumes no responsibility for any losses incurred as a result of the implementation, management, and operation of recommended health, safety and environmental systems, processes and procedures.

## DOCUMENT CONTROL

|                     |                                             |
|---------------------|---------------------------------------------|
| <b>REPORT TITLE</b> | Monthly ECO Environmental Monitoring Report |
| <b>PROJECT</b>      | Virginia Solar PV 1, 2, 3                   |
| <b>LOCATION</b>     | Free State Province                         |
| <b>EA HOLDER</b>    | URSA Energy (Pty) Ltd                       |
| <b>ECO</b>          | NCC Operations (Pty) Ltd                    |
| <b>REVISION</b>     | 00                                          |
| <b>DATE</b>         | 03/12/2025                                  |

| Revision | Date       | Description                  |
|----------|------------|------------------------------|
| Rev 00   | 03/12/2025 | First Draft - Internal       |
| Rev 01   | TBC        | Final - Authority submission |

## REPORT DISTRIBUTION LIST

| Name                   | Organisation                      | Issued     | Format     |
|------------------------|-----------------------------------|------------|------------|
| Janine Brasington      | Red Rocket South Africa (Pty) Ltd | 03/12/2025 | Electronic |
| Tarryn Frankland       | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Maggie Logan           | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Director of Compliance | DFFE                              | TBC        | Electronic |

## TABLE OF CONTENTS

|                                                     |           |
|-----------------------------------------------------|-----------|
| <b>TABLE OF FIGURES .....</b>                       | <b>7</b>  |
| <b>ABBREVIATIONS .....</b>                          | <b>8</b>  |
| <b>1 INTRODUCTION .....</b>                         | <b>9</b>  |
| 1.1 Background.....                                 | 9         |
| 1.2 Audit Scope and Purpose.....                    | 11        |
| 1.3 Monitoring Frequency and Reporting.....         | 11        |
| <b>2 AUDITOR BACKGROUND .....</b>                   | <b>12</b> |
| <b>3 GENERAL (NOTABLE EVENTS) .....</b>             | <b>13</b> |
| 3.1 General Outstanding matters.....                | 13        |
| 3.2 Audits (Internal and External).....             | 13        |
| <b>4 WASTE MANAGEMENT .....</b>                     | <b>14</b> |
| 4.1 Domestic/ General Waste.....                    | 14        |
| 4.2 Hazardous waste.....                            | 14        |
| 4.3 Wastewater .....                                | 15        |
| <b>5 PROTECTIVE MEASURES .....</b>                  | <b>16</b> |
| 5.1 General .....                                   | 16        |
| <b>6 ENVIRONMENTAL CONSERVATION .....</b>           | <b>17</b> |
| 6.1 Conservation of Flora and Fauna .....           | 17        |
| 6.2 Water Management.....                           | 17        |
| 6.3 Soil Management .....                           | 17        |
| 6.4 Stormwater and Erosion onsite .....             | 17        |
| <b>7 INFRASTRUCTURE MANAGEMENT .....</b>            | <b>18</b> |
| 7.1 Access Roads.....                               | 18        |
| 7.2 Fences, Gates, and Barricading .....            | 18        |
| 7.3 Buildings and Structures .....                  | 18        |
| <b>8 SOCIAL RESPONSIBILITY .....</b>                | <b>18</b> |
| <b>9 ENVIRONMENTAL AWARENESS AND TRAINING .....</b> | <b>19</b> |
| <b>10 HERITAGE .....</b>                            | <b>19</b> |
| <b>11 WARNING &amp; NCRS .....</b>                  | <b>19</b> |



|           |                                                        |           |
|-----------|--------------------------------------------------------|-----------|
| <b>12</b> | <b>REHABILITATION .....</b>                            | <b>20</b> |
| <b>13</b> | <b>INCIDENTS AND ACCIDENTS .....</b>                   | <b>20</b> |
| <b>14</b> | <b>MEETINGS AND OTHER CORRESPONDANCE.....</b>          | <b>20</b> |
| <b>15</b> | <b>AUDIT METHODOLOGY.....</b>                          | <b>21</b> |
| 15.1      | Audit Process.....                                     | 21        |
| 15.2      | Observation and Recommendation Determination.....      | 22        |
| 15.3      | Findings.....                                          | 22        |
| 15.4      | Audit Tables and Compliance Ratings .....              | 22        |
| <b>16</b> | <b>ASSUMPTIONS AND LIMITATIONS .....</b>               | <b>24</b> |
| <b>17</b> | <b>CONSULTATION PROCESS.....</b>                       | <b>24</b> |
| <b>18</b> | <b>FINDINGS .....</b>                                  | <b>25</b> |
| 18.1      | Minor improvements required. ....                      | 25        |
| 18.2      | Major improvements required.....                       | 25        |
| <b>19</b> | <b>AUDIT SUMMARY.....</b>                              | <b>27</b> |
| <b>20</b> | <b>RECOMMENDATIONS .....</b>                           | <b>28</b> |
| <b>21</b> | <b>CONCLUSION .....</b>                                | <b>28</b> |
|           | <b>ANNEXURE A – CONCERNS/COMPLAINTS REGISTER .....</b> | <b>30</b> |
|           | <b>ANNEXURE B - NCR REGISTER .....</b>                 | <b>30</b> |
|           | <b>ANNEXURE C - INCIDENT REGISTER .....</b>            | <b>31</b> |
|           | <b>ANNEXURE D – PHOTOGRAPHS .....</b>                  | <b>41</b> |

## TABLE OF FIGURES

|                                                            |    |
|------------------------------------------------------------|----|
| Figure 1: Condition of the access road.....                | 42 |
| Figure 2: Alien Vegetation.....                            | 42 |
| Figure 3: Waste management must be improved .....          | 43 |
| Figure 4: Overflowing sump at the waste area .....         | 43 |
| Figure 5: Maggots in standing water at the waste area..... | 44 |
| Figure 6: Cigarette buds on the ground.....                | 44 |
| Figure 7: Damage caused rainwater .....                    | 45 |
| Figure 8: Machinery standing without drip trays.....       | 45 |
| Figure 9: Open trenches left open unbarricaded.....        | 46 |
| Figure 10: Paint container left open in the rain.....      | 46 |
| Figure 11: Newly constructed diesel bund.....              | 47 |

## ABBREVIATIONS

|             |                                                         |
|-------------|---------------------------------------------------------|
| <b>BAR</b>  | Basic Assessment Report                                 |
| <b>CA</b>   | Competent Authority                                     |
| <b>DEA</b>  | Department of Environmental Affairs (now DFFE)          |
| <b>DFFE</b> | Department of Forestry, Fisheries, and the Environment  |
| <b>DWS</b>  | Department of Water and Sanitation                      |
| <b>EA</b>   | Environmental Authorisation                             |
| <b>EAP</b>  | Environmental Assessment Practitioner                   |
| <b>ECO</b>  | Environmental Control Officer                           |
| <b>EIA</b>  | Environmental Impact Assessment                         |
| <b>EMPr</b> | Environmental Management Programme                      |
| <b>EO</b>   | Environmental Officer (Contractor)                      |
| <b>ER</b>   | Employer's Representative                               |
| <b>ESCO</b> | Environmental Site Compliance Officer                   |
| <b>kV</b>   | Kilovolt                                                |
| <b>MVA</b>  | Megavolt Amperes                                        |
| <b>MW</b>   | Megawatt                                                |
| <b>NCC</b>  | NCC Operations                                          |
| <b>NCR</b>  | Non-Compliance Report                                   |
| <b>NEMA</b> | National Environmental Management Act (No. 107 of 1998) |
| <b>NWA</b>  | National Water Act (No. 36 of 1998)                     |
| <b>OHPL</b> | Overhead Power Line                                     |
| <b>SDC</b>  | Safe Disposal Certificate                               |
| <b>SHE</b>  | Safety, Health, and Environment                         |
| <b>SS</b>   | Substation                                              |
| <b>TBC</b>  | To Be Confirmed                                         |

# 1 INTRODUCTION

## 1.1 Background

NCC Operations (Pty) Ltd ("**NCC**") was appointed by URSA Energy (Pty) LTD ("**URSA**") to provide a suitably experienced independent Environmental Control Officer ("**ECO**") for the construction phase of Virginia Solar Park which will be connected to the Eskom Theseus Main Transmission Substation ("**MTS**"). The site is located on Farm Blomskraal 216, Ventersburg RD located within the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province. On completion the facility will consist of the Photovoltaic (PV) Power Plant with a maximum generation capacity up to 100 MW, a 132kV powerline connecting the substation to the Eskom Theseus substation which is located 16.2 km North-East of the north-western corner of project site.

The ECO has the responsibility of ensuring the mitigation/ rehabilitation measures and conditions referred to in the Environmental Authorisation ("**EA**") are implemented, as well as ensuring compliance with the requirements of the Environmental Management Programme ("**EMPr**"). This report provides an insight into the overall compliance performance and a summary of other environmental concerns and potential environmental risks through observations during site inspections.

This report is based on the following environmental conditions or requirements:

- a) Environmental Authorisations
  - 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
  - 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
  - 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)
- b) Environmental Management Programmes
- c) Relevant environmental legislation.
- d) All other environmental permits, licenses, and authorisations.

The notification of commencement of construction was submitted to the DFFE for Virginia Solar Plant (Pty) Ltd on the 02 May 2024.

This report addresses conditions set out in the EA which states the ECO as part of their duties: "*The ECO must keep record of all activities on site, problems identified, transgressions noted, and a task schedule of tasks undertaken by the ECO.*" As per the roles and responsibilities in the Virginia Solar Project ("**VSP**") EMPr, the primary role of the ECO will be to monitor the construction activities and ensure that the mitigation measures

of the EMPr and Environmental Authorisations (EA) are implemented. This report also includes an audit checklist for the VSP EA as follows:

- 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
- 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
- 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)

A summary of the various environmental requirements i.e. the audit criteria relating to the overall project is provided in **Table 1**.

**Table 1:** Summary of environmental requirements / criteria relating to the overall project.

| Components of overall project | Environmental requirements / criteria |               |                                |              |
|-------------------------------|---------------------------------------|---------------|--------------------------------|--------------|
|                               | DFFE EA Ref No.                       | Issue date    | Approved EMPr<br>(Compiled by) | Date         |
| Virginia 1 Solar Park         | 14/12/16/3/3/2/2099/1                 | 20 April 2022 | Terramanzi Group (Pty) Ltd     | October 2023 |
| Virginia 2 Solar Park         | 14/12/16/3/3/2/2100                   | 20 May 2022   | Terramanzi Group (Pty) Ltd     | October 2023 |
| Virginia 3 Solar Park         | 14/12/16/3/3/2/2101                   | 20 April 2022 | Terramanzi Group (Pty) Ltd     | October 2023 |

This report represents the monitoring for the Construction Phase. The responsibility of enforcement of the conditions of the EAs and EMPrs lies with the Project and Project Manager, while the Department of Forestry, Fisheries, and the Environment (“DFFE”) Environmental Management Inspectorate (“EMI”) may also enforce existing and potentially new conditions through compliance notices.

An Environmental Site Compliance Officer (“ESCO”) has been appointed by the holder of the EA to monitor the project compliance onsite on a full-time basis on behalf of the EA holder. The responsibilities of the ESCO includes:

- Monitoring conditions of the Basic Assessment Reports (“BARs”), Environmental Impact Report (EIR) EAs and the EMPrs.
- Ensuring compliance with all relevant environmental legislation.

- Approving method statements (reviewed by the ECO and co-approved by Site Manager).
- Remaining employed until the completion of the construction activities.
- Reporting to the Project Manager, including all findings identified onsite.
- Reporting any significant findings to the ECO.
- Preparing and submitting monthly reports to the ECO and Project Manager.
- Monitoring compliance by the Contractor.

In addition, the ESCO will:

- Undertake daily inspections of the site and surrounding areas.
- Audit compliance with the EMPr and conditions of the environmental authorisation.
- Take appropriate action if the specifications contained in the EMPr and conditions of the environmental authorisation are not followed.
- Monitor and verify that environmental impacts are kept to a minimum, as far as possible; and
- Ensure that activities onsite comply with all relevant environmental legislation.

## 1.2 Audit Scope and Purpose.

In accordance with Regulation 34 of the 2014 NEMA EIA Regulations (as amended) the holder of an environmental authorisation must, for the period during which the EA and EMPr, and where applicable the closure plan, remain valid —

- Ensure that the compliance with the conditions of the EA and the EMPr, and where applicable the closure plan, is audited; and*
- Submit an environmental audit report to the relevant competent authority.*

The purpose of this environmental audit is to verify compliance to the overarching environmental requirements specified as conditions of the EAs and EMPrs, and report on the extent to which the objectives of the EMPrs and are being achieved.

## 1.3 Monitoring Frequency and Reporting.

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 27<sup>th</sup> of November 2025 after which this report was compiled which serves to document and audit. This report covers the monthly reporting for the month of November 2025.

## 2 AUDITOR BACKGROUND

NCC is a multi-disciplinary environmental consulting company based in South Africa which adopts a 'values driven' approach with a common purpose to conserve and create sustainable environments that enable people, planet and business to thrive. We are a trusted partner to major engineering and construction firms, mines, parastatals, film, sports and event production companies, municipalities, provincial and national government, and conservation organisations. Drawing on our years of experience on a wide range of projects, NCC works with our clients to develop, implement, and monitor customised services that add real value.

The auditor, **Jennipher Sakaunda**, is a senior environmental manager with more than 14 years' experience currently employed with NCC. Jennipher Sakaunda has experience in several environmental fields including environmental compliance monitoring and auditing, due diligence assessment, environmental impact and risk assessment, and compilation of environmental management plans/programmes.

**Table 2:** Details of the auditor.

|                       |                                                                                                                                                                                                |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Company</b>        | NCC Operations (Pty) Ltd                                                                                                                                                                       |
| <b>Auditor</b>        | Jennipher Sakaunda                                                                                                                                                                             |
| <b>Tel</b>            | +27 21 702 2884                                                                                                                                                                                |
| <b>Mobile</b>         | +27 69 510 7630                                                                                                                                                                                |
| <b>Email</b>          | <a href="mailto:jenniphers@ncc-group.co.za">jenniphers@ncc-group.co.za</a>                                                                                                                     |
| <b>Address</b>        | 26 Bell Close, Westlake Business Park Westlake, 7945                                                                                                                                           |
| <b>Affiliation</b>    | International Association of Impact Assessment South Africa.<br>Environmental Assessment Practitioner Association of South Africa.<br>South African Council of Natural Scientific Professions. |
| <b>Qualifications</b> | BSc (honors) Environmental Management                                                                                                                                                          |
| <b>Expertise</b>      | A detailed CV can be provided on request.                                                                                                                                                      |

### 3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (November 2025) included the following:

- Construction of the internal road connecting the access road to the Temporary Site Offices (“TSF”) and Switching Station.
- Demobilisation of site offices and laydown area.
- Fencing.
- Clearing and grubbing of PV area and levelling works.
- Drilling and pile installations.
- Reworking of the rain damaged portions of the access road.
- Installation of Solar Panels
- Installation of torque tubes.
- Trench excavation works for cables.
- Establishing permanent berms.

#### 3.1 General Outstanding matters

Any major outstanding matters are to be recorded and summarised in the Concerns Register (**Annexure A**). The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

#### 3.2 Audits (Internal and External)

Internal audits are undertaken monthly by the Red Rocket ESCO. This ECO Audit was undertaken on the 27<sup>th</sup> of November 2025. Audit tables/checklists are attached to this report. The ECO undertakes external monthly audits.



## 4 WASTE MANAGEMENT

The contractor must make provision for waste avoidance, minimisation, and separation of waste where possible through recycling efforts. Waste management awareness must be done on an ongoing basis and must be provided through toolbox talks and awareness posters. A waste station was constructed at V3 where waste is temporarily stored, sorted and recycled. The waste station includes a bund where waste will be stored and various compartments where waste will be sorted into. The contractor must ensure that the waste area has a roof as rainwater has filled the sump resulting in dirty water overflowing onto the ground. Additionally, maggots have been noticed in the water in the waste area bund. Recyclables are transported to Mpact for recycling. Large quantities of wood pallets and plastic straps were observed onsite. Waste must be removed from site more frequently to ensure adequate storage space.

### 4.1 Domestic/ General Waste

A total of **3384 kg** of general waste was generated on site in the month of November 2025, **2125 kg** constituting boxes and wooden pallets were recycled. A total of **1259 kg** of waste were disposed at the Matjhabeng Local Municipality waste disposal site. Waste bins are placed along the OHL line where each team will be working, at the end of the day waste is collected and placed at the laydown areas for temporary storage. Designated waste areas have been provided at the contractors' main site offices/laydown areas for purposes of temporary storage of waste prior to collection and transferal to the licensed waste facilities. Bins at the laydown area are colour coded for each waste type. The contractor has commenced with taking waste for recycling.

The service providers dispose the general waste at Matjhabeng Local Municipality waste disposal site-Licence number: B33/2/340/21/P8 16/2/7/C404/D2/Z1/P367. Proof of disposal is available on request.

### 4.2 Hazardous waste

Hazardous waste skips are available at the dedicated waste storage area at each of the sub-contractors' site offices/lay down areas. The contractor disposed **5320 kg** of hazardous waste in November 2025. Hazardous waste in form of oil spillages, cement spillages and contaminated soil is kept onsite until there is enough to dispose. . No major spillages have been recorded on site. All standing equipment and trucks must be equipped with drip trays to prevent spillages.

### 4.3 Wastewater

Approximately **477 181 L** of sewerage waste was generated on site in the month of November 2025. Chemical toilets and a conservancy tank have been provided onsite. Fewer incidents of spillages from the chemical toilets have been recorded this month an improvement from the previous months. The contractor must ensure these chemical toilets are serviced regularly and drip trays are placed under each toilet.

The General Authorisation that was issued by DWS for the includes the use of a conservancy tank up to a capacity of 50 000 L. The conservancy tank onsite has a capacity of 12 500 L which is below the stipulated GA threshold. The contractor must ensure that this capacity is not exceeded.

The Appointed Service Provider removes sewage and disposes of it at Matjhabeng Local Municipality wastewater treatment facility - Licence No: 10/D4/J/G/2082. Proof of disposal is available onsite. The contractor must ensure the appointed service provider is licenced to provide sewer removal services. With the work being spread out the contractor must ensure ablutions are within walking distance within the areas where people are working.

## 5 PROTECTIVE MEASURES

### 5.1 General

Protective measures have been deployed to mitigate environmental impacts or prevent impacts from occurring which includes:

- Security guards are present on the site, with access control in place.
- Induction training is conducted for all persons working and visiting the site.
- Snake gaiters are provided.
- Spill kits are available on site.
- No-go areas are demarcated and provided with signage.
- Access cards are used to enter and exit the site.
- Rapid alcohol detecting is in place.

## 6 ENVIRONMENTAL CONSERVATION

### 6.1 Conservation of Flora and Fauna

A permit to clear the site and relocate species of concern was received from the Free state Department of Economic, Small Business Development, Tourism and Environmental Affairs. The permit with Ref No. 202306000012649 was issued on 08/06/2023 to pluck protected and unprotected flora.

Clearance of alien vegetation is in progress, however the pace at which the contractor is removing alien vegetation is concerning especially with the onset of rains. Additionally, cleared vegetation is not being removed to landsite, this may result in the alien seed spreading even into the no go areas. The contractor must monitor the newly cleared areas and areas where alien vegetation was removed to ensure alien vegetation does not re-establish.

### 6.2 Water Management

The contractor has abstracted **2548 m<sup>3</sup>** of water from Sluice 16. No water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The GA allows for abstraction of 43 000m<sup>3</sup> annually, the contractor must ensure water abstraction does not exceed the licenced volumes.

### 6.3 Soil Management

Cleared topsoil must be protected from erosion and alien vegetation establishment. Alien vegetation has established on the stockpiles and must be cleared. Significant soil erosion was noted on the PV areas and the access. The measures outlined in the Stormwater Management plan must be implemented to prevent further erosion and damage to the infrastructure onsite. Eroded areas must be filled up to correct the effects of erosion. Berms that have been developed must be protected from erosion by planting indigenous vegetation.

### 6.4 Stormwater and Erosion onsite

Although contractor's Stormwater Management Plan ("**SWMP**") was approved and some measures implemented, erosion and water ponding were observed on the road, laydown areas and the solar fields. The road near PV2 area was washed away by stormwater and must be fixed. The SWMP must be assessed to check if it is aligned with the changes onsite.

## **7 INFRASTRUCTURE MANAGEMENT**

### **7.1 Access Roads**

The project team is using existing farm roads for current construction activities until such time as the project access roads and internal roads have been constructed. Since erosion and water ponding were observed contractor must maintain access roads. Maintenance of the access roads must be done on a regular basis.

### **7.2 Fences, Gates, and Barricading**

The site is fenced with security personnel manning the access gates. Access cards are used to allow entrance to site. Barricading was observed on site, and such should continue to be maintained around all open excavations to prevent potential fauna (wildlife and livestock) incidents. The contractor must ensure trenches for cables on are barricaded at the end of each working day. The contractor is advised to work on small sections at a time to ensure that there is enough material to barricade the open trenches.

### **7.3 Buildings and Structures**

Containers have been established on site by various subcontractors that are being used as offices. Male and female ablution facilities have been provided. Chemical toilets and a conservancy tank are used to manage sewer onsite. The contractor must ensure the bund meets the requirements such as ventilation and capacity as outlined in the EMPr. A waste station has been established at V3. The waste station constitutes a bunded areas for the storage of hazardous waste and varies compartments where waste will be segregated into. A sump was constructed to capture wastewater.

## **8 SOCIAL RESPONSIBILITY**

Any complaints from the public are to be recorded on complaints register maintained by the Contractor whose responsibility it is to track and resolve the complaints/issues that are raised. In addition, a box for receiving internal grievances is present at the main site office facility which allows for project staff to bring to the attention of the project management team any comments and or concerns.

## 9 ENVIRONMENTAL AWARENESS AND TRAINING

The contractor has undertaken Toolbox talks for the month of November 2025 covering the following topics:

- Topsoil Management
- Invasive alien plants on site
- Concrete and cement use
- Metal storage, use and waste handling
- Noise and vibration pollution control
- Dust control on site
- The Environment is your responsibility
- Hydration On Site
- Metal Use and waste
- Climate Change Awareness
- TB Policy Toolbox Talk
- Preservation of topsoil while backfilling
- Hydration On Site

## 10 HERITAGE

In the event of any unknown artefacts being uncovered during construction, the ESCO and Project Manager must be informed immediately who must then instruct work to be stopped in the immediate area and then promptly report the discovery/finding to the ECO, a heritage specialist and the relevant heritage authority to investigate and confirm if such discovery is in fact a heritage artefact of any significance. No activities impacting upon any heritage sites were reported during this reporting period.

A barricade net was placed around the graves near the main gate to ensure the site is not disturbed by trucks moving excess topsoil.

## 11 WARNING & NCRS

No NCR reports were issued by the ECO in the month of November 2025.

## 12 REHABILITATION

No rehabilitation works have commenced during this period, further rehabilitation is expected to occur on the project as and when other works have been completed.

## 13 INCIDENTS AND ACCIDENTS

All environmental related events, incidents and accidents are to be reported directly to the ECO and kept on a central register and included in the monthly report. No environmental incidents that are reportable under Section 30 of the NEMA occurred in November 2025. A register of environmental incidents is attached as **Annexure C**.

## 14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 27<sup>th</sup> of November 2025 with observations documented in this report. Monthly ECO compliance reports are submitted to the Department (**DFFE**) by the ECO.

## 15 AUDIT METHODOLOGY

This section provides an overview of the methods employed in making observations and providing recommendations and conclusions derived from the audit procedures undertaken.

### 15.1 Audit Process

The site visit, data reviews and report drafting were undertaken by the ECO/auditor. The audit included the following procedures:

- **Site Inspections.** The areas and aspects covered during the inspections with concurrent discussions with the ESCO and site-based representatives of the EA holder included *inter alia*:
  - i. Access control to the sites.
  - ii. Ecologically sensitive areas, where applicable.
  - iii. Waste management.
  - iv. Incident and complaints management.
  - v. Landowner relations.
  - vi. Infrastructure management.
  - vii. Environmental Awareness.
  - viii. Record-keeping and document control.
  - ix. Stormwater and Erosion management
- **Documentation review.** This included:
  - i. A review of the EAs, EMPs and where applicable, method statements.
  - ii. A review of previous audit reports, records, observations, and findings.
  - iii. A review of any remedial and/or protective measures implemented.
  - iv. Identification, if applicable, any gaps requiring action and/or rectification.
- **Audit Report compilation.** This included:
  - i. Recording any observations and findings identified during the audit.
  - ii. Providing recommendations relating to improvement or non-compliance, if and where applicable.



## 15.2 Observation and Recommendation Determination

Observations and subsequent recommendations were based on and are limited to the following:

- i. Available documentation and records viewed or received prior, subsequent, or during the site visit.
- ii. Observations made during the period that the ECO/auditor was on site; and
- iii. Information received from both direct and cross-referenced discussions with permanent site-based staff.

## 15.3 Findings

Any key findings highlighted in this report will indicate areas and/or aspects that require improvement or rectification. The purpose of summarising the findings is to allow the EA holder to identify common management challenges that effect the level of compliance to the conditions of the EAs and EMPrs.

Where findings and recommendations pertaining are deemed significant through compliance status or performance, they are documented as specific issues in the report. All site-specific observations are recorded in the corresponding audit checklist tables.

## 15.4 Audit Tables and Compliance Ratings

The audit table captures observations and recommendations made in relation to the conditions stipulated in the EAs and EMPrs. It provides the reader with more detailed information in terms of what the stipulated requirements are in relation to the organisation's assessed current compliance status, according to the observations recorded by the auditor.

Ratings are calculated based on a scoring system whereby each auditable condition is provided with a score as highlighted in **Table 3** below.

**Table 4:** Compliance rating and scoring.

| Status                              | Compliance Rating |         | Description                                                                                                                                                                                |
|-------------------------------------|-------------------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | Abbreviation      | Scoring |                                                                                                                                                                                            |
| <i>Compliant</i>                    | C                 | 2       | <i>No improvements required</i>                                                                                                                                                            |
| <i>Partially Compliant</i>          | PC                | 1       | <i>Minor improvements required</i>                                                                                                                                                         |
| <i>Non-Compliant</i>                | NC                | 0       | <i>Major improvements required</i>                                                                                                                                                         |
| <i>Work in Progress</i>             | WiP               | -       | <i>Environmental management measures are underway but not yet fully implemented or verified, requiring further monitoring and assessment.</i>                                              |
| <i>Not Applicable / Not Audited</i> | NA                | -       | <i>No improvements required and / or the condition is either not, not yet or no longer relevant at the time of the audit</i>                                                               |
| <i>Informative</i>                  | info              | -       | <i>These relate to informative elements that provide either useful information or are descriptive in the explanation and understanding of statements or concepts in the audit criteria</i> |

Each condition has been ascribed a colour-coded status indicator of Compliant (green), Partially Compliant (orange), major-compliant (red), Not Auditable/Audited (grey), Work in Progress (light red) and Informative (blank/white) to assist the reader in determining aspects that require attention to improve on compliance achieved, if and where applicable. No compliance scoring is attributed any of the audit criteria information pertaining to the following three audit status symbols, namely 'NA', 'WiP', and 'info' as they were either not auditable and/or were not applicable/relevant at the time the audit was undertaken. In other words, they are excluded from the overall compliance rating calculations.

An overall compliance rating is calculated as a percentage to provide the reader with an overview of compliance to the relevant audit criteria however each condition should be considered on its own merits as the ratings do not necessarily portray the severity or impact of the reported finding relating to a condition.

## 16 ASSUMPTIONS AND LIMITATIONS

The ECO compliance audit and associated report are based upon the assumptions that:

- i. Documentation provided to the ECO/auditor is factual and true.
- ii. The audit is based purely on the conditions as stipulated in the EAs and EMPs.
- iii. The construction phase is currently underway and operational phase activities are not applicable.
- iv. Documentation / reports were randomly sampled / reviewed in order to accommodate time constraints.
- v. Where visual observations were not possible either due to physical access constraints or safety constraints, the ECO/auditor used other means to determine compliance, either through requesting written evidence provided by contractors / service providers who service the site or via interviews with technical site-based staff.

## 17 CONSULTATION PROCESS

The approach of consultation followed during the environmental audit was based on written (email) and telephonic correspondence between the ECO/auditor and the Environmental Site Compliance Officer which also includes consultation and communication with the EA holder and competent authority in terms of report submission.

## 18 FINDINGS

Findings are listed in the attached checklists, and it should be noted that findings should be considered individually in the context of the full audit and each condition and associated rating.

The following findings were noted onsite:

- Alien vegetation was observed on the cleared PV areas and stockpiles.
- Access road in bad condition due to erosion and water ponding.
- Erosion has occurred on the roads and the PV areas.
- Some trenches were not barricaded, the EMPr requires trenches to be barricaded at the end of end working day.
- Cleared vegetation is not being removed to the landfill site on time which has resulted in some of the cleared vegetation being eroded dispersing alien vegetation seed.
- Majority of machinery was standing with no drip trays increasing the chances of spillages causing soil and water pollution
- Chemical bunds are not equipped with oil separators and contaminated water is flowing on the ground.
- Cigarette stumps were found on the ground at the access gate.

Based on the outcomes of the audit it was established that the objectives of the EAs and EMPrs were achieved in terms of:

- i. *Sufficiently providing for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis.*
- ii. *Ensuring compliance with the provisions of environmental authorisation and EMPr.*

### 18.1 Minor improvements required.

- Use drip trays on all standing equipment.
- Remove cleared alien to the landfill site.
- Remove cigarette stumps on the ground and provide a container to put stubs.

### 18.2 Major improvements required.

- Clearance of alien vegetation must be done on all affected areas.

- Road maintenance must be done.
- Waste must be removed more frequently onsite.
- Install draining systems and oil separators on the chemical bunds.
- All trenches must be barricaded.
- Stormwater measures must be implemented.

## 19 AUDIT SUMMARY

In terms of the findings and results of the **November 2025** ECO audit, the project achieved an overall **97.00 % compliance** rating with the conditions of the EAs and EMPs.

**Table 4:** Compliance Scoring

| No.                                       | Audit criteria                                                                             | Compliant (C) | Partially Compliant (PC) | Major-non-Compliant (NC) | Work in Progress | Normative (info) | Not Applicable / Not Audited (NA) | Percentage Score      |
|-------------------------------------------|--------------------------------------------------------------------------------------------|---------------|--------------------------|--------------------------|------------------|------------------|-----------------------------------|-----------------------|
| 1                                         | Environmental Authorisation for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1) | 24            | 1                        | 0                        | 1                | 20               | 2                                 | (98%)                 |
| 2                                         | Environmental Authorisation for Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)   | 24            | 1                        | 0                        | 1                | 20               | 2                                 | (98%)                 |
| 3                                         | Environmental Authorisation for Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)   | 24            | 1                        | 0                        | 1                | 20               | 2                                 | (98%)                 |
| 4                                         | EMPr for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)                        | 253           | 23                       | 0                        | 0                | 15               | 29                                | (96%)                 |
| 5                                         | EMPr Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)                              | 250           | 26                       | 0                        | 0                | 16               | 28                                | (95%)                 |
| 6                                         | EMPr Virginia 3 Solar Park (DFFE REF NO: 14/12/16/3/3/2/2101)                              | 226           | 15                       | 0                        | 0                | 43               | 39                                | (97%)                 |
| Overall total no. conditions              |                                                                                            | 806           | 67                       | 0                        | 3                | 134              | 102                               |                       |
| Audited conditions                        |                                                                                            | 1612          | 67                       | 0                        | -                | -                | -                                 | (Potential max score) |
| Overall Compliance Rating Calculation (%) |                                                                                            | 97.00%        |                          |                          |                  |                  |                                   |                       |

## 20 RECOMMENDATIONS

**Based on the findings identified the following is recommended:**

- Alien vegetation clearance must continue onsite; more resources must be allocated towards alien vegetation removal.
- Contractor to monitor newly cleared areas for alien vegetation establishment,
- All trenches must be barricaded at the end of each working day.
- All equipment must be equipped with a drip tray.
- Cleared alien vegetation must be taken to the landfill.
- Road must be maintained to correct the effects of erosion and water ponding.
- Stormwater measures must be implemented, measures to be implement must align with the current conditions onsite.
- Drip trays must be used on all standing equipment including trucks waiting to be onboarded. .
- Waste must be removed from the waste area more frequently to prevent overstocking the waste area.
- To ensure berms are protected from erosion indigenous vegetation must be planted.

## 21 CONCLUSION

The contractor must ensure that systems and resources to monitor and manage environmental risks and impacts adequately are in place. Resources and personnel to train employees on the contents of the EMPs must be made to ensure that the project runs effectively and efficiently with minimal impact to the biophysical and socio-economic environment.

In general, the EMPs are effective in their current format in terms of content and relevance and there are no major shortcomings. The EMP's sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with this project.

**PREPARED BY:**

A handwritten signature in black ink, appearing to read 'Sakaunda'.

**Sakaunda Jennipher**

Environmental Control Officer

NCC Operations (Pty) Ltd

**M** ·069 510 7630

**E** · [jenniphers@ncc-group.co.za](mailto:jenniphers@ncc-group.co.za)

**REVIEWED BY:**

A handwritten signature in black ink, appearing to read 'Nick Gates'.

**Nick Gates**

Senior Environmental Consultant

NCC Operations (Pty) Ltd

**M** ·073 1998 431

**E** ·[nickg@ncc-group.co.za](mailto:nickg@ncc-group.co.za)



## ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

### Open Concerns/Complaint

| No | Observation date | Concern/Complaint | Suggested Due Date <sup>1</sup> | Proposed Corrective Action | Status | Closure status |
|----|------------------|-------------------|---------------------------------|----------------------------|--------|----------------|
|    |                  |                   |                                 |                            |        |                |

*\*The concerns register is updated once the ECO is present on site.*

### Closed Concerns

| No | Observation date | Concern/Complaint | Due Date suggested by ECO | Corrective Action Taken | Outcome | Closure status |
|----|------------------|-------------------|---------------------------|-------------------------|---------|----------------|
|    |                  |                   |                           |                         |         |                |
|    |                  |                   |                           |                         |         |                |

## ANNEXURE B - NCR REGISTER

| Ref No. | Originator | Dated Issued | Description | Proposed Corrective Action | Closure Status | Closure Date | Further Action Required |
|---------|------------|--------------|-------------|----------------------------|----------------|--------------|-------------------------|
|         |            |              |             |                            |                |              |                         |

## ANNEXURE C - INCIDENT REGISTER

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                     | Volume                                   | Remedial Action                                              |                                                                                |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                  |                                          | Immediate<br>Corrective<br>Actions                           | Preventative<br>measures                                                       |
| 20/03/2025 | Waste water                                                                                     | Soil pollution                                                                               | On 20, 2025, at approximately 8:28, the conservative tank being used to collect wastewater from conservancy tank had overfilled, and a Spillage had occurred spillage of approximately 8-10 litres of wastewater mixed with the cleaning material. the toilet supplier attended to the spill immediate & initiated spill Clean-up. Contaminated soil was taken to the hazardous waste skip. | 10 l (below<br>Section 30<br>threshold ) | Clean- up must be done as soon as the spills are identified. | The conservancy tank must be emptied more frequently to reduce overfilling.    |
| 19/03/2025 | Waste water                                                                                     | Soil pollution                                                                               | Approximately 12 litres of wastewater mixed with the cleaning chemicals where toilets are located. The toilet had been leaking since the previous day and wastewater was contained in a drip tray. The toilet supplier was notified, and he came to service. The toilets; however, during servicing; the drip tray spilled over causing the spillage of the wastewater onto the ground.     | 12l (below<br>Section 30<br>threshold )  | Clean- up must be done as soon as the spills are identified. | Leaking toilets must not be allowed onsite.                                    |
| 08/03/2025 | Diesel spillage                                                                                 | Soil pollution                                                                               | On 08 March 2025 at 05:30, security supervisor discovered a diesel leakage during the morning patrol. The spillage occurred due to the diesel injectors that were loose one of them was not properly fitted and diesel pressure removed them while the bakkie was in motion.                                                                                                                | 20l (below<br>Section 30<br>threshold )  | Clean- up must be done as soon as the spills are identified  | Vehicles must be maintained regular. only road worthy vehicles must be onsite. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                 | Volume                                    | Remedial Action                                             |                                                                                |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                              |                                           | Immediate Corrective Actions                                | Preventative measures                                                          |
| 07/03/2025 | Water and antifreeze                                                             | Soil pollution                                                             | The Driver parked the minibus on site, shortly a leak observed containing a mixture of water and antifreeze, while also exhibiting signs of overheating.                                                                                                                                                                                                                | -                                         | Clean- up must be done as soon as the spills are identified | Vehicles must be maintained regular. only road worthy vehicles must be onsite. |
| 06/05/2025 | Water mixed with antifreeze spillage                                             | Soil pollution                                                             | On 6 May 2025 at 14:00, the TLB Operator was busy moving spoil material near the access road to the allocated spoil Stockpile area, when the TLB, radiator fan belt snapped & the container that stores water & antifreeze busted. Approximately 5 Liters of water with antifreeze spilled                                                                              | 5 litres<br>(below Section 30 threshold ) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.                  |
| 08/05/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | A chemical toilet in PV3 at the laydown area at around 3:53 pm, 08 May 2025 was reported to be leaking, when the toilet was assessed, it was identified that there was a broken pipe that leaked the chemical water. An immediate action was taken to clean up the spillage. The contaminated soil was collected into the bags and taken to site waste management area. | 6 litres (below Section 30 threshold )    | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent.         |
| 12/05/2025 | Diesel spillage                                                                  | Soil pollution                                                             | On 12-05-2025 at 06:40, the ambulance was on the way to the access control point along the main access road, when it had a sudden breakdown and diesel was spilled along the access road, leaving a trail of diesel spill for approximately+ -400 Metres. Approximately +-2 Litres of diesel was spilled                                                                | 2 litres (below Section 30 threshold)     | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.                  |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Volume                                                  | Remedial Action                                              |                                                                                      |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                         | Immediate<br>Corrective<br>Actions                           | Preventative<br>measures                                                             |
| 15/05/2025 | Hydraulic oil<br>spillage                                                                       | Soil pollution                                                                               | On the 15/05/2025, a side tipper truck was transporting spoil material when the cylinder failed and spilled ~7 litres of hydraulic oil, about 455m from the nearest watercourse. The contaminated soil was promptly cleaned up.                                                                                                                                                                                                                                                                                                                  | 7 litres ( <i>below<br/>Section 30<br/>threshold</i> )  | Clean- up must be done as soon as the spills are identified  | All Vehicles must be serviced regularly to reduce breakdowns.                        |
| 20/05/2025 | Toilet Cleaner<br>mixed with water<br>spillage                                                  | soil pollution                                                                               | It was around 11:30 am when it was reported that there was a spillage, that when the Fidamo team was about to clean the toilets at Pv1 Laydown area, a pipe from the generator busted and the water leaked from the broken pipe. The water that spilled was approximately 3-4 Liters and the pipe was immediately stopped. The chemical that was in the water is blue splash Toilet chemical. An immediate action was taken to clean up the spillage. The contaminated soil was collected into the bags and taken to site waste management area. | 4 litres ( <i>below<br/>Section 30<br/>threshold</i> )  | Clean- up must be done as soon as the spills are identified  | The maintenance/servicing of the toilets is to be made more stringent.               |
| 21/05/2025 | Fauna                                                                                           | Loss of<br>biodiversity                                                                      | On the 21/05/2025 a snake was fatally wounded during the internal road construction works.                                                                                                                                                                                                                                                                                                                                                                                                                                                       | N/A                                                     | The dead animal was buried.                                  | N/A                                                                                  |
| 26/05/2025 | Hydraulic oil<br>spillage                                                                       | Soil pollution                                                                               | On 26/05/2025, at around 16:50 a drill rig operator noticed a leak from the machine, he immediately reported the leak to the supervisor. The supervisor called the mechanic but did not report the spillage. The oil further spilled to the soil during the repair attempts which were done under poor lighting. The spillage was left overnight and was only reported to the EO the next morning when the shift began.                                                                                                                          | 25 litres ( <i>below<br/>Section 30<br/>threshold</i> ) | Clean- up must be done as soon as the spills are identified. | The ESCO issued NCR to the subcontractor for failing to report spillage immediately. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                             | Volume                                                                     | Remedial Action                                                                                            |                                                                                                               |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                            | Immediate Corrective Actions                                                                               | Preventative measures                                                                                         |
| 11/06/2025 | Concrete and oil Spillage                                                        | Soil pollution                                                             | On the 11 <sup>th</sup> of June 2025 the concrete mixer truck overturned resulting in the spillage of an estimated 3m3 (3 cubic meters) of concrete and approximately 8litres of diesel. The contractor removed the spilled concrete and dumped it on the natural area adjacent to the road                                                                                                                                                         | 8 litres of diesel and 3m3 of concrete <i>(below Section 30 threshold)</i> | Clean- up must be done as soon as possible and an investigation must be done on the cause of the accident. | The ESCO issued an NCR to the subcontractor for failing to report dumping concrete on the natural vegetation. |
| 16/06/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | At 08:32am, on the 16th of June 2025, The Client (Robin) reported that ABLON's Ablution facilities were leaking which resulted to soil contamination, we immediately stopped everyone from using the Toilet and reported the issue to our service provider. A drip tray was placed immediately underneath the toilet. The event occurred at the OHL Site Camp and the name of the chemical that spilled on the ground is Portabloo Toilet Chemical. | 30 litres <i>(below Section 30 threshold )</i>                             | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin.        | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced.              |
| 24/06/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | At around 8 am on the 24/06/2025 a spillage was reported by the contractor. Approximately 30 litres of Toilet Blue was spilled at the Virginia 1 laydown area. The spillage was cleaned up and the contaminated soil removed for disposal.                                                                                                                                                                                                          | 30 litres <i>(below Section 30 threshold )</i>                             | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin.        | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced.              |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Volume                                          | Remedial Action                                                                                                                                    |                                                                                                  |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                 | Immediate Corrective Actions                                                                                                                       | Preventative measures                                                                            |
| 08/07/2025 | Hydraulic Oil Spillage                                                           | Soil pollution                                                             | A tipper truck spilled some hydraulic oil when the driver was offloading some excavated material at PV2 I8 road on the 08h of July 2025. The driver lifted the truck to off load the material when it was halve way up, he discovered that the body of the truck was swinging to the sides and he tried to stop, and discovered some oil leaks from the hydraulic cylinder, about +-9 litres of oil spilled to the ground and it was reported to the EO, immediately the supervisor and the driver cleaned the spillage and the contaminated soil was collected into bags and taken to ABC Solar Waste management area. | 30 litres ( <i>below Section 30 threshold</i> ) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin.                                                | Vehicles that are constantly breaking down must be moved off site.                               |
| 08/07/2025 | Hydraulic Oil Spillage                                                           | Soil pollution, Loss of vegetation                                         | A tipper truck spilled some hydraulic oil when the driver was offloading some excavated material at PV2 I8 road on the 08h of July 2025. The driver lifted the truck to off load the material when it was halve way up, he discovered that the body of the truck was swinging to the sides and he tried to stop, and discovered some oil leaks from the hydraulic cylinder, about +-9 litres of oil spilled to the ground and it was reported to the EO, immediately the supervisor and the driver cleaned the spillage and the contaminated soil was collected into bags and taken to ABC Solar Waste management area. | +/-9L                                           | The spillages were cleaned, and the contaminated soil was removed and stored in bags and taken to waste management area at ABC solar laydown area. | Vehicles that are constantly breaking down must be moved off site.                               |
| 13/08/2025 | Sewage spillage                                                                  | Soil pollution, Loss of vegetation                                         | A pipe from the pump got broken when the driver was reversing and it started to spill approximately 4 liters of sewage water, at PV2 block 15 at 2:18 pm and immediately after noticing the spills, he immediately stopped the car. He immediately cleaned and it was reported to the EO. Proper cleaning was further done by Fidamo's (toilet supplier) team members.                                                                                                                                                                                                                                                  | 4                                               | The spillages were cleaned, and the contaminated soil was removed and stored in bags and taken to waste management centre in Virginia 3.           | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                | Volume   | Remedial Action                                                                                                                                |                                                                                                  |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                             |          | Immediate<br>Corrective<br>Actions                                                                                                             | Preventative<br>measures                                                                         |
| 15/08/2025 | Toilet chemical spillage                                                                        | Soil pollution                                                                               | Toilet chemical spill at Tower 29. The Toilet Pump burst, and the chemical spilled into the ground contaminating the soil. The Environmental Officer immediately attended to the spill. A drip tray was placed immediately under the Toilet to contain the spillage. The volume of the chemical spill is approximately 4.5liters A spade is used to remove the contaminated soil. The contaminated soil was placed inside a hazardous waste bin.       | +/- 4.5L | The spillages were cleaned, and the contaminated soil was removed and stored in bags and taken to waste management area at Ablon laydown area. | The cause of the spillages must be investigated. Toilets that continue to leak must be replaced. |
| 26/08/2025 | Engine oil spillage                                                                             | Soil pollution                                                                               | A tractor towing a trailer filled with poles experienced an engine malfunction, resulting in the leakage of at least 7 litres of engine oil on the main access road near the MV trenches.                                                                                                                                                                                                                                                              | +/- 7L   | Absorbent material was used to absorb the engine oil from the compacted gravel road and later taken for disposal as hazardous waste.           | Vehicles that are constantly breaking down must be moved off site                                |
| 09/09/2025 | Toilet chemical spillage                                                                        | Soil pollution                                                                               | A chemical toilet in PV1 block 1 around 9:00 am, 09 September 2025 was reported to be leaking, when the toilet was assessed, it was overfull that resulted in overflowing. An immediate action was taken to clean up the spillage, however during the cleaning process the weather changed we experienced some lightning, and they had to stop. It was about 8-10 litres of chemical water that spilled. Then after lunch the weather was conducive to | +/- 9L   | The spillage was cleaned, and the contaminated soil was removed and stored in bags,                                                            | The cause of the spillages must be investigated. Toilets that continue to leak must be replaced. |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                             | Volume  | Remedial Action                                                                                   |                                                                                                  |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|---------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                          |         | Immediate<br>Corrective<br>Actions                                                                | Preventative<br>measures                                                                         |
|            |                                                                                                 |                                                                                              | proceed with work, and they properly cleaned the spillage, and the contaminated soil was collected into                                                                                                                                                             |         | taken to ABC lay down.                                                                            |                                                                                                  |
| 12/09/2025 | Toilet chemical spillage                                                                        | Soil pollution                                                                               | At 10:58 while on the way to use the toilet Wanga witnessed that the toilet is leaking & reported immediately to the HDEC EO.                                                                                                                                       | +/- 10L | Drip trays placed to contain the leakage. Absorbent was spread on the area where spill occurred.  | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 01/10/2025 | Toilet chemical spillage                                                                        | Soil pollution                                                                               | Approximately 8 litres of water and toilet blue mixture was spilled, a drip tray was placed under the toilet however not at the leaking points.                                                                                                                     | +/- 8L  | The spillage was cleaned, and the contaminated soil was removed and stored in bags, taken to WMC. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 02/10/2025 | Toilet chemical spillage                                                                        | Soil pollution                                                                               | A pipe from the pump inside the mobile toilet broke and started leaking, which caused a spillage that was discovered by EO. Approximately 10 liters of toilet blue chemical spilled. Upon discovery the service provider was notified and attended to the spillage. | +/-10L  | The spillage was cleaned, and the contaminated soil was removed to WMC.                           | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |



| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Volume   | Remedial Action                                                                                                                                                                      |                                                                                                  |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |          | Immediate<br>Corrective<br>Actions                                                                                                                                                   | Preventative<br>measures                                                                         |
| 03/10/2025 | Hydraulic oil<br>spillage                                                                       | Soil pollution                                                                               | A hydraulic oil pipe on a front-end loader burst, resulting in a spill of nearly 10 liters of hydraulic oil. The operator stopped the equipment, informed the supervisor and put a drip tray beneath the machine. A cleanup was conducted around the machinery while waiting for a mechanic to arrive. Once on site, the mechanic repaired the pipe and then moved the machine to clean the area underneath the loader.                                                                                                                                                                                                                                                                                                                                                        | +/-10L   | The spillage was cleaned, and the contaminated soil was removed to WMC.                                                                                                              | Vehicles that are constantly breaking down must be moved off site                                |
| 13/10/2025 | Toilet chemical<br>spillage                                                                     | Soil pollution                                                                               | The pump had a fault and stopped working which resulted in the Blue chemical spillage to the ground. Approximately 8 liters of Toilet Blue Chemical spilled. Upon discovery the service provider was notified and attended to the spillage.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | +/- 8L   | Drip trays placed to contain the leakage. Absorbent was spread on the area where spill occurred.                                                                                     | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 21/10/2025 | Hydraulic oil<br>spillage                                                                       | Soil pollution                                                                               | On the 21/10/2025 the Operator inspected his machine while completing his checklist, and everything was fine with no leaks, it was around 9:00 am, he removed the drip tray under the drilling machine and started the machine to warm up. When he released the rev-count the assistant operator from the machine that I was close to him called trying to make him aware that the machine was leaking, then he stopped the machine immediately switched off and saw the machine leaking, he put back the drip tray to collect the hydraulic oil unfortunately the oil had already gushed out, it was about 20-25 liters of hydraulic oil. When he checked the machine again, he found out that the hydraulic pipe has disjoined. Then reported to the safety officer on site. | 20 -25 L | Immediately the spillage was contained, absorbent and pillows were used to contain the spillage. A TLB was used to clean up the contaminated soil and loaded in a skip bin and taken | Vehicles that are constantly breaking down must be moved off site                                |



| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Volume | Remedial Action                                                                                                                                                                                                                                                                                                 |                                                                    |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |        | Immediate Corrective Actions                                                                                                                                                                                                                                                                                    | Preventative measures                                              |
|            |                                                                                  |                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |        | to waste management area                                                                                                                                                                                                                                                                                        |                                                                    |
| 24/10/2025 | Diesel spillage                                                                  | Soil pollution                                                             | On 23 October 2025, at approximately 10:52, an environmental incident occurred at PV3 Raubex Infra laydown area involving a diesel spill. The spill resulted from a fault in the site generator, which led to the release of diesel into the ground surface which was about 9l. The contaminated soil was disposed of to a hazardous waste skip at the Waste management facility at PV3. All necessary steps were taken to ensure the spill was contained and cleaned up efficiently, minimizing potential harm to the surrounding environment. | 9 L    | Immediate action was taken to contain the spill using spill kit absorbents available on site. The incident was promptly reported to the Construction Manager and Environmental Officer. To mitigate further environmental impact, a TLB (Tractor-Loader-Backhoe) was dispatched to assist with the cleanup. The | Vehicles that are constantly breaking down must be moved off site. |



| Date | Type                                                                                           | Impact                                                                                       | Description of Incident                    | Volume | Remedial Action                                                                                          |                          |
|------|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|--------------------------------------------|--------|----------------------------------------------------------------------------------------------------------|--------------------------|
|      | Chemical Spill/<br>Sewage/ Waste/<br>Fauna &Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen? |        | Immediate<br>Corrective<br>Actions                                                                       | Preventative<br>measures |
|      |                                                                                                |                                                                                              |                                            |        | contaminated soil<br>was collected and<br>placed into black<br>bags designated<br>for hazardous<br>waste |                          |

## **ANNEXURE D – PHOTOGRAPHS**



**Figure 1:** Condition of the access road

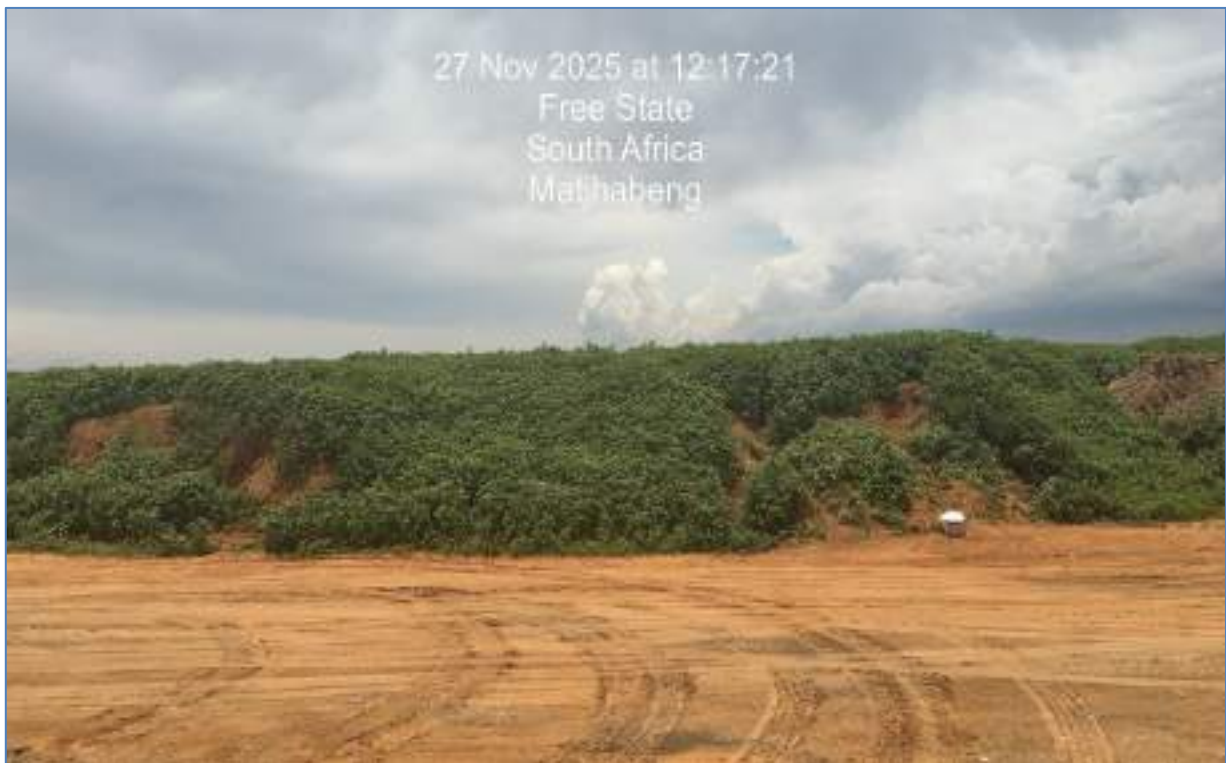


**Figure 2:** Alien Vegetation.





**Figure 3:** Poor waste management practices



**Figure 4:** Overflowing sump at the waste area



**Figure 5:** Maggots in standing water at the waste area.



**Figure 6:** Cigarette buds on the ground





**Figure 7:** Damage caused rainwater



**Figure 8:** Machinery standing without drip trays





**Figure 9:** Open trenches left open unbarricaded.



**Figure 10:** Paint container left open in the rain



**Figure 11:** Newly constructed diesel bund.

**THIS PAGE WAS INTENTIONALLY LEFT BLANK**

**DECEMBER 2025**



---

# ECO MONTHLY ENVIRONMENTAL MONITORING REPORT

Virginia OPHL Line and Switching Station Matjhabeng,  
Lejweleputswa District Municipality within the jurisdiction  
of the Free State Province.

---

**PREPARED FOR:**

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

Department of Forestry, Fisheries, and the Environment: Compliance Monitoring

**DATED:**

December 2025

**PREPARED BY:**

NCC Operations

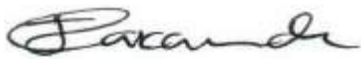
T • 021 702 2884

E • [info@ncc-group.co.za](mailto:info@ncc-group.co.za)

## DECLARATION OF INDEPENDENCE

I, Jennipher Sakaunda, as duly authorised representative of NCC Operations (Pty) Ltd ("**NCC**"), hereby confirm my independence (as well as that of NCC) as an auditor and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which URSA Energy (Pty) Ltd has appointed NCC as Environmental Control Officer ("**ECO**"), other than fair remuneration for work performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'J Sakaunda', is positioned below the 'Signed:' text.

**Jennipher Sakaunda**

15 January 2026

Environmental Control Officer

NCC Operations (Pty) Ltd

## **LIABILITY DISCLAIMER AND CONFIDENTIALITY CLAUSE**

All inspections conducted, as well as reports and recommendations provided by NCC are purely advisory. They are primarily intended for the purpose of assisting clients in loss control, risk management as well as health, safety, and environmental procedures.

Observations and recommendations are the result of practices and conditions observed, and information made available to us in various forms at the time of our visit. They do not purport to refer to or guarantee compliance with local or government regulations which may be applicable to such practices and conditions. This report should not be considered a definitive listing of all existing risks nor an absolute solution to all indicated risks, or hazards present from time to time in the Client Organisation. The report should always be considered in its entirety; individual sentences, paragraphs or sections of the report should not be used in isolation.

This report should not be reproduced except in its entirety, including this liability disclaimer or contents reproduced or disclosed to any third party without the prior written approval of NCC.

NCC assumes no responsibility for any losses incurred as a result of the implementation, management, and operation of recommended health, safety and environmental systems, processes and procedures.

## DOCUMENT CONTROL

|                     |                                             |
|---------------------|---------------------------------------------|
| <b>REPORT TITLE</b> | Monthly ECO Environmental Monitoring Report |
| <b>PROJECT</b>      | Virginia OHPL Line and Switching Station    |
| <b>LOCATION</b>     | Free State Province                         |
| <b>EA HOLDER</b>    | URSA Energy (Pty) Ltd                       |
| <b>ECO</b>          | NCC Operations (Pty) Ltd                    |
| <b>REVISION</b>     | 00                                          |
| <b>DATE</b>         | 15/01/2026                                  |

| Revision | Date       | Description                  |
|----------|------------|------------------------------|
| Rev 00   | 15/01/2026 | First Draft - Internal       |
| Rev 01   | TBC        | Final - Authority submission |

## REPORT DISTRIBUTION LIST

| Name                   | Organisation                      | Issued     | Format     |
|------------------------|-----------------------------------|------------|------------|
| Janine Brasington      | Red Rocket South Africa (Pty) Ltd | 15/01/2026 | Electronic |
| Tarryn Frankland       | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Maggie Logan           | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Director of Compliance | DFFE                              | TBC        | Electronic |



## TABLE OF CONTENTS

|                                                    |           |
|----------------------------------------------------|-----------|
| <b>TABLE OF FIGURES .....</b>                      | <b>7</b>  |
| <b>ABBREVIATIONS .....</b>                         | <b>8</b>  |
| <b>1 INTRODUCTION .....</b>                        | <b>9</b>  |
| 1.1 Background.....                                | 9         |
| 1.2 Audit Scope and Purpose.....                   | 11        |
| 1.3 Monitoring Frequency and Reporting.....        | 11        |
| <b>2 AUDITOR BACKGROUND.....</b>                   | <b>12</b> |
| <b>3 GENERAL (NOTABLE EVENTS) .....</b>            | <b>13</b> |
| 3.1 General Outstanding matters.....               | 13        |
| 3.2 Audits (Internal and External).....            | 13        |
| <b>4 WASTE MANAGEMENT.....</b>                     | <b>14</b> |
| 4.1 Domestic/ General Waste.....                   | 14        |
| 4.2 Hazardous waste.....                           | 14        |
| 4.3 Wastewater .....                               | 15        |
| <b>5 PROTECTIVE MEASURES .....</b>                 | <b>15</b> |
| 5.1 General .....                                  | 15        |
| <b>6 ENVIRONMENTAL CONSERVATION.....</b>           | <b>16</b> |
| 6.1 Conservation of Flora and Fauna.....           | 16        |
| 6.2 Water Management.....                          | 16        |
| 6.3 Soil Management .....                          | 16        |
| 6.4 Stormwater and Erosion onsite .....            | 16        |
| <b>7 INFRASTRUCTURE MANAGEMENT.....</b>            | <b>17</b> |
| 7.1 Access Roads.....                              | 17        |
| 7.2 Fences, Gates, and Barricading.....            | 17        |
| 7.3 Buildings and Structures .....                 | 17        |
| <b>8 SOCIAL RESPONSIBILITY.....</b>                | <b>17</b> |
| <b>9 ENVIRONMENTAL AWARENESS AND TRAINING.....</b> | <b>18</b> |
| <b>10 HERITAGE.....</b>                            | <b>18</b> |
| <b>11 WARNING &amp; NCRS.....</b>                  | <b>18</b> |

|           |                                                        |           |
|-----------|--------------------------------------------------------|-----------|
| <b>12</b> | <b>REHABILITATION .....</b>                            | <b>19</b> |
| <b>13</b> | <b>INCIDENTS AND ACCIDENTS .....</b>                   | <b>19</b> |
| <b>14</b> | <b>MEETINGS AND OTHER CORRESPONDANCE.....</b>          | <b>19</b> |
| <b>15</b> | <b>AUDIT METHODOLOGY.....</b>                          | <b>20</b> |
| 15.1      | Audit Process.....                                     | 20        |
| 15.2      | Observation and Recommendation Determination.....      | 21        |
| 15.3      | Findings.....                                          | 21        |
| 15.4      | Audit Tables and Compliance Ratings.....               | 21        |
| <b>16</b> | <b>ASSUMPTIONS AND LIMITATIONS .....</b>               | <b>23</b> |
| <b>17</b> | <b>CONSULTATION PROCESS.....</b>                       | <b>23</b> |
| <b>18</b> | <b>FINDINGS .....</b>                                  | <b>24</b> |
| 18.1      | Minor improvements required. ....                      | 24        |
| 18.2      | Major improvements required.....                       | 24        |
| <b>19</b> | <b>AUDIT SUMMARY.....</b>                              | <b>26</b> |
| <b>20</b> | <b>RECOMMENDATIONS .....</b>                           | <b>27</b> |
| <b>21</b> | <b>CONCLUSION.....</b>                                 | <b>27</b> |
|           | <b>ANNEXURE A – CONCERNS/COMPLAINTS REGISTER .....</b> | <b>29</b> |
|           | <b>ANNEXURE B - NCR REGISTER .....</b>                 | <b>29</b> |
|           | <b>ANNEXURE C - INCIDENT REGISTER.....</b>             | <b>30</b> |
|           | <b>ANNEXURE D – PHOTOGRAPHS .....</b>                  | <b>39</b> |
|           | <b>THIS PAGE WAS INTENTIONALLY LEFT BLANK .....</b>    | <b>44</b> |

## TABLE OF FIGURES

|                                                                  |    |
|------------------------------------------------------------------|----|
| Figure 1: Water ponding at the substation area .....             | 40 |
| Figure 2: Large quantities of wood pats at the waste area .....  | 40 |
| Figure 3: Rainwater accumulated at Tower No. 13.....             | 41 |
| Figure 4: Overflowing sump at the waste area .....               | 41 |
| Figure 5: Trucks standing without drip trays. ....               | 42 |
| Figure 6: Alien vegetation that must be cleared. ....            | 42 |
| Figure 7: Torn barricading nets must be taken for recycling..... | 43 |
| Figure 8: Crowded chemical bund .....                            | 43 |

## ABBREVIATIONS

|             |                                                         |
|-------------|---------------------------------------------------------|
| <b>BAR</b>  | Basic Assessment Report                                 |
| <b>CA</b>   | Competent Authority                                     |
| <b>DEA</b>  | Department of Environmental Affairs (now DFFE)          |
| <b>DFFE</b> | Department of Forestry, Fisheries, and the Environment  |
| <b>DWS</b>  | Department of Water and Sanitation                      |
| <b>EA</b>   | Environmental Authorisation                             |
| <b>EAP</b>  | Environmental Assessment Practitioner                   |
| <b>ECO</b>  | Environmental Control Officer                           |
| <b>EIA</b>  | Environmental Impact Assessment                         |
| <b>EMPr</b> | Environmental Management Programme                      |
| <b>EO</b>   | Environmental Officer (Contractor)                      |
| <b>ER</b>   | Employer's Representative                               |
| <b>ESCO</b> | Environmental Site Compliance Officer                   |
| <b>kV</b>   | Kilovolt                                                |
| <b>MVA</b>  | Megavolt Amperes                                        |
| <b>MW</b>   | Megawatt                                                |
| <b>NCC</b>  | NCC Operations                                          |
| <b>NCR</b>  | Non-Compliance Report                                   |
| <b>NEMA</b> | National Environmental Management Act (No. 107 of 1998) |
| <b>NWA</b>  | National Water Act (No. 36 of 1998)                     |
| <b>OHPL</b> | Overhead Power Line                                     |
| <b>SDC</b>  | Safe Disposal Certificate                               |
| <b>SHE</b>  | Safety, Health, and Environment                         |
| <b>SS</b>   | Substation                                              |
| <b>TBC</b>  | To Be Confirmed                                         |

# 1 INTRODUCTION

## 1.1 Background

NCC Operations (Pty) Ltd ("**NCC**") was appointed by URSA Energy (Pty) LTD ("**URSA**") to provide a suitably experienced independent Environmental Control Officer ("**ECO**") for the construction phase of Virginia Solar Park which will be connected to the Eskom Theseus Main Transmission Substation ("**MTS**"). The site is located on Farm Blomskraal 216, Ventersburg RD located within the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province. On completion the facility will consist of the Photovoltaic ("**PV**") Power Plant with a maximum generation capacity up to 100 MW, a 132kV powerline connecting the substation to the Eskom Theseus substation which is located 16.2 km North-East of the north-western corner of project site.

The ECO has the responsibility of ensuring the mitigation/ rehabilitation measures and conditions referred to in the Environmental Authorisation ("**EA**") are implemented, as well as ensuring compliance with the requirements of the Environmental Management Programme ("**EMPr**"). This report provides an insight into the overall compliance performance and a summary of other environmental concerns and potential environmental risks through observations during site inspections.

This report is based on the following environmental conditions or requirements:

- a) Environmental Authorisations
  - 1) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
  - 2) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)
- b) Environmental Management Programmes
- c) Relevant environmental legislation.
- d) All other environmental permits, licenses, and authorisations.

The notification of commencement of construction was submitted to the DFFE for Virginia Solar Plant (Pty) Ltd on the 02 May 2024.

This report addresses conditions set out in the EA which states the ECO as part of their duties: *"The ECO must keep record of all activities on site, problems identified, transgressions noted, and a task schedule of tasks undertaken by the ECO."* As per the roles and responsibilities in the Virginia Solar Project ("**VSP**") EMPr, the

primary role of the ECO will be to monitor the construction activities and ensure that the mitigation measures of the EMPr and Environmental Authorisations (EA) are implemented. This report also includes an audit checklist for the VSP EA as follows:

- 1) Virginia Solar Park Switching Station (DFFE Ref No: 14/12/16/3/3/2/2099/2)
- 2) Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)

A summary of the various environmental requirements i.e. the audit criteria relating to the overall project is provided in **Table 1**.

**Table 1:** Summary of environmental requirements / criteria relating to the overall project.

| Components of overall project         | Environmental requirements / criteria |               |                                |              |
|---------------------------------------|---------------------------------------|---------------|--------------------------------|--------------|
|                                       | DFFE EA Ref No.                       | Issue date    | Approved EMPr<br>(Compiled by) | Date         |
| Virginia Solar Park Switching Station | 14/12/16/3/3/2/2099/2                 | 20 April 2022 | Terramanzi Group (Pty) Ltd     | October 2023 |
| Virginia Solar Park OHPL              | 14/12/16/3/3/1/2444                   | 02 Feb 2022   | Terramanzi Group (Pty) Ltd     | October 2023 |

This report represents the monitoring for the Construction Phase. The responsibility of enforcement of the conditions of the EAs and EMPrs lies with the Project and Project Manager, while the Department of Forestry, Fisheries, and the Environment ("DFFE") Environmental Management Inspectorate ("EMI") may also enforce existing and potentially new conditions through compliance notices.

An Environmental Site Compliance Officer ("ESCO") has been appointed by the holder of the EA to monitor the project compliance onsite on a full-time basis on behalf of the EA holder. The responsibilities of the ESCO includes:

- Monitoring conditions of the Basic Assessment Reports ("BARs"), Environmental Impact Report (EIR) EAs and the EMPrs.
- Ensuring compliance with all relevant environmental legislation.
- Approving method statements (reviewed by the ECO and co-approved by Site Manager).
- Remaining employed until the completion of the construction activities.
- Reporting to the Project Manager, including all findings identified onsite.

- Reporting any significant findings to the ECO.
- Preparing and submitting monthly reports to the ECO and Project Manager.
- Monitoring compliance by the Contractor.

In addition, the ESCO will:

- Undertake daily inspections of the site and surrounding areas.
- Audit compliance with the EMPr and conditions of the environmental authorisation.
- Take appropriate action if the specifications contained in the EMPr and conditions of the environmental authorisation are not followed.
- Monitor and verify that environmental impacts are kept to a minimum, as far as possible; and
- Ensure that activities onsite comply with all relevant environmental legislation.

## 1.2 Audit Scope and Purpose.

In accordance with Regulation 34 of the 2014 NEMA EIA Regulations (as amended) the holder of an environmental authorisation must, for the period during which the EA and EMPr, and where applicable the closure plan, remain valid —

- Ensure that the compliance with the conditions of the EA and the EMPr, and where applicable the closure plan, is audited; and*
- Submit an environmental audit report to the relevant competent authority.*

The purpose of this environmental audit is to verify compliance to the overarching environmental requirements specified as conditions of the EAs and EMPrs, and report on the extent to which the objectives of the EMPrs and are being achieved.

## 1.3 Monitoring Frequency and Reporting.

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 17<sup>th</sup> of December 2025 after which this report was compiled which serves to document and audit. This report covers the monthly reporting for the month of December 2025.

## 2 AUDITOR BACKGROUND

NCC is a multi-disciplinary environmental consulting company based in South Africa which adopts a 'values driven' approach with a common purpose to conserve and create sustainable environments that enable people, planet and business to thrive. We are a trusted partner to major engineering and construction firms, mines, parastatals, film, sports and event production companies, municipalities, provincial and national government, and conservation organisations. Drawing on our years of experience on a wide range of projects, NCC works with our clients to develop, implement, and monitor customised services that add real value.

The auditor, **Jennipher Sakaunda**, is a senior environmental manager with more than 14 years' experience currently employed with NCC. Jennipher Sakaunda has experience in several environmental fields including environmental compliance monitoring and auditing, due diligence assessment, environmental impact and risk assessment, and compilation of environmental management plans/programmes.

**Table 2:** Details of the auditor.

|                       |                                                                                                                                                                                                |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Company</b>        | NCC Operations (Pty) Ltd                                                                                                                                                                       |
| <b>Auditor</b>        | Jennipher Sakaunda                                                                                                                                                                             |
| <b>Tel</b>            | +27 21 702 2884                                                                                                                                                                                |
| <b>Mobile</b>         | +27 69 510 7630                                                                                                                                                                                |
| <b>Email</b>          | <a href="mailto:jenniphers@ncc-group.co.za">jenniphers@ncc-group.co.za</a>                                                                                                                     |
| <b>Address</b>        | 26 Bell Close, Westlake Business Park Westlake, 7945                                                                                                                                           |
| <b>Affiliation</b>    | International Association of Impact Assessment South Africa.<br>Environmental Assessment Practitioner Association of South Africa.<br>South African Council of Natural Scientific Professions. |
| <b>Qualifications</b> | BSc (honors) Environmental Management                                                                                                                                                          |
| <b>Expertise</b>      | A detailed CV can be provided on request.                                                                                                                                                      |



### 3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (December 2025) included the following:

- Excavation of monopole foundations.
- Cast blinding slab and steel fixing at the OHPL
- Erection of monopole towers at the OHPL.
- Filling and compaction of borrow material.
- Construction of the internal road connecting the access road to the Temporary Site Offices (TSF) and Switching Station.
- Excavation and shuttering works for the IPP substation.
- Steel fixing and Erection of monopole towers at the OHPL

#### 3.1 General Outstanding matters

Any major outstanding matters are to be recorded and summarised in the Concerns Register (**Annexure A**). The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

#### 3.2 Audits (Internal and External)

Internal audits are undertaken monthly by the Red Rocket ESCO. This ECO Audit was undertaken on the 17<sup>th</sup> of December 2025. Audit tables/checklists are attached to this report. The ECO undertakes external monthly audits.

## 4 WASTE MANAGEMENT

The contractor must make provision for waste avoidance, minimisation, and separation of waste where possible through recycling efforts. Waste management awareness must be done on an ongoing basis and must be provided through toolbox talks and awareness posters. A waste station was constructed at V3 where waste is temporarily stored, sorted and recycled. The waste station includes a bund where waste will be stored and various compartments where waste will be sorted into. Recyclables are being stored until there are enough quantities to transport to Mpact for recycling. Waste must be removed more frequently to prevent stocking large quantities onsite.

### 4.1 Domestic/ General Waste

A total of **4 465 kg** of general waste was generated on site in the month of December 2025; **2 115 kg** constituting boxes and wooden pallets were recycled. A total of **2350 kg** of waste were disposed at the Matjhabeng Local Municipality waste disposal site. Waste bins are placed along the OHPL line where each team will be working, at the end of the day waste is collected and placed at the laydown areas for temporary storage. Designated waste areas have been provided at the contractors' main site offices/laydown areas for purposes of temporary storage of waste prior to collection and transferal to the licensed waste facilities. Bins at the laydown area are colour coded for each waste type. The contractor has commenced with taking waste for recycling.

The service providers dispose the general waste at Matjhabeng Local Municipality waste disposal site-Licence number: B33/2/340/21/P8 16/2/7/C404/D2/Z1/P367. Proof of disposal is available on request.

### 4.2 Hazardous waste

Hazardous waste skips are available at the dedicated waste storage area at each of the sub-contractors' site offices/lay down areas. The contractor disposed **6520 kg** of hazardous waste in December 2025. Hazardous waste in form of oil spillages, cement spillages and contaminated soil is kept onsite until there is enough to dispose. No major spillages have been recorded on site.

### 4.3 Wastewater

Approximately **48 633.67 L** of sewerage waste was generated on site in the month of December 2025. Chemical toilets and a conservancy tank have been provided onsite. No major spillages incidents were recorded from the chemical toilets. The contractor must ensure these chemical toilets are serviced regularly and drip trays are placed under each toilet.

The General Authorisation that was issued by DWS for the includes the use of a conservancy tank up to a capacity of 50 000 L. The conservancy tank onsite has a capacity of 12 500 L which is below the stipulated GA threshold. The contractor must ensure that this capacity is not exceeded.

The Appointed Service Provider removes sewage and disposes of it at Matjhabeng Local Municipality wastewater treatment facility - Licence No: 10/D4/J/G/2082. Proof of disposal is available onsite. The contractor must ensure the appointed service provider is licenced to provide sewer removal services. With the work being spread out on the lines the contractor must ensure ablutions are within walking distance within the areas where people are working.

## 5 PROTECTIVE MEASURES

### 5.1 General

Protective measures have been deployed to mitigate environmental impacts or prevent impacts from occurring which includes:

- Security guards are present on the site, with access control in place.
- Induction training is conducted for all persons working and visiting the site.
- Snake gaiters are provided.
- Spill kits are available on site.
- No-go areas are demarcated and provided with signage.
- Access cards are used to enter and exit the site.
- Rapid alcohol detecting is in place.

## 6 ENVIRONMENTAL CONSERVATION

### 6.1 Conservation of Flora and Fauna

A permit to clear the site and relocate species of concern was received from the Free state Department of Economic, Small Business Development, Tourism and Environmental Affairs. The permit with Ref No. 202306000012649 was issued on 08/06/2023 to pluck protected and unprotected flora.

Clearance of alien vegetation is in progress onsite, however the given the extend of the site the pace is too slow to eradicate the alien vegetation onsite. More resources must be allocated towards alien vegetation removal. It is important that the contractor clears all the alien vegetation as some of the alien plants will soon be dispersing seed creating a seed bank. The contractor must monitor the cleared areas to ensure alien vegetation does not re-establish. The contractor must make an effort to remove the stockpiled alien vegetation to the Matjhabeng Local Municipality for disposal.

### 6.2 Water Management

The contractor abstracted **818 m<sup>3</sup>** of water from Sluice 16 and **198 m<sup>3</sup>** water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The GA allows for abstraction of 43 000m<sup>3</sup> annually, the contractor must ensure water abstraction does not exceed the licenced volumes. The wetland area around tower 13 has accumulated rainwater, the contractor must limit activities around the wetland area until a time when the wetland area has dried up.

### 6.3 Soil Management

Cleared topsoil has been stockpiled along the OHPL line and the switching station. These must be protected from erosion and alien vegetation establishment. In some areas where the contractor has finished pouring concrete and the pits have closed. The contractor must ensure subsoil is used for infilling. Topsoil must only be spread after the structures have erected to prevent compaction.

### 6.4 Stormwater and Erosion onsite

The contractor's Stormwater Management Plan was approved, although measures to manage erosion as per the approved SWMP have been implemented signs of erosion and water ponding were observed. The SWMP must be revised to reflect the current conditions onsite. Measures to divert clean stormwater away from the works towards the watercourses must be implemented.

## **7 INFRASTRUCTURE MANAGEMENT**

### **7.1 Access Roads**

The project team is using existing farm roads for current construction activities until such time as the project access roads and internal roads have been constructed. Since water ponding and erosion were observed on the roads maintenance work must be done. Maintenance of the access roads must be done on a regular basis.

### **7.2 Fences, Gates, and Barricading**

The site is fenced with security personnel manning the gates. Access cards are used to allow entrance to site. Barricading was observed on site, and such should continue to be maintained around all open excavations along the OHPL servitudes to prevent potential fauna (wildlife and livestock) incidents. The contractor has put temporary fences which is more secure on some of the pits where work will continue at a later stage. Pits with ground water must be barricaded with temporary fences to prevent animals from falling into the pits. All excavation along the line must be barricaded and deep excavation signs and topsoil sign must be placed.

### **7.3 Buildings and Structures**

Containers have been established on site by various subcontractors that are being used as offices. Male and female ablution facilities have been provided. Chemical toilets and a conservancy tank are used to manage sewer onsite.

## **8 SOCIAL RESPONSIBILITY**

Any complaints from the public are to be recorded on complaints register maintained by the Contractor whose responsibility it is to track and resolve the complaints/issues that are raised. In addition, a box for receiving internal grievances is present at the main site office facility which allows for project staff to bring to the attention of the project management team any comments and or concerns.

## 9 ENVIRONMENTAL AWARENESS AND TRAINING

The contractor has undertaken Toolbox talks for the month of December 2025 covering the following topics:

- Importance of drip trays toolbox
- Environmental Awareness
- Smoking policy
- Disciplinary Code of Conduct
- Smoking Policy
- Housekeeping on site
- 16 Days of Activism
- Bees on site
- Hazardous Management Plan
- Sewage Management Plan

## 10 HERITAGE

In the event of any unknown artefacts being uncovered during construction, the ESCO and Project Manager must be informed immediately who must then instruct work to be stopped in the immediate area and then promptly report the discovery/finding to the ECO, a heritage specialist and the relevant heritage authority to investigate and confirm if such discovery is in fact a heritage artefact of any significance. No activities impacting upon any heritage sites were reported during this reporting period.

## 11 WARNING & NCRS

No NCR reports were issued by the ECO in the month of December 2025.

## 12 REHABILITATION

No rehabilitation works have commenced during this period; further rehabilitation is expected to occur on the project as and when other works have been completed.

## 13 INCIDENTS AND ACCIDENTS

All environmental related events, incidents and accidents are to be reported directly to the ECO and kept on a central register and included in the monthly report. No environmental incidents that are reportable under Section 30 of the NEMA occurred in December 2025. A register of environmental incidents is attached as **Annexure C**.

## 14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 17<sup>th</sup> of December 2025 with observations documented in this report. Monthly ECO compliance reports are submitted to the Department (DFFE) by the ECO.

## 15 AUDIT METHODOLOGY

This section provides an overview of the methods employed in making observations and providing recommendations and conclusions derived from the audit procedures undertaken.

### 15.1 Audit Process

The site visit, data reviews and report drafting were undertaken by the ECO/auditor. The audit included the following procedures:

- **Site Inspections.** The areas and aspects covered during the inspections with concurrent discussions with the ESCO and site-based representatives of the EA holder included *inter alia*:
  - i. Access control to the sites.
  - ii. Ecologically sensitive areas, where applicable.
  - iii. Waste management.
  - iv. Incident and complaints management.
  - v. Landowner relations.
  - vi. Infrastructure management.
  - vii. Environmental Awareness.
  - viii. Record-keeping and document control.
  - ix. Stormwater and Erosion management
- **Documentation review.** This included:
  - i. A review of the EAs, EMPs and where applicable, method statements.
  - ii. A review of previous audit reports, records, observations, and findings.
  - iii. A review of any remedial and/or protective measures implemented.
  - iv. Identification, if applicable, any gaps requiring action and/or rectification.
- **Audit Report compilation.** This included:
  - i. Recording any observations and findings identified during the audit.
  - ii. Providing recommendations relating to improvement or non-compliance, if and where applicable.



## 15.2 Observation and Recommendation Determination

Observations and subsequent recommendations were based on and are limited to the following:

- i. Available documentation and records viewed or received prior, subsequent, or during the site visit.
- ii. Observations made during the period that the ECO/auditor was on site; and
- iii. Information received from both direct and cross-referenced discussions with permanent site-based staff.

## 15.3 Findings

Any key findings highlighted in this report will indicate areas and/or aspects that require improvement or rectification. The purpose of summarising the findings is to allow the EA holder to identify common management challenges that effect the level of compliance to the conditions of the EAs and EMPrs.

Where findings and recommendations pertaining are deemed significant through compliance status or performance, they are documented as specific issues in the report. All site-specific observations are recorded in the corresponding audit checklist tables.

## 15.4 Audit Tables and Compliance Ratings

The audit table captures observations and recommendations made in relation to the conditions stipulated in the EAs and EMPrs. It provides the reader with more detailed information in terms of what the stipulated requirements are in relation to the organisation's assessed current compliance status, according to the observations recorded by the auditor.

Ratings are calculated based on a scoring system whereby each auditable condition is provided with a score as highlighted in **Table 4** below.

**Table 4:** Compliance rating and scoring.

| Status                              | Compliance Rating |         | Description                                                                                                                                                                                |
|-------------------------------------|-------------------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | Abbreviation      | Scoring |                                                                                                                                                                                            |
| <i>Compliant</i>                    | C                 | 2       | <i>No improvements required</i>                                                                                                                                                            |
| <i>Partially Compliant</i>          | PC                | 1       | <i>Minor improvements required</i>                                                                                                                                                         |
| <i>Non-Compliant</i>                | NC                | 0       | <i>Major improvements required</i>                                                                                                                                                         |
| <i>Work in Progress</i>             | WiP               | -       | <i>Environmental management measures are underway but not yet fully implemented or verified, requiring further monitoring and assessment.</i>                                              |
| <i>Not Applicable / Not Audited</i> | NA                | -       | <i>No improvements required and / or the condition is either not, not yet or no longer relevant at the time of the audit</i>                                                               |
| <i>Informative</i>                  | info              | -       | <i>These relate to informative elements that provide either useful information or are descriptive in the explanation and understanding of statements or concepts in the audit criteria</i> |

Each condition has been ascribed a colour-coded status indicator of Compliant (green), Partially Compliant (orange), major-compliant (red), Not Auditable/Audited (grey), Work in Progress (light red) and Informative (blank/white) to assist the reader in determining aspects that require attention to improve on compliance achieved, if and where applicable. No compliance scoring is attributed any of the audit criteria information pertaining to the following three audit status symbols, namely 'NA', 'WiP', and 'info' as they were either not auditable and/or were not applicable/relevant at the time the audit was undertaken. In other words, they are excluded from the overall compliance rating calculations.

An overall compliance rating is calculated as a percentage to provide the reader with an overview of compliance to the relevant audit criteria however each condition should be considered on its own merits as the ratings do not necessarily portray the severity or impact of the reported finding relating to a condition.

## 16 ASSUMPTIONS AND LIMITATIONS

The ECO compliance audit and associated report are based upon the assumptions that:

- i. Documentation provided to the ECO/auditor is factual and true.
- ii. The audit is based purely on the conditions as stipulated in the EAs and EMPs.
- iii. The construction phase is currently underway and operational phase activities are not applicable.
- iv. Documentation / reports were randomly sampled / reviewed in order to accommodate time constraints.
- v. Where visual observations were not possible either due to physical access constraints or safety constraints, the ECO/auditor used other means to determine compliance, either through requesting written evidence provided by contractors / service providers who service the site or via interviews with technical site-based staff.

## 17 CONSULTATION PROCESS

The approach of consultation followed during the environmental audit was based on written (email) and telephonic correspondence between the ECO/auditor and the Environmental Site Compliance Officer which also includes consultation and communication with the EA holder and competent authority in terms of report submission.

## 18 FINDINGS

Findings are listed in the attached checklists, and it should be noted that findings should be considered individually in the context of the full audit and each condition and associated rating.

The following findings were noted onsite:

- Although alien vegetation clearing is ongoing, there are still area requiring to be cleared.
- There is pile of torn nets laydown area at the laydown area that must be taken for recycling.
- Signs of erosion were observed throughout the construction area.
- Chemical containers are overcrowded in the chemical bund at the laydown area.
- The no-go area on the wetland at tower 13 has not been barricaded
- The access road in a bad condition due to erosion and water ponding
- Some machineries were standing with no drip trays increasing the changes of spills causing soil or water pollution.

Based on the outcomes of the audit it was established that the objectives of the EAs and EMPs were achieved in terms of:

- i. *Sufficiently providing for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis.*
- ii. *Ensuring compliance with the provisions of environmental authorisation and EMPs.*

### 18.1 Minor improvements required.

- Disposing of the torn barricade nets kept at the laydown area.

### 18.2 Major improvements required.

- Clearance of alien vegetation must be done on all affected areas.
- A barricading net must be placed to demarcate the no-go areas at the wetland area.
- Maintaining the damaged access roads.
- Establish another chemical bund to store other chemicals as the one at the lay down area is overcrowded.
- Implement stormwater measures on the entire site.

- Ensuring that drip trays are placed under every standing machine.

## 19 AUDIT SUMMARY

In terms of the findings and results of the **December 2025** ECO audit, the project achieved an overall **99%** compliance rating with the conditions of the EAs and EMPs.

**Table 5:** Compliance Scoring

| No.                                       | Audit criteria                                                                                             | Compliant (C) | Partially Compliant (PC) | Major-non-Compliant (NC) | Work in Progress | Normative (info) | Not Applicable / Not Audited (NA) | Percentage Score      |
|-------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------|--------------------------|--------------------------|------------------|------------------|-----------------------------------|-----------------------|
| 1                                         | Environmental Authorisation for Virginia Solar Park OHPL (DFFE Ref No: 14/12/16/3/3/1/2444)                | 24            | 0                        | 0                        | 1                | 18               | 3                                 | 100%                  |
| 2                                         | Environmental Authorisation for Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2) | 25            | 1                        | 0                        | 1                | 19               | 3                                 | 98%                   |
| 3                                         | EMPr Virginia Solar Park OHPL (DFFE REF NO: 14/12/16/3/3/1/2444)                                           | 216           | 8                        | 0                        | 0                | 46               | 58                                | 98%                   |
| 4                                         | EMPr Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2)                            | 178           | 0                        | 0                        | 0                | 22               | 27                                | 100%                  |
| Overall total no. conditions              |                                                                                                            | 443           | 9                        | 0                        | 2                | 105              | 91                                |                       |
| Audited conditions                        |                                                                                                            | 886           | 9                        | 0                        | -                | -                | -                                 | (Potential max score) |
| Overall Compliance Rating Calculation (%) |                                                                                                            | 99%           |                          |                          |                  |                  |                                   |                       |

## 20 RECOMMENDATIONS

**Based on the findings identified the following is recommended:**

- Barricade the no-go area (wetland) at tower number 13 with a barricade net to demarcate the boundaries of the sensitive sites. Only a no-go sign has been placed.
- Alien vegetation clearance must continue onsite, and the contractor must monitor the cleared areas to prevent reestablishment of alien vegetation.
- Roads must be maintained to correct the effects of erosion and water ponding.
- Stormwater measures must be implemented, measures to be implemented must align with the current conditions onsite.
- Drip trays must be used on all standing equipment including trucks waiting to be onboarded.
- Waste must be removed from the waste area more frequently to prevent overstocking the waste area.
- All torn nets must be removed for disposal.
- Another chemical bund must be provided to prevent overcrowding chemicals.

## 21 CONCLUSION

The contractor must ensure that systems and resources to monitor and manage environmental risks and impacts adequately are in place. Resources and personnel to train employees on the contents of the EMPs must be made to ensure that the project runs effectively and efficiently with minimal impact to the biophysical and socio-economic environment.

In general, the EMPs are effective in their current format in terms of content and relevance and there are no major shortcomings. The EMPs sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with this project.

**PREPARED BY:**

A handwritten signature in black ink, appearing to read 'Sakaunda'.

**Sakaunda Jennipher**

Environmental Control Officer

NCC Operations (Pty) Ltd

**M** -069 510 7630

**E** - [jenniphers@ncc-group.co.za](mailto:jenniphers@ncc-group.co.za)

**REVIEWED BY:**

A handwritten signature in black ink, appearing to read 'Nick Gates'.

**Nick Gates**

Senior Environmental Consultant

NCC Operations (Pty) Ltd

**M** -073 1998 431

**E** - [nickg@ncc-group.co.za](mailto:nickg@ncc-group.co.za)



## ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

### Open Concerns/Complaint

| No | Observation date | Concern/Complaint | Suggested Due Date <sup>1</sup> | Proposed Corrective Action | Status | Closure status |
|----|------------------|-------------------|---------------------------------|----------------------------|--------|----------------|
|    |                  |                   |                                 |                            |        |                |

*\*The concerns register is updated once the ECO is present on site.*

### Closed Concerns

| No | Observation date | Concern/Complaint | Due Date suggested by ECO | Corrective Action Taken | Outcome | Closure status |
|----|------------------|-------------------|---------------------------|-------------------------|---------|----------------|
|    |                  |                   |                           |                         |         |                |
|    |                  |                   |                           |                         |         |                |

## ANNEXURE B - NCR REGISTER

| Ref No. | Originator | Dated Issued | Description | Proposed Corrective Action | Closure Status | Closure Date | Further Action Required |
|---------|------------|--------------|-------------|----------------------------|----------------|--------------|-------------------------|
|         |            |              |             |                            |                |              |                         |

## ANNEXURE C - INCIDENT REGISTER

| Date       | Type                                                                                           | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                     | Volume                            | Remedial Action                                              |                                                                                |
|------------|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|--------------------------------------------------------------|--------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna &Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                  |                                   | Immediate<br>Corrective Actions                              | Preventative measures                                                          |
| 20/03/2025 | Waste water                                                                                    | Soil pollution                                                                               | On 20, 2025, at approximately 8:28, the conservative tank being used to collect wastewater from conservancy tank had overfilled, and a Spillage had occurred spillage of approximately 8-10 litres of wastewater mixed with the cleaning material. the toilet supplier attended to the spill immediate & initiated spill Clean-up. Contaminated soil was taken to the hazardous waste skip. | 10 l (below Section 30 threshold) | Clean- up must be done as soon as the spills are identified. | The conservancy tank must be emptied more frequently to reduce overfilling.    |
| 19/03/2025 | Waste water                                                                                    | Soil pollution                                                                               | Approximately 12 litres of wastewater mixed with the cleaning chemicals where toilets are located. The toilet had been leaking since the previous day, and wastewater was contained in a drip tray. The toilet supplier was notified, and he came to service The toilets; however, during servicing; the drip tray spilled over causing the spillage of the wastewater onto the ground.     | 12l (below Section 30 threshold)  | Clean- up must be done as soon as the spills are identified. | Leaking toilets must not be allowed onsite.                                    |
| 08/03/2025 | Diesel spillage                                                                                | Soil pollution                                                                               | On 08 March 2025 at 05:30, security supervisor discovered a diesel leakage during the morning patrol. The spillage occurred due to the diesel injectors that were loose one of them was not properly fitted and diesel pressure removed them while the bakkie was in motion.                                                                                                                | 20l (below Section 30 threshold)  | Clean- up must be done as soon as the spills are identified  | Vehicles must be maintained regular. only road worthy vehicles must be onsite. |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                 | Volume                                   | Remedial Action                                             |                                                                                |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                              |                                          | Immediate<br>Corrective Actions                             | Preventative measures                                                          |
| 07/03/2025 | Water and antifreeze                                                                            | Soil pollution                                                                               | The Driver parked the minibus on site, shortly a leak observed containing a mixture of water and antifreeze, while also exhibiting signs of overheating.                                                                                                                                                                                                                | -                                        | Clean- up must be done as soon as the spills are identified | Vehicles must be maintained regular. only road worthy vehicles must be onsite. |
| 06/05/2025 | Water mixed with antifreeze spillage                                                            | Soil pollution                                                                               | On 6 May 2025 at 14:00, the TLB Operator was busy moving spoil material near the access road to the allocated spoil Stockpile area, when the TLB, radiator fan belt snapped & the container that stores water & antifreeze busted. Approximately 5 Liters of water with antifreeze spilled                                                                              | 5 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.                  |
| 08/05/2025 | Toilet Cleaner mixed with water spillage                                                        | Soil pollution                                                                               | A chemical toilet in PV3 at the laydown area at around 3:53 pm, 08 May 2025 was reported to be leaking, when the toilet was assessed, it was identified that there was a broken pipe that leaked the chemical water. An immediate action was taken to clean up the spillage. The contaminated soil was collected into the bags and taken to site waste management area. | 6 litres (below Section 30 threshold)    | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent.         |
| 12/05/2025 | Diesel spillage                                                                                 | Soil pollution                                                                               | On 12-05-2025 at 06:40, the ambulance was on the way to the access control point along the main access road, when it had a sudden breakdown and diesel was spilled along the access road, leaving a trail of diesel spill for approximately +-400 Metres. Approximately +-2 Litres of diesel was spilled                                                                | 2 litres (below Section 30 threshold)    | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.                  |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Volume                                          | Remedial Action                                              |                                                                                      |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                 | Immediate<br>Corrective Actions                              | Preventative measures                                                                |
| 15/05/2025 | Hydraulic oil spillage                                                                          | Soil pollution                                                                               | On the 15/05/2025, a side tipper truck was transporting spoil material when the cylinder failed and spilled ~7 litres of hydraulic oil, about 455m from the nearest watercourse. The contaminated soil was promptly cleaned up.                                                                                                                                                                                                                                                                                                                  | 7 litres ( <i>below Section 30 threshold</i> )  | Clean- up must be done as soon as the spills are identified  | All Vehicles must be serviced regularly to reduce breakdowns.                        |
| 20/05/2025 | Toilet Cleaner mixed with water spillage                                                        | soil pollution                                                                               | It was around 11:30 am when it was reported that there was a spillage, that when the Fidamo team was about to clean the toilets at Pv1 Laydown area, a pipe from the generator busted and the water leaked from the broken pipe. The water that spilled was approximately 3-4 Liters and the pipe was immediately stopped. The chemical that was in the water is blue splash Toilet chemical. An immediate action was taken to clean up the spillage. The contaminated soil was collected into the bags and taken to site waste management area. | 4 litres ( <i>below Section 30 threshold</i> )  | Clean- up must be done as soon as the spills are identified  | The maintenance/servicing of the toilets is to be made more stringent.               |
| 21/05/2025 | Fauna                                                                                           | Loss of biodiversity                                                                         | On the 21/05/2025 a snake was fatally wounded during the internal road construction works.                                                                                                                                                                                                                                                                                                                                                                                                                                                       | N/A                                             | The dead animal was buried.                                  | N/A                                                                                  |
| 26/05/2025 | Hydraulic oil spillage                                                                          | Soil pollution                                                                               | On 26/05/2025, at around 16:50 a drill rig operator noticed a leak from the machine, he immediately reported the leak to the supervisor. The supervisor called the mechanic but did not report the spillage. The oil further spilled to the soil during the repair attempts which were done under poor lighting. The                                                                                                                                                                                                                             | 25 litres ( <i>below Section 30 threshold</i> ) | Clean- up must be done as soon as the spills are identified. | The ESCO issued NCR to the subcontractor for failing to report spillage immediately. |

| Date       | Type                                                                                           | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                              | Volume                                                                       | Remedial Action                                                                                            |                                                                                                               |
|------------|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna &Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                              | Immediate<br>Corrective Actions                                                                            | Preventative measures                                                                                         |
|            |                                                                                                |                                                                                              | spillage was left overnight and was only reported to the EO the next morning when the shift began.                                                                                                                                                                                                                                                                                                                                                   |                                                                              |                                                                                                            |                                                                                                               |
| 11/06/2025 | Concrete and oil<br>Spillage                                                                   | Soil pollution                                                                               | On the 11 <sup>th</sup> of June 2025 the concrete mixer truck overturned resulting in the spillage of an estimated 3m3 (3 cubic meters) of concrete and approximately 8litres of diesel. The contractor removed the spilled concrete and dumped it on the natural area adjacent to the road                                                                                                                                                          | 8 litres of diesel and 3m3 of concrete ( <i>below Section 30 threshold</i> ) | Clean- up must be done as soon as possible and an investigation must be done on the cause of the accident. | The ESCO issued an NCR to the subcontractor for failing to report dumping concrete on the natural vegetation. |
| 16/06/2025 | Toilet Cleaner<br>mixed with water<br>spillage                                                 | Soil pollution                                                                               | At 08:32am, on the 16th of June 2025, The Client (Robin) reported that ABLON's Ablution facilities were leaking which resulted to soil contamination, we immediately stopped everyone from using the Toilet and reported the issue to our service provider. A drip tray was placed immediately underneath the toilet. The event occurred at the OHPL Site Camp and the name of the chemical that spilled on the ground is Portabloo Toilet Chemical. | 30 litres ( <i>below Section 30 threshold</i> )                              | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin.        | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced.              |
| 24/06/2025 | Toilet Cleaner<br>mixed with water<br>spillage                                                 | Soil pollution                                                                               | At around 8 am on the 24/06/2025 a spillage was reported by the contractor. Approximately 30 litres of Toilet Blue was spilled at the Virginia 1 laydown area. The spillage was cleaned up and the contaminated soil removed for disposal.                                                                                                                                                                                                           | 30 litres ( <i>below Section 30 threshold</i> )                              | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin.        | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced.              |

| Date       | Type                                                                             |     | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Volume                                 | Remedial Action                                                                                                                                    |                                                                    |
|------------|----------------------------------------------------------------------------------|-----|----------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other |     | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                        | Immediate Corrective Actions                                                                                                                       | Preventative measures                                              |
| 08/07/2025 | Hydraulic Spillage                                                               | Oil | Soil pollution                                                             | A tipper truck spilled some hydraulic oil when the driver was offloading some excavated material at PV2 I8 road on the 08h of July 2025. The driver lifted the truck to off load the material when it was halve way up, he discovered that the body of the truck was swinging to the sides and he tried to stop, and discovered some oil leaks from the hydraulic cylinder, about +- 9 litres of oil spilled to the ground and it was reported to the EO, immediately the supervisor and the driver cleaned the spillage and the contaminated soil was collected into bags and taken to ABC Solar Waste management area. | 30 litres (below Section 30 threshold) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin.                                                | Vehicles that are constantly breaking down must be moved off site. |
| 08/07/2025 | Hydraulic Spillage                                                               | Oil | Soil pollution, Loss of vegetation                                         | A tipper truck spilled some hydraulic oil when the driver was offloading some excavated material at PV2 I8 road on the 08h of July 2025. The driver lifted the truck to off load the material when it was halve way up, he discovered that the body of the truck was swinging to the sides and he tried to stop, and discovered some oil leaks from the hydraulic cylinder, about +- 9 litres of oil spilled to the ground and it was reported to the EO, immediately the supervisor and the driver cleaned the spillage and the contaminated soil was collected into bags and taken to ABC Solar Waste management area. | +/- 9L (below Section 30 threshold)    | The spillages were cleaned, and the contaminated soil was removed and stored in bags and taken to waste management area at ABC solar laydown area. |                                                                    |

| Date       | Type                                                                                           | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                          | Volume                                | Remedial Action                                                                                                                                |                                                                                                  |
|------------|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna &Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                       |                                       | Immediate<br>Corrective Actions                                                                                                                | Preventative measures                                                                            |
| 13/08/2025 | Sewage spillage                                                                                | Soil pollution,<br>Loss of<br>vegetation                                                     | A pipe from the pump got broken when the driver was reversing and it started to spill approximately 4 litres of sewage water, at PV2 block 15 at 2:18 pm and immediately after noticing the spills, he immediately stopped the car. He immediately cleaned and it was reported to the EO. Proper cleaning was further done by Fidamo's (toilet supplier) team members.                                                                           | +/- 4L (below Section 30 threshold)   | The spillages were cleaned, and the contaminated soil was removed and stored in bags and taken to waste management centre in Virginia 3.       |                                                                                                  |
| 15/08/2025 | Toilet chemical spillage                                                                       | Soil pollution                                                                               | Toilet chemical spill at Tower 29. The Toilet Pump burst, and the chemical spilled into the ground contaminating the soil. The Environmental Officer immediately attended to the spill. A drip tray was placed immediately under the Toilet to contain the spillage. The volume of the chemical spill is approximately 4.5liters A spade is used to remove the contaminated soil. The contaminated soil was placed inside a hazardous waste bin. | +/- 4.5L (below Section 30 threshold) | The spillages were cleaned, and the contaminated soil was removed and stored in bags and taken to waste management area at Ablon laydown area. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 26/08/2025 | Engine oil spillage                                                                            | Soil pollution                                                                               | A tractor towing a trailer filled with poles experienced an engine malfunction, resulting in the leakage of at least 7 litres of engine oil on the main access road near the MV trenches.                                                                                                                                                                                                                                                        | +/- 7L (below Section 30 threshold)   | Absorbent material was used to absorb the engine oil from the compacted gravel road and later taken for disposal as hazardous waste.           | Vehicles that are constantly breaking down must be moved off site                                |

| Date       | Type                                                                                           | Impact                                                                                    | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Volume  | Remedial Action                                                                                            |                                                                                                  |
|------------|------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna &Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/ Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |         | Immediate<br>Corrective Actions                                                                            | Preventative measures                                                                            |
| 09/09/2025 | Toilet chemical spillage                                                                       | Soil pollution                                                                            | A chemical toilet in PV1 block 1 around 9:00 am, 09 September 2025 was reported to be leaking, when the toilet was assessed, it was overfull that resulted in overflowing. An immediate action was taken to clean up the spillage, however during the cleaning process the weather changed we experienced some lightning, and they had to stop. It was about 8-10 litres of chemical water that spilled. Then after lunch the weather was conducive to proceed with work, and they properly cleaned the spillage, and the contaminated soil was collected into | +/- 9L  | The spillage was cleaned, and the contaminated soil was removed and stored in bags, taken to ABC lay down. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 12/09/2025 | Toilet chemical spillage                                                                       | Soil pollution                                                                            | At 10:58 while on the way to use the toilet Wanga witnessed that the toilet is leaking & reported immediately to the HDEC EO.                                                                                                                                                                                                                                                                                                                                                                                                                                  | +/- 10L | Drip trays placed to contain the leakage. Absorbent was spread on the area where spill occurred.           | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 01/10/2025 | Toilet chemical spillage                                                                       | Soil pollution                                                                            | Approximately 8 litres of water and toilet blue mixture was spilled, a drip tray was placed under the toilet however not at the leaking points.                                                                                                                                                                                                                                                                                                                                                                                                                | +/- 8L  | The spillage was cleaned, and the contaminated soil was removed and stored in bags, taken to WMC.          | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |



| Date       | Type                                                                                           | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                 | Volume                              | Remedial Action                                                         |                                                                                                                     |
|------------|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|-------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna &Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                              |                                     | Immediate<br>Corrective Actions                                         | Preventative measures                                                                                               |
| 02/10/2025 | Toilet chemical spillage                                                                       | Soil pollution                                                                               | A pipe from the pump inside the mobile toilet broke and started leaking, which caused a spillage that was discovered by EO. Approximately 10 litres of toilet blue chemical spilled. Upon discovery the service provider was notified and attended to the spillage.                                                                                                                                                     | +/-10L                              | The spillage was cleaned, and the contaminated soil was removed to WMC. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced.                    |
| 03/10/2025 | Hydraulic oil spillage                                                                         | Soil pollution                                                                               | A hydraulic oil pipe on a front-end loader burst, resulting in a spill of nearly 10 litres of hydraulic oil. The operator stopped the equipment, informed the supervisor and put a drip tray beneath the machine. A cleanup was conducted around the machinery while waiting for a mechanic to arrive. Once on site, the mechanic repaired the pipe and then moved the machine to clean the area underneath the loader. | +/-10L (below Section 30 threshold) | The spillage was cleaned, and the contaminated soil was removed to WMC. | Vehicles that are constantly breaking down must be moved off site                                                   |
| 13/11/2025 | Deferential oil spillage                                                                       | Soil pollution                                                                               | The grader got stuck in the mud at PV3 in block 24 around 09:10 am. When the operator reversed, he heard a sound, and he stopped to check, and he found out that the back right side wheel shaft was broken and the wheel was leaning on the side of the grader. The TLB and front-end loader were used to push grader out of the mud. While doing so about 14-15 litres of transmission oil spilled on the ground.     | +/-15L(below Section 30 threshold)  | The spillage was cleaned, and the contaminated soil was removed to WMC. | The cause of the spillage must be investigated<br>Vehicles that are constantly breaking down must be moved off site |

| Date       | Type                                                                                           | Impact                                                                                       | Description of Incident                                                                  | Volume                                 | Remedial Action                                                                     |                                         |
|------------|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|----------------------------------------|-------------------------------------------------------------------------------------|-----------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna &Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                               |                                        | Immediate<br>Corrective Actions                                                     | Preventative measures                   |
| 17/11/2025 | Hydraulic oil<br>spillage                                                                      | Soil pollution                                                                               | A hydraulic pump of a drilling machine broke its shaft; the machine started to drip oil. | +/-20L (below Section 30<br>threshold) | The spillage was<br>cleaned, and the<br>contaminated soil<br>was removed to<br>WMC. | Drip tray must be used all the<br>time. |

## **ANNEXURE D – PHOTOGRAPHS**



**Figure 1:** Water ponding at the substation area.



**Figure 2:** Large quantities of wood pats at the waste area



**Figure 3:** Rainwater accumulated at Tower No. 13



**Figure 4:** Overflowing sump at the waste area.





**Figure 5:** Trucks standing without drip trays.



**Figure 6:** Alien vegetation that must be cleared.



**Figure 7:** Torn barricading nets must be taken for recycling.



**Figure 8:** Crowded chemical bund

**THIS PAGE WAS INTENTIONALLY LEFT BLANK**





---

# ECO MONTHLY ENVIRONMENTAL MONITORING REPORT

Virginia Photo Voltaic (PV) Solar Facility 1, 2 and 3,  
Matjhabeng, Lejweleputswa District Municipality within  
the jurisdiction of the Free State Province.

---

**PREPARED FOR:**

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

Department of Forestry, Fisheries, and the Environment: Compliance Monitoring

**DATED:**

December 2025

**PREPARED BY:**

NCC Operations

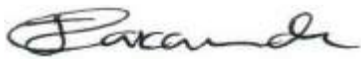
**T** • 021 702 2884

**E** • [info@ncc-group.co.za](mailto:info@ncc-group.co.za)

## DECLARATION OF INDEPENDENCE

I, Jennipher Sakaunda, as duly authorised representative of NCC Operations (Pty) Ltd ("**NCC**"), hereby confirm my independence (as well as that of NCC) as an auditor and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which URSA Energy (Pty) Ltd has appointed NCC as Environmental Control Officer ("**ECO**"), other than fair remuneration for work performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'J Sakaunda', is positioned below the 'Signed:' text.

**Jennipher Sakaunda**

15 January 2026

Environmental Control Officer

NCC Operations (Pty) Ltd

## **LIABILITY DISCLAIMER AND CONFIDENTIALITY CLAUSE**

All inspections conducted, as well as reports and recommendations provided by NCC are purely advisory. They are primarily intended for the purpose of assisting clients in loss control, risk management as well as health, safety, and environmental procedures.

Observations and recommendations are the result of practices and conditions observed, and information made available to us in various forms at the time of our visit. They do not purport to refer to or guarantee compliance with local or government regulations which may be applicable to such practices and conditions. This report should not be considered a definitive listing of all existing risks nor an absolute solution to all indicated risks, or hazards present from time to time in the Client Organisation. The report should always be considered in its entirety; individual sentences, paragraphs or sections of the report should not be used in isolation.

This report should not be reproduced except in its entirety, including this liability disclaimer or contents reproduced or disclosed to any third party without the prior written approval of NCC.

NCC assumes no responsibility for any losses incurred as a result of the implementation, management, and operation of recommended health, safety and environmental systems, processes and procedures.

## DOCUMENT CONTROL

|                     |                                             |
|---------------------|---------------------------------------------|
| <b>REPORT TITLE</b> | Monthly ECO Environmental Monitoring Report |
| <b>PROJECT</b>      | Virginia Solar PV 1, 2, 3                   |
| <b>LOCATION</b>     | Free State Province                         |
| <b>EA HOLDER</b>    | URSA Energy (Pty) Ltd                       |
| <b>ECO</b>          | NCC Operations (Pty) Ltd                    |
| <b>REVISION</b>     | 00                                          |
| <b>DATE</b>         | 15/01/2026                                  |

| Revision | Date       | Description                  |
|----------|------------|------------------------------|
| Rev 00   | 15/01/2026 | First Draft - Internal       |
| Rev 01   | TBC        | Final - Authority submission |

## REPORT DISTRIBUTION LIST

| Name                   | Organisation                      | Issued     | Format     |
|------------------------|-----------------------------------|------------|------------|
| Janine Brasington      | Red Rocket South Africa (Pty) Ltd | 15/01/2026 | Electronic |
| Tarryn Frankland       | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Maggie Logan           | Red Rocket South Africa (Pty) Ltd |            | Electronic |
| Director of Compliance | DFFE                              | TBC        | Electronic |

## TABLE OF CONTENTS

|                                                     |           |
|-----------------------------------------------------|-----------|
| <b>TABLE OF FIGURES .....</b>                       | <b>7</b>  |
| <b>ABBREVIATIONS .....</b>                          | <b>8</b>  |
| <b>1 INTRODUCTION .....</b>                         | <b>9</b>  |
| 1.1 Background.....                                 | 9         |
| 1.2 Audit Scope and Purpose.....                    | 11        |
| 1.3 Monitoring Frequency and Reporting.....         | 11        |
| <b>2 AUDITOR BACKGROUND .....</b>                   | <b>12</b> |
| <b>3 GENERAL (NOTABLE EVENTS) .....</b>             | <b>13</b> |
| 3.1 General Outstanding matters.....                | 13        |
| 3.2 Audits (Internal and External).....             | 13        |
| <b>4 WASTE MANAGEMENT .....</b>                     | <b>14</b> |
| 4.1 Domestic/ General Waste.....                    | 14        |
| 4.2 Hazardous waste.....                            | 14        |
| 4.3 Wastewater .....                                | 15        |
| <b>5 PROTECTIVE MEASURES .....</b>                  | <b>16</b> |
| 5.1 General .....                                   | 16        |
| <b>6 ENVIRONMENTAL CONSERVATION .....</b>           | <b>17</b> |
| 6.1 Conservation of Flora and Fauna .....           | 17        |
| 6.2 Water Management.....                           | 17        |
| 6.3 Soil Management .....                           | 17        |
| 6.4 Stormwater and Erosion onsite .....             | 17        |
| <b>7 INFRASTRUCTURE MANAGEMENT .....</b>            | <b>18</b> |
| 7.1 Access Roads.....                               | 18        |
| 7.2 Fences, Gates, and Barricading .....            | 18        |
| 7.3 Buildings and Structures .....                  | 18        |
| <b>8 SOCIAL RESPONSIBILITY .....</b>                | <b>18</b> |
| <b>9 ENVIRONMENTAL AWARENESS AND TRAINING .....</b> | <b>19</b> |
| <b>10 HERITAGE .....</b>                            | <b>19</b> |
| <b>11 WARNING &amp; NCRS .....</b>                  | <b>19</b> |

|           |                                                        |           |
|-----------|--------------------------------------------------------|-----------|
| <b>12</b> | <b>REHABILITATION .....</b>                            | <b>20</b> |
| <b>13</b> | <b>INCIDENTS AND ACCIDENTS .....</b>                   | <b>20</b> |
| <b>14</b> | <b>MEETINGS AND OTHER CORRESPONDANCE.....</b>          | <b>20</b> |
| <b>15</b> | <b>AUDIT METHODOLOGY.....</b>                          | <b>21</b> |
| 15.1      | Audit Process.....                                     | 21        |
| 15.2      | Observation and Recommendation Determination.....      | 22        |
| 15.3      | Findings.....                                          | 22        |
| 15.4      | Audit Tables and Compliance Ratings .....              | 22        |
| <b>16</b> | <b>ASSUMPTIONS AND LIMITATIONS .....</b>               | <b>24</b> |
| <b>17</b> | <b>CONSULTATION PROCESS.....</b>                       | <b>24</b> |
| <b>18</b> | <b>FINDINGS .....</b>                                  | <b>25</b> |
| 18.1      | Minor improvements required. ....                      | 25        |
| 18.2      | Major improvements required.....                       | 25        |
| <b>19</b> | <b>AUDIT SUMMARY.....</b>                              | <b>26</b> |
| <b>20</b> | <b>RECOMMENDATIONS .....</b>                           | <b>27</b> |
| <b>21</b> | <b>CONCLUSION.....</b>                                 | <b>27</b> |
|           | <b>ANNEXURE A – CONCERNS/COMPLAINTS REGISTER .....</b> | <b>29</b> |
|           | <b>ANNEXURE B - NCR REGISTER .....</b>                 | <b>29</b> |
|           | <b>ANNEXURE C - INCIDENT REGISTER.....</b>             | <b>30</b> |
|           | <b>ANNEXURE D – PHOTOGRAPHS .....</b>                  | <b>41</b> |

## TABLE OF FIGURES

|                                                                                             |    |
|---------------------------------------------------------------------------------------------|----|
| Figure 1: Condition of some portions of the access roads. ....                              | 42 |
| Figure 2: Alien Vegetation on stockpiles.....                                               | 42 |
| Figure 3: Poor waste management practices. ....                                             | 43 |
| Figure 4: Overflowing sump at the waste area.....                                           | 43 |
| Figure 5: Constructed stormwater berms.....                                                 | 44 |
| Figure 6: Machinery standing with no drip trays.....                                        | 44 |
| Figure 7: Damage to the road caused rainwater.....                                          | 45 |
| Figure 8: Rainwater that accumulated in the drip that must disposed as hazardous waste..... | 45 |
| Figure 9: Stockpile height exceeding 2m.....                                                | 46 |

## ABBREVIATIONS

|             |                                                         |
|-------------|---------------------------------------------------------|
| <b>BAR</b>  | Basic Assessment Report                                 |
| <b>CA</b>   | Competent Authority                                     |
| <b>DEA</b>  | Department of Environmental Affairs (now DFFE)          |
| <b>DFFE</b> | Department of Forestry, Fisheries, and the Environment  |
| <b>DWS</b>  | Department of Water and Sanitation                      |
| <b>EA</b>   | Environmental Authorisation                             |
| <b>EAP</b>  | Environmental Assessment Practitioner                   |
| <b>ECO</b>  | Environmental Control Officer                           |
| <b>EIA</b>  | Environmental Impact Assessment                         |
| <b>EMPr</b> | Environmental Management Programme                      |
| <b>EO</b>   | Environmental Officer (Contractor)                      |
| <b>ER</b>   | Employer's Representative                               |
| <b>ESCO</b> | Environmental Site Compliance Officer                   |
| <b>kV</b>   | Kilovolt                                                |
| <b>MVA</b>  | Megavolt Amperes                                        |
| <b>MW</b>   | Megawatt                                                |
| <b>NCC</b>  | NCC Operations                                          |
| <b>NCR</b>  | Non-Compliance Report                                   |
| <b>NEMA</b> | National Environmental Management Act (No. 107 of 1998) |
| <b>NWA</b>  | National Water Act (No. 36 of 1998)                     |
| <b>OHPL</b> | Overhead Power Line                                     |
| <b>SDC</b>  | Safe Disposal Certificate                               |
| <b>SHE</b>  | Safety, Health, and Environment                         |
| <b>SS</b>   | Substation                                              |
| <b>TBC</b>  | To Be Confirmed                                         |



# 1 INTRODUCTION

## 1.1 Background

NCC Operations (Pty) Ltd ("**NCC**") was appointed by URSA Energy (Pty) LTD ("**URSA**") to provide a suitably experienced independent Environmental Control Officer ("**ECO**") for the construction phase of Virginia Solar Park which will be connected to the Eskom Theseus Main Transmission Substation ("**MTS**"). The site is located on Farm Blomskraal 216, Ventersburg RD located within the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province. On completion the facility will consist of the Photovoltaic (PV) Power Plant with a maximum generation capacity up to 100 MW, a 132kV powerline connecting the substation to the Eskom Theseus substation which is located 16.2 km North-East of the north-western corner of project site.

The ECO has the responsibility of ensuring the mitigation/ rehabilitation measures and conditions referred to in the Environmental Authorisation ("**EA**") are implemented, as well as ensuring compliance with the requirements of the Environmental Management Programme ("**EMPr**"). This report provides an insight into the overall compliance performance and a summary of other environmental concerns and potential environmental risks through observations during site inspections.

This report is based on the following environmental conditions or requirements:

- a) Environmental Authorisations
  - 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
  - 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
  - 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)
- b) Environmental Management Programmes
- c) Relevant environmental legislation.
- d) All other environmental permits, licenses, and authorisations.

The notification of commencement of construction was submitted to the DFFE for Virginia Solar Plant (Pty) Ltd on the 02 May 2024.

This report addresses conditions set out in the EA which states the ECO as part of their duties: "*The ECO must keep record of all activities on site, problems identified, transgressions noted, and a task schedule of tasks undertaken by the ECO.*" As per the roles and responsibilities in the Virginia Solar Project ("**VSP**") EMPr, the primary role of the ECO will be to monitor the construction activities and ensure that the mitigation measures

of the EMPr and Environmental Authorisations (EA) are implemented. This report also includes an audit checklist for the VSP EA as follows:

- 1) Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)
- 2) Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)
- 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)

A summary of the various environmental requirements i.e. the audit criteria relating to the overall project is provided in **Table 1**.

**Table 1:** Summary of environmental requirements / criteria relating to the overall project.

| Components of overall project | Environmental requirements / criteria |               |                                |              |
|-------------------------------|---------------------------------------|---------------|--------------------------------|--------------|
|                               | DFFE EA Ref No.                       | Issue date    | Approved EMPr<br>(Compiled by) | Date         |
| Virginia 1 Solar Park         | 14/12/16/3/3/2/2099/1                 | 20 April 2022 | Terramanzi Group (Pty) Ltd     | October 2023 |
| Virginia 2 Solar Park         | 14/12/16/3/3/2/2100                   | 20 May 2022   | Terramanzi Group (Pty) Ltd     | October 2023 |
| Virginia 3 Solar Park         | 14/12/16/3/3/2/2101                   | 20 April 2022 | Terramanzi Group (Pty) Ltd     | October 2023 |

This report represents the monitoring for the Construction Phase. The responsibility of enforcement of the conditions of the EAs and EMPrs lies with the Project and Project Manager, while the Department of Forestry, Fisheries, and the Environment (“DFFE”) Environmental Management Inspectorate (“EMI”) may also enforce existing and potentially new conditions through compliance notices.

An Environmental Site Compliance Officer (“ESCO”) has been appointed by the holder of the EA to monitor the project compliance onsite on a full-time basis on behalf of the EA holder. The responsibilities of the ESCO includes:

- Monitoring conditions of the Basic Assessment Reports (“BARs”), Environmental Impact Report (EIR) EAs and the EMPrs.
- Ensuring compliance with all relevant environmental legislation.

- Approving method statements (reviewed by the ECO and co-approved by Site Manager).
- Remaining employed until the completion of the construction activities.
- Reporting to the Project Manager, including all findings identified onsite.
- Reporting any significant findings to the ECO.
- Preparing and submitting monthly reports to the ECO and Project Manager.
- Monitoring compliance by the Contractor.

In addition, the ESCO will:

- Undertake daily inspections of the site and surrounding areas.
- Audit compliance with the EMPr and conditions of the environmental authorisation.
- Take appropriate action if the specifications contained in the EMPr and conditions of the environmental authorisation are not followed.
- Monitor and verify that environmental impacts are kept to a minimum, as far as possible; and
- Ensure that activities onsite comply with all relevant environmental legislation.

## 1.2 Audit Scope and Purpose.

In accordance with Regulation 34 of the 2014 NEMA EIA Regulations (as amended) the holder of an environmental authorisation must, for the period during which the EA and EMPr, and where applicable the closure plan, remain valid —

- Ensure that the compliance with the conditions of the EA and the EMPr, and where applicable the closure plan, is audited; and*
- Submit an environmental audit report to the relevant competent authority.*

The purpose of this environmental audit is to verify compliance to the overarching environmental requirements specified as conditions of the EAs and EMPrs, and report on the extent to which the objectives of the EMPrs and are being achieved.

## 1.3 Monitoring Frequency and Reporting.

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 17<sup>th</sup> of December 2025 after which this report was compiled which serves to document and audit. This report covers the monthly reporting for the month of December 2025.

## 2 AUDITOR BACKGROUND

NCC is a multi-disciplinary environmental consulting company based in South Africa which adopts a 'values driven' approach with a common purpose to conserve and create sustainable environments that enable people, planet and business to thrive. We are a trusted partner to major engineering and construction firms, mines, parastatals, film, sports and event production companies, municipalities, provincial and national government, and conservation organisations. Drawing on our years of experience on a wide range of projects, NCC works with our clients to develop, implement, and monitor customised services that add real value.

The auditor, **Jennipher Sakaunda**, is a senior environmental manager with more than 14 years' experience currently employed with NCC. Jennipher Sakaunda has experience in several environmental fields including environmental compliance monitoring and auditing, due diligence assessment, environmental impact and risk assessment, and compilation of environmental management plans/programmes.

**Table 2:** Details of the auditor.

|                       |                                                                                                                                                                                                |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Company</b>        | NCC Operations (Pty) Ltd                                                                                                                                                                       |
| <b>Auditor</b>        | Jennipher Sakaunda                                                                                                                                                                             |
| <b>Tel</b>            | +27 21 702 2884                                                                                                                                                                                |
| <b>Mobile</b>         | +27 69 510 7630                                                                                                                                                                                |
| <b>Email</b>          | <a href="mailto:jenniphers@ncc-group.co.za">jenniphers@ncc-group.co.za</a>                                                                                                                     |
| <b>Address</b>        | 26 Bell Close, Westlake Business Park Westlake, 7945                                                                                                                                           |
| <b>Affiliation</b>    | International Association of Impact Assessment South Africa.<br>Environmental Assessment Practitioner Association of South Africa.<br>South African Council of Natural Scientific Professions. |
| <b>Qualifications</b> | BSc (honors) Environmental Management                                                                                                                                                          |
| <b>Expertise</b>      | A detailed CV can be provided on request.                                                                                                                                                      |

### 3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (December 2025) included the following:

- Clearing and grubbing of Photo Voltaic (PV) areas and levelling works.
- Drilling and pile and torque tubes installations,
- Construction of internal roads and the permanent stormwater berm.
- Trench excavation works for low and medium voltage cables and installation of solar panels, and cable installation.
- Drilling, pile and torque tubes installations at Virginia 3.

#### 3.1 General Outstanding matters

Any major outstanding matters are to be recorded and summarised in the Concerns Register (**Annexure A**). The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

#### 3.2 Audits (Internal and External)

Internal audits are undertaken monthly by the Red Rocket ESCO. This ECO Audit was undertaken on the 17<sup>th</sup> of December 2025. Audit tables/checklists are attached to this report. The ECO undertakes external monthly audits.

## 4 WASTE MANAGEMENT

The contractor must make provision for waste avoidance, minimisation, and separation of waste where possible through recycling efforts. Waste management awareness must be done on an ongoing basis and must be provided through toolbox talks and awareness posters. A waste station was constructed at V3 where waste is temporarily stored, sorted and recycled. The waste station includes a bund where waste will be stored and various compartments where waste will be sorted into. The contractor must ensure that the waste area has a roof as rainwater has filled the sump resulting in dirty water overflowing onto the ground. Recyclables are transported to Mpact for recycling. Large quantities of wood pallets and plastic straps were observed onsite. Waste must be removed from site more frequently to ensure adequate storage space.

### 4.1 Domestic/ General Waste

A total of **4 465 kg** of general waste was generated on site in the month of December 2025; **2 115 kg** constituting boxes and wooden pallets were recycled. A total of **2 350 kg** of waste was disposed at the Matjhabeng Local Municipality waste disposal site. Waste bins are placed in areas where each team will be working, at the end of the day waste is collected and placed at the laydown areas for temporary storage. Designated waste areas have been provided at the contractors' main site offices/laydown areas for purposes of temporary storage of waste prior to collection and transferal to the licensed waste facilities. Bins at the laydown area are colour coded for each waste type. The contractor has commenced with taking waste for recycling.

The service providers dispose the general waste at Matjhabeng Local Municipality waste disposal site-Licence number: B33/2/340/21/P8 16/2/7/C404/D2/Z1/P367. Proof of disposal is available on request.

### 4.2 Hazardous waste

Hazardous waste skips are available at the dedicated waste storage area at each of the sub-contractors' site offices/lay down areas. The contractor disposed **6 520 kg** of hazardous waste in December 2025. Hazardous waste in form of oil spillages, cement spillages and contaminated soil is kept onsite until there is enough to dispose. . No major spillages have been recorded on site. All standing equipment and trucks must be equipped with drip trays to prevent spillages.

### 4.3 Wastewater

Approximately **48 633 L** of sewerage waste was generated on site in the month of December 2025. Chemical toilets and a conservancy tank have been provided onsite. Fewer incidents of spillages from the chemical toilets have been recorded this month an improvement from the previous months. The contractor must ensure these chemical toilets are serviced regularly and drip trays are placed under each toilet.

The General Authorisation that was issued by DWS for the includes the use of a conservancy tank up to a capacity of 50 000 L. The conservancy tank onsite has a capacity of 12 500 L which is below the stipulated GA threshold. The contractor must ensure that this capacity is not exceeded.

The Appointed Service Provider removes sewage and disposes of it at Matjhabeng Local Municipality wastewater treatment facility - Licence No: 10/D4/J/G/2082. Proof of disposal is available onsite. The contractor must ensure the appointed service provider is licenced to provide sewer removal services. With the work being spread out the contractor must ensure ablutions are within walking distance within the areas where people are working.

## 5 PROTECTIVE MEASURES

### 5.1 General

Protective measures have been deployed to mitigate environmental impacts or prevent impacts from occurring which includes:

- Security guards are present on the site, with access control in place.
- Induction training is conducted for all persons working and visiting the site.
- Snake gaiters are provided.
- Spill kits are available on site.
- No-go areas are demarcated and provided with signage.
- Access cards are used to enter and exit the site.
- Rapid alcohol detecting is in place.



## 6 ENVIRONMENTAL CONSERVATION

### 6.1 Conservation of Flora and Fauna

A permit to clear the site and relocate species of concern was received from the Free state Department of Economic, Small Business Development, Tourism and Environmental Affairs. The permit with Ref No. 202306000012649 was issued on 08/06/2023 to pluck protected and unprotected flora.

Clearance of alien vegetation is in progress, however the pace at which the contractor is removing alien vegetation is concerning especially during the rainy season. Additionally, cleared vegetation is not being removed to landsite, this may result in the alien seed spreading even into the no go areas. The contractor must monitor the newly cleared areas and areas where alien vegetation was removed to ensure alien vegetation does not re-establish.

### 6.2 Water Management

The contractor has abstracted **818 m<sup>3</sup>** of water from Sluice 16 and about **198 m<sup>3</sup>** water were abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The GA allows for abstraction of 43 000m<sup>3</sup> annually, the contractor must ensure water abstraction does not exceed the licenced volumes.

### 6.3 Soil Management

Cleared topsoil must be protected from erosion and alien vegetation establishment. Alien vegetation has established on the stockpiles and must be cleared. Significant soil erosion was noted on the PV areas and the access. The measures outlined in the Stormwater Management plan must be implemented to prevent further erosion and damage to the infrastructure onsite. Eroded areas must be filled up to correct the effects of erosion. Berms that have been developed must be protected from erosion by planting indigenous vegetation.

### 6.4 Stormwater and Erosion onsite

Although contractor's Stormwater Management Plan ("**SWMP**") was approved and some measures implemented, erosion and water ponding were observed on the road, laydown areas and the solar fields. The road near PV2 area was washed away by stormwater and must be fixed. The SWMP must be assessed to check if it is aligned with the changes onsite.

## **7 INFRASTRUCTURE MANAGEMENT**

### **7.1 Access Roads**

The project team is using existing farm roads for current construction activities until such time as the project access roads and internal roads have been constructed. Since erosion and water ponding were observed contractor must maintain access roads. Maintenance of the access roads must be done on a regular basis.

### **7.2 Fences, Gates, and Barricading**

The site is fenced with security personnel manning the access gates. Access cards are used to allow entrance to site. Barricading was observed on site, and such should continue to be maintained around all open excavations to prevent potential fauna (wildlife and livestock) incidents. The contractor must ensure trenches for cables on are barricaded at the end of each working day. The contractor is advised to work on small sections at a time to ensure that there is enough material to barricade the open trenches.

### **7.3 Buildings and Structures**

Containers have been established on site by various subcontractors that are being used as offices. Male and female ablution facilities have been provided. Chemical toilets and a conservancy tank are used to manage sewer onsite. The contractor must ensure the bund meets the requirements such as ventilation and capacity as outlined in the EMPr. A waste station has been established at V3. The waste station constitutes a bunded areas for the storage of hazardous waste and varies compartments where waste will be segregated into. A sump was constructed to capture wastewater.

## **8 SOCIAL RESPONSIBILITY**

Any complaints from the public are to be recorded on complaints register maintained by the Contractor whose responsibility it is to track and resolve the complaints/issues that are raised. In addition, a box for receiving internal grievances is present at the main site office facility which allows for project staff to bring to the attention of the project management team any comments and or concerns.

## 9 ENVIRONMENTAL AWARENESS AND TRAINING

The contractor has undertaken Toolbox talks for the month of December 2025 covering the following topics:

- Importance of drip trays toolbox
- Environmental Awareness
- Smoking policy
- Disciplinary Code of Conduct
- Smoking Policy
- Housekeeping on site
- 16 Days of Activism
- Bees on site
- Hazardous Management Plan
- Sewage Management Plan

## 10 HERITAGE

In the event of any unknown artefacts being uncovered during construction, the ESCO and Project Manager must be informed immediately who must then instruct work to be stopped in the immediate area and then promptly report the discovery/finding to the ECO, a heritage specialist and the relevant heritage authority to investigate and confirm if such discovery is in fact a heritage artefact of any significance. No activities impacting upon any heritage sites were reported during this reporting period.

A barricade net was placed around the graves near the main gate to ensure the site is not disturbed by trucks moving excess topsoil.

## 11 WARNING & NCRS

No NCR reports were issued by the ECO in the month of December 2025.

## 12 REHABILITATION

No rehabilitation works have commenced during this period; further rehabilitation is expected to occur on the project as and when other works have been completed.

## 13 INCIDENTS AND ACCIDENTS

All environmental related events, incidents and accidents are to be reported directly to the ECO and kept on a central register and included in the monthly report. No environmental incidents that are reportable under Section 30 of the NEMA occurred in December 2025. A register of environmental incidents is attached as **Annexure C**.

## 14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 17<sup>th</sup> of December 2025 with observations documented in this report. Monthly ECO compliance reports are submitted to the Department (**DFFE**) by the ECO.

## 15 AUDIT METHODOLOGY

This section provides an overview of the methods employed in making observations and providing recommendations and conclusions derived from the audit procedures undertaken.

### 15.1 Audit Process

The site visit, data reviews and report drafting were undertaken by the ECO/auditor. The audit included the following procedures:

- **Site Inspections.** The areas and aspects covered during the inspections with concurrent discussions with the ESCO and site-based representatives of the EA holder included *inter alia*:
  - i. Access control to the sites.
  - ii. Ecologically sensitive areas, where applicable.
  - iii. Waste management.
  - iv. Incident and complaints management.
  - v. Landowner relations.
  - vi. Infrastructure management.
  - vii. Environmental Awareness.
  - viii. Record-keeping and document control.
  - ix. Stormwater and Erosion management
- **Documentation review.** This included:
  - i. A review of the EAs, EMPs and where applicable, method statements.
  - ii. A review of previous audit reports, records, observations, and findings.
  - iii. A review of any remedial and/or protective measures implemented.
  - iv. Identification, if applicable, any gaps requiring action and/or rectification.
- **Audit Report compilation.** This included:
  - i. Recording any observations and findings identified during the audit.
  - ii. Providing recommendations relating to improvement or non-compliance, if and where applicable.

## 15.2 Observation and Recommendation Determination

Observations and subsequent recommendations were based on and are limited to the following:

- i. Available documentation and records viewed or received prior, subsequent, or during the site visit.
- ii. Observations made during the period that the ECO/auditor was on site; and
- iii. Information received from both direct and cross-referenced discussions with permanent site-based staff.

## 15.3 Findings

Any key findings highlighted in this report will indicate areas and/or aspects that require improvement or rectification. The purpose of summarising the findings is to allow the EA holder to identify common management challenges that effect the level of compliance to the conditions of the EAs and EMPs.

Where findings and recommendations pertaining are deemed significant through compliance status or performance, they are documented as specific issues in the report. All site-specific observations are recorded in the corresponding audit checklist tables.

## 15.4 Audit Tables and Compliance Ratings

The audit table captures observations and recommendations made in relation to the conditions stipulated in the EAs and EMPs. It provides the reader with more detailed information in terms of what the stipulated requirements are in relation to the organisation's assessed current compliance status, according to the observations recorded by the auditor.

Ratings are calculated based on a scoring system whereby each auditable condition is provided with a score as highlighted in **Table 3** below.

**Table 4:** Compliance rating and scoring.

| Status                              | Compliance Rating |         | Description                                                                                                                                                                                |
|-------------------------------------|-------------------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | Abbreviation      | Scoring |                                                                                                                                                                                            |
| <i>Compliant</i>                    | C                 | 2       | <i>No improvements required</i>                                                                                                                                                            |
| <i>Partially Compliant</i>          | PC                | 1       | <i>Minor improvements required</i>                                                                                                                                                         |
| <i>Non-Compliant</i>                | NC                | 0       | <i>Major improvements required</i>                                                                                                                                                         |
| <i>Work in Progress</i>             | WiP               | -       | <i>Environmental management measures are underway but not yet fully implemented or verified, requiring further monitoring and assessment.</i>                                              |
| <i>Not Applicable / Not Audited</i> | NA                | -       | <i>No improvements required and / or the condition is either not, not yet or no longer relevant at the time of the audit</i>                                                               |
| <i>Informative</i>                  | info              | -       | <i>These relate to informative elements that provide either useful information or are descriptive in the explanation and understanding of statements or concepts in the audit criteria</i> |

Each condition has been ascribed a colour-coded status indicator of Compliant (green), Partially Compliant (orange), major-compliant (red), Not Auditable/Audited (grey), Work in Progress (light red) and Informative (blank/white) to assist the reader in determining aspects that require attention to improve on compliance achieved, if and where applicable. No compliance scoring is attributed any of the audit criteria information pertaining to the following three audit status symbols, namely 'NA', 'WiP', and 'info' as they were either not auditable and/or were not applicable/relevant at the time the audit was undertaken. In other words, they are excluded from the overall compliance rating calculations.

An overall compliance rating is calculated as a percentage to provide the reader with an overview of compliance to the relevant audit criteria however each condition should be considered on its own merits as the ratings do not necessarily portray the severity or impact of the reported finding relating to a condition.

## 16 ASSUMPTIONS AND LIMITATIONS

The ECO compliance audit and associated report are based upon the assumptions that:

- i. Documentation provided to the ECO/auditor is factual and true.
- ii. The audit is based purely on the conditions as stipulated in the EAs and EMPs.
- iii. The construction phase is currently underway and operational phase activities are not applicable.
- iv. Documentation / reports were randomly sampled / reviewed in order to accommodate time constraints.
- v. Where visual observations were not possible either due to physical access constraints or safety constraints, the ECO/auditor used other means to determine compliance, either through requesting written evidence provided by contractors / service providers who service the site or via interviews with technical site-based staff.

## 17 CONSULTATION PROCESS

The approach of consultation followed during the environmental audit was based on written (email) and telephonic correspondence between the ECO/auditor and the Environmental Site Compliance Officer which also includes consultation and communication with the EA holder and competent authority in terms of report submission.



## 18 FINDINGS

Findings are listed in the attached checklists, and it should be noted that findings should be considered individually in the context of the full audit and each condition and associated rating.

The following findings were noted onsite:

- Alien vegetation was observed on the cleared PV areas and stockpiles.
- Access road in bad condition due to erosion and water ponding.
- Some trenches were not barricaded, the EMPr requires trenches to be barricaded at the end of end working day.
- Cleared vegetation is not being removed to the landfill site on time which has resulted in some of the cleared vegetation being eroded dispersing alien vegetation seeds.
- Majority of machines were standing with no drip trays increasing the chances of spillages causing soil and water pollution

Based on the outcomes of the audit it was established that the objectives of the EAs and EMPrs were achieved in terms of:

- i. *Sufficiently providing for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis.*
- ii. *Ensuring compliance with the provisions of environmental authorisation and EMPr.*

### 18.1 Minor improvements required.

- Use drip trays on all standing equipment.
- Remove cleared alien vegetation to the landfill site.

### 18.2 Major improvements required.

- Clearance of alien vegetation must be done on all affected areas.
- Road maintenance must be done.
- Waste must be removed more frequently onsite.
- Install draining systems and oil separators on the chemical bunds.
- All trenches must be barricaded.
- Stormwater measures must be implemented.

## 19 AUDIT SUMMARY

In terms of the findings and results of the **December 2025** ECO audit, the project achieved an overall **97.25 % compliance** rating with the conditions of the EAs and EMPs.

**Table 4:** Compliance Scoring

| No.                                       | Audit criteria                                                                             | Compliant (C) | Partially Compliant (PC) | Major-non-Compliant (NC) | Work in Progress | Normative (info) | Not Applicable / Not Audited (NA) | Percentage Score      |
|-------------------------------------------|--------------------------------------------------------------------------------------------|---------------|--------------------------|--------------------------|------------------|------------------|-----------------------------------|-----------------------|
| 1                                         | Environmental Authorisation for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1) | 24            | 1                        | 0                        | 1                | 20               | 2                                 | (98%)                 |
| 2                                         | Environmental Authorisation for Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)   | 24            | 1                        | 0                        | 1                | 20               | 2                                 | (98%)                 |
| 3                                         | Environmental Authorisation for Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101)   | 24            | 1                        | 0                        | 1                | 20               | 2                                 | (98%)                 |
| 4                                         | EMPr for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)                        | 257           | 19                       | 0                        | 0                | 15               | 29                                | (96%)                 |
| 5                                         | EMPr Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)                              | 253           | 23                       | 0                        | 0                | 16               | 28                                | (95%)                 |
| 6                                         | EMPr Virginia 3 Solar Park (DFFE REF NO: 14/12/16/3/3/2/2101)                              | 227           | 14                       | 0                        | 0                | 43               | 39                                | (97%)                 |
| Overall total no. conditions              |                                                                                            | 809           | 59                       | 0                        | 3                | 134              | 102                               |                       |
| Audited conditions                        |                                                                                            | 1618          | 59                       | 0                        | -                | -                | -                                 | (Potential max score) |
| Overall Compliance Rating Calculation (%) |                                                                                            | 97.25%        |                          |                          |                  |                  |                                   |                       |

## 20 RECOMMENDATIONS

**Based on the findings identified the following is recommended:**

- Alien vegetation clearance must continue onsite; more resources must be allocated towards alien vegetation removal.
- Contractor to monitor newly cleared areas for alien vegetation establishment.
- All trenches must be barricaded at the end of each working day.
- All equipment must be equipped with a drip tray.
- Cleared alien vegetation must be taken to the landfill.
- Roads must be maintained to correct the effects of erosion and water ponding.
- Stormwater measures must be implemented, measures to be implement must align with the current conditions onsite.
- Drip trays must be used on all standing equipment including trucks waiting to be onboarded. .
- Waste must be removed from the waste area more frequently to prevent overstocking the waste area.
- To ensure berms are protected from erosion indigenous vegetation must be planted.

## 21 CONCLUSION

The contractor must ensure that systems and resources to monitor and manage environmental risks and impacts adequately are in place. Resources and personnel to train employees on the contents of the EMPs must be made to ensure that the project runs effectively and efficiently with minimal impact to the biophysical and socio-economic environment.

In general, the EMPs are effective in their current format in terms of content and relevance and there are no major shortcomings. The EMP's sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with this project.

**PREPARED BY:**

A handwritten signature in black ink, appearing to read 'Sakaunda'.

**Sakaunda Jennipher**

Environmental Control Officer

NCC Operations (Pty) Ltd

**M** ·069 510 7630

**E** · [jenniphers@ncc-group.co.za](mailto:jenniphers@ncc-group.co.za)

**REVIEWED BY:**

A handwritten signature in black ink, appearing to read 'Nick Gates'.

**Nick Gates**

Senior Environmental Consultant

NCC Operations (Pty) Ltd

**M** ·073 1998 431

**E** ·[nickg@ncc-group.co.za](mailto:nickg@ncc-group.co.za)

## ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

### Open Concerns/Complaint

| No | Observation date | Concern/Complaint | Suggested Due Date <sup>1</sup> | Proposed Corrective Action | Status | Closure status |
|----|------------------|-------------------|---------------------------------|----------------------------|--------|----------------|
|    |                  |                   |                                 |                            |        |                |

*\*The concerns register is updated once the ECO is present on site.*

### Closed Concerns

| No | Observation date | Concern/Complaint | Due Date suggested by ECO | Corrective Action Taken | Outcome | Closure status |
|----|------------------|-------------------|---------------------------|-------------------------|---------|----------------|
|    |                  |                   |                           |                         |         |                |
|    |                  |                   |                           |                         |         |                |

## ANNEXURE B - NCR REGISTER

| Ref No. | Originator | Dated Issued | Description | Proposed Corrective Action | Closure Status | Closure Date | Further Action Required |
|---------|------------|--------------|-------------|----------------------------|----------------|--------------|-------------------------|
|         |            |              |             |                            |                |              |                         |

## ANNEXURE C - INCIDENT REGISTER

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                     | Volume                                  | Remedial Action                                              |                                                                                |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                  |                                         | Immediate<br>Corrective<br>Actions                           | Preventative<br>measures                                                       |
| 20/03/2025 | Waste water                                                                                     | Soil pollution                                                                               | On 20, 2025, at approximately 8:28, the conservative tank being used to collect wastewater from conservancy tank had overfilled, and a Spillage had occurred spillage of approximately 8-10 litres of wastewater mixed with the cleaning material. the toilet supplier attended to the spill immediate & initiated spill Clean-up. Contaminated soil was taken to the hazardous waste skip. | 10 l (below<br>Section 30<br>threshold) | Clean- up must be done as soon as the spills are identified. | The conservancy tank must be emptied more frequently to reduce overfilling.    |
| 19/03/2025 | Waste water                                                                                     | Soil pollution                                                                               | Approximately 12 litres of wastewater mixed with the cleaning chemicals where toilets are located. The toilet had been leaking since the previous day, and wastewater was contained in a drip tray. The toilet supplier was notified, and he came to service. The toilets; however, during servicing; the drip tray spilled over causing the spillage of the wastewater onto the ground.    | 12l (below<br>Section 30<br>threshold)  | Clean- up must be done as soon as the spills are identified. | Leaking toilets must not be allowed onsite.                                    |
| 08/03/2025 | Diesel spillage                                                                                 | Soil pollution                                                                               | On 08 March 2025 at 05:30, security supervisor discovered a diesel leakage during the morning patrol. The spillage occurred due to the diesel injectors that were loose one of them was not properly fitted and diesel pressure removed them while the bakkie was in motion.                                                                                                                | 20l (below<br>Section 30<br>threshold)  | Clean- up must be done as soon as the spills are identified  | Vehicles must be maintained regular. only road worthy vehicles must be onsite. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                 | Volume                                   | Remedial Action                                             |                                                                                |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                              |                                          | Immediate Corrective Actions                                | Preventative measures                                                          |
| 07/03/2025 | Water and antifreeze                                                             | Soil pollution                                                             | The Driver parked the minibus on site, shortly a leak observed containing a mixture of water and antifreeze, while also exhibiting signs of overheating.                                                                                                                                                                                                                | -                                        | Clean- up must be done as soon as the spills are identified | Vehicles must be maintained regular. only road worthy vehicles must be onsite. |
| 06/05/2025 | Water mixed with antifreeze spillage                                             | Soil pollution                                                             | On 6 May 2025 at 14:00, the TLB Operator was busy moving spoil material near the access road to the allocated spoil Stockpile area, when the TLB, radiator fan belt snapped & the container that stores water & antifreeze busted. Approximately 5 Liters of water with antifreeze spilled                                                                              | 5 litres<br>(below Section 30 threshold) | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.                  |
| 08/05/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | A chemical toilet in PV3 at the laydown area at around 3:53 pm, 08 May 2025 was reported to be leaking, when the toilet was assessed, it was identified that there was a broken pipe that leaked the chemical water. An immediate action was taken to clean up the spillage. The contaminated soil was collected into the bags and taken to site waste management area. | 6 litres (below Section 30 threshold)    | Clean- up must be done as soon as the spills are identified | The maintenance/servicing of the toilets is to be made more stringent.         |
| 12/05/2025 | Diesel spillage                                                                  | Soil pollution                                                             | On 12-05-2025 at 06:40, the ambulance was on the way to the access control point along the main access road, when it had a sudden breakdown and diesel was spilled along the access road, leaving a trail of diesel spill for approximately +-400 Metres. Approximately +-2 Litres of diesel was spilled                                                                | 2 litres (below Section 30 threshold)    | Clean- up must be done as soon as the spills are identified | All Vehicles must be serviced regularly to reduce breakdowns.                  |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Volume                                                  | Remedial Action                                              |                                                                                      |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                         | Immediate<br>Corrective<br>Actions                           | Preventative<br>measures                                                             |
| 15/05/2025 | Hydraulic oil<br>spillage                                                                       | Soil pollution                                                                               | On the 15/05/2025, a side tipper truck was transporting spoil material when the cylinder failed and spilled ~7 litres of hydraulic oil, about 455m from the nearest watercourse. The contaminated soil was promptly cleaned up.                                                                                                                                                                                                                                                                                                                  | 7 litres ( <i>below<br/>Section 30<br/>threshold</i> )  | Clean- up must be done as soon as the spills are identified  | All Vehicles must be serviced regularly to reduce breakdowns.                        |
| 20/05/2025 | Toilet Cleaner<br>mixed with water<br>spillage                                                  | soil pollution                                                                               | It was around 11:30 am when it was reported that there was a spillage, that when the Fidamo team was about to clean the toilets at Pv1 Laydown area, a pipe from the generator busted and the water leaked from the broken pipe. The water that spilled was approximately 3-4 Liters and the pipe was immediately stopped. The chemical that was in the water is blue splash Toilet chemical. An immediate action was taken to clean up the spillage. The contaminated soil was collected into the bags and taken to site waste management area. | 4 litres ( <i>below<br/>Section 30<br/>threshold</i> )  | Clean- up must be done as soon as the spills are identified  | The maintenance/servicing of the toilets is to be made more stringent.               |
| 21/05/2025 | Fauna                                                                                           | Loss of<br>biodiversity                                                                      | On the 21/05/2025 a snake was fatally wounded during the internal road construction works.                                                                                                                                                                                                                                                                                                                                                                                                                                                       | N/A                                                     | The dead animal was buried.                                  | N/A                                                                                  |
| 26/05/2025 | Hydraulic oil<br>spillage                                                                       | Soil pollution                                                                               | On 26/05/2025, at around 16:50 a drill rig operator noticed a leak from the machine, he immediately reported the leak to the supervisor. The supervisor called the mechanic but did not report the spillage. The oil further spilled to the soil during the repair attempts which were done under poor lighting. The spillage was left overnight and was only reported to the EO the next morning when the shift began.                                                                                                                          | 25 litres ( <i>below<br/>Section 30<br/>threshold</i> ) | Clean- up must be done as soon as the spills are identified. | The ESCO issued NCR to the subcontractor for failing to report spillage immediately. |



| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                             | Volume                                                              | Remedial Action                                                                                            |                                                                                                               |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                     | Immediate Corrective Actions                                                                               | Preventative measures                                                                                         |
| 11/06/2025 | Concrete and oil Spillage                                                        | Soil pollution                                                             | On the 11 <sup>th</sup> of June 2025 the concrete mixer truck overturned resulting in the spillage of an estimated 3m3 (3 cubic meters) of concrete and approximately 8litres of diesel. The contractor removed the spilled concrete and dumped it on the natural area adjacent to the road                                                                                                                                                         | 8 litres of diesel and 3m3 of concrete (below Section 30 threshold) | Clean- up must be done as soon as possible and an investigation must be done on the cause of the accident. | The ESCO issued an NCR to the subcontractor for failing to report dumping concrete on the natural vegetation. |
| 16/06/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | At 08:32am, on the 16th of June 2025, The Client (Robin) reported that ABLON's Ablution facilities were leaking which resulted to soil contamination, we immediately stopped everyone from using the Toilet and reported the issue to our service provider. A drip tray was placed immediately underneath the toilet. The event occurred at the OHL Site Camp and the name of the chemical that spilled on the ground is Portabloo Toilet Chemical. | 30 litres (below Section 30 threshold)                              | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin.        | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced.              |
| 24/06/2025 | Toilet Cleaner mixed with water spillage                                         | Soil pollution                                                             | At around 8 am on the 24/06/2025 a spillage was reported by the contractor. Approximately 30 litres of Toilet Blue was spilled at the Virginia 1 laydown area. The spillage was cleaned up and the contaminated soil removed for disposal.                                                                                                                                                                                                          | 30 litres (below Section 30 threshold)                              | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin.        | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced.              |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Volume                                          | Remedial Action                                                                                                                                    |                                                                                                  |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                 | Immediate Corrective Actions                                                                                                                       | Preventative measures                                                                            |
| 08/07/2025 | Hydraulic Oil Spillage                                                           | Soil pollution                                                             | A tipper truck spilled some hydraulic oil when the driver was offloading some excavated material at PV2 I8 road on the 08h of July 2025. The driver lifted the truck to off load the material when it was halve way up, he discovered that the body of the truck was swinging to the sides and he tried to stop, and discovered some oil leaks from the hydraulic cylinder, about +-9 litres of oil spilled to the ground and it was reported to the EO, immediately the supervisor and the driver cleaned the spillage and the contaminated soil was collected into bags and taken to ABC Solar Waste management area. | 30 litres ( <i>below Section 30 threshold</i> ) | The contaminated soil was removed using shovel and the soil was contained in a hazardous waste bin.                                                | Vehicles that are constantly breaking down must be moved off site.                               |
| 08/07/2025 | Hydraulic Oil Spillage                                                           | Soil pollution, Loss of vegetation                                         | A tipper truck spilled some hydraulic oil when the driver was offloading some excavated material at PV2 I8 road on the 08h of July 2025. The driver lifted the truck to off load the material when it was halve way up, he discovered that the body of the truck was swinging to the sides and he tried to stop, and discovered some oil leaks from the hydraulic cylinder, about +-9 litres of oil spilled to the ground and it was reported to the EO, immediately the supervisor and the driver cleaned the spillage and the contaminated soil was collected into bags and taken to ABC Solar Waste management area. | +/-9L                                           | The spillages were cleaned, and the contaminated soil was removed and stored in bags and taken to waste management area at ABC solar laydown area. | Vehicles that are constantly breaking down must be moved off site.                               |
| 13/08/2025 | Sewage spillage                                                                  | Soil pollution, Loss of vegetation                                         | A pipe from the pump got broken when the driver was reversing and it started to spill approximately 4 litres of sewage water, at PV2 block 15 at 2:18 pm and immediately after noticing the spills, he immediately stopped the car. He immediately cleaned and it was reported to the EO. Proper cleaning was further done by Fidamo's (toilet supplier) team members.                                                                                                                                                                                                                                                  | 4                                               | The spillages were cleaned, and the contaminated soil was removed and stored in bags and taken to waste                                            | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                          | Volume   | Remedial Action                                                                                                                                |                                                                                                  |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                       |          | Immediate<br>Corrective<br>Actions                                                                                                             | Preventative<br>measures                                                                         |
|            |                                                                                                 |                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                  |          | management<br>centre in Virginia 3.                                                                                                            |                                                                                                  |
| 15/08/2025 | Toilet chemical<br>spillage                                                                     | Soil pollution                                                                               | Toilet chemical spill at Tower 29. The Toilet Pump burst, and the chemical spilled into the ground contaminating the soil. The Environmental Officer immediately attended to the spill. A drip tray was placed immediately under the Toilet to contain the spillage. The volume of the chemical spill is approximately 4.5liters A spade is used to remove the contaminated soil. The contaminated soil was placed inside a hazardous waste bin. | +/- 4.5L | The spillages were cleaned, and the contaminated soil was removed and stored in bags and taken to waste management area at Ablon laydown area. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 26/08/2025 | Engine oil spillage                                                                             | Soil pollution                                                                               | A tractor towing a trailer filled with poles experienced an engine malfunction, resulting in the leakage of at least 7 litres of engine oil on the main access road near the MV trenches.                                                                                                                                                                                                                                                        | +/- 7L   | Absorbent material was used to absorb the engine oil from the compacted gravel road and later taken for disposal as hazardous waste.           | Vehicles that are constantly breaking down must be moved off site                                |

| Date       | Type                                                                                           | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Volume  | Remedial Action                                                                                            |                                                                                                  |
|------------|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna &Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |         | Immediate<br>Corrective<br>Actions                                                                         | Preventative<br>measures                                                                         |
| 09/09/2025 | Toilet chemical spillage                                                                       | Soil pollution                                                                               | A chemical toilet in PV1 block 1 around 9:00 am, 09 September 2025 was reported to be leaking, when the toilet was assessed, it was overfull that resulted in overflowing. An immediate action was taken to clean up the spillage, however during the cleaning process the weather changed we experienced some lightning, and they had to stop. It was about 8-10 litres of chemical water that spilled. Then after lunch the weather was conducive to proceed with work, and they properly cleaned the spillage, and the contaminated soil was collected into | +/- 9L  | The spillage was cleaned, and the contaminated soil was removed and stored in bags, taken to ABC lay down. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 12/09/2025 | Toilet chemical spillage                                                                       | Soil pollution                                                                               | At 10:58 while on the way to use the toilet Wanga witnessed that the toilet is leaking & reported immediately to the HDEC EO.                                                                                                                                                                                                                                                                                                                                                                                                                                  | +/- 10L | Drip trays placed to contain the leakage. Absorbent was spread on the area where spill occurred.           | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 01/10/2025 | Toilet chemical spillage                                                                       | Soil pollution                                                                               | Approximately 8 litres of water and toilet blue mixture was spilled, a drip tray was placed under the toilet however not at the leaking points.                                                                                                                                                                                                                                                                                                                                                                                                                | +/- 8L  | The spillage was cleaned, and the contaminated soil was removed and stored in bags, taken to WMC.          | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |

| Date       | Type                                                                             | Impact                                                                     | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                             | Volume   | Remedial Action                                                                                  |                                                                                                  |
|------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|--------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|            | Chemical Spill/ Sewage/ Waste/ Fauna & Flora/ Fire/ Water/ Administrative/ Other | Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                          |          | Immediate Corrective Actions                                                                     | Preventative measures                                                                            |
| 02/10/2025 | Toilet chemical spillage                                                         | Soil pollution                                                             | A pipe from the pump inside the mobile toilet broke and started leaking, which caused a spillage that was discovered by EO. Approximately 10 litres of toilet blue chemical spilled. Upon discovery the service provider was notified and attended to the spillage.                                                                                                                                                                 | +/-10L   | The spillage was cleaned, and the contaminated soil was removed to WMC.                          | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 03/10/2025 | Hydraulic oil spillage                                                           | Soil pollution                                                             | A hydraulic oil pipe on a front-end loader burst, resulting in a spill of nearly 10 litres of hydraulic oil. The operator stopped the equipment, informed the supervisor and put a drip tray beneath the machine. A cleanup was conducted around the machinery while waiting for a mechanic to arrive. Once on site, the mechanic repaired the pipe and then moved the machine to clean the area underneath the loader.             | +/-10L   | The spillage was cleaned, and the contaminated soil was removed to WMC.                          | Vehicles that are constantly breaking down must be moved off site                                |
| 13/10/2025 | Toilet chemical spillage                                                         | Soil pollution                                                             | The pump had a fault and stopped working which resulted in the Blue chemical spillage to the ground. Approximately 8 litres of Toilet Blue Chemical spilled. Upon discovery the service provider was notified and attended to the spillage.                                                                                                                                                                                         | +/- 8L   | Drip trays placed to contain the leakage. Absorbent was spread on the area where spill occurred. | The cause of the slippages must be investigated. Toilets that continue to leak must be replaced. |
| 21/10/2025 | Hydraulic oil spillage                                                           | Soil pollution                                                             | On the 21/10/2025 the Operator inspected his machine while completing his checklist, and everything was fine with no leaks, it was around 9:00 am, he removed the drip tray under the drilling machine and started the machine to warm up. When he released the rev-count the assistant operator from the machine that I was close to him called trying to make him aware that the machine was leaking, then he stopped the machine | 20 -25 L | Immediately the spillage was contained, absorbent and pillows were used                          | Vehicles that are constantly breaking down must be moved off site                                |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Volume | Remedial Action                                                                                                                                                                                                           |                                                                    |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |        | Immediate<br>Corrective<br>Actions                                                                                                                                                                                        | Preventative<br>measures                                           |
|            |                                                                                                 |                                                                                              | immediately switched off and saw the machine leaking, he put back the drip tray to collect the hydraulic oil unfortunately the oil had already gushed out, it was about 20-25 liters of hydraulic oil. When he checked the machine again, he found out that the hydraulic pipe has disjoined. Then reported to the safety officer on site.                                                                                                                                                                                                      |        | to contain the spillage. A TLB was used to clean up the contaminated soil and loaded in a skip bin and taken to waste management area                                                                                     |                                                                    |
| 24/10/2025 | Diesel spillage                                                                                 | Soil pollution                                                                               | On 23 October 2025, at approximately 10:52, an environmental incident occurred at PV3 Raubex Infra laydown area involving a diesel spill. The spill resulted from a fault in the site generator, which led to the release of diesel into the ground surface which was about 9l. The contaminated soil was disposed of to a hazardous waste skip at the Waste management facility at PV3. All necessary steps were taken to ensure the spill was contained and cleaned up efficiently, minimizing potential harm to the surrounding environment. | 9 L    | Immediate action was taken to contain the spill using spill kit absorbents available on site. The incident was promptly reported to the Construction Manager and Environmental Officer. To mitigate further environmental | Vehicles that are constantly breaking down must be moved off site. |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                                                                                                                                                                                                                                                                                                                                    | Volume | Remedial Action                                                                                                                                                                 |                                                                                                                  |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                                                                                                                                                                                                                                                                                                                                 |        | Immediate<br>Corrective<br>Actions                                                                                                                                              | Preventative<br>measures                                                                                         |
|            |                                                                                                 |                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                            |        | impact, a TLB (Tractor-Loader-Backhoe) was dispatched to assist with the cleanup. The contaminated soil was collected and placed into black bags designated for hazardous waste |                                                                                                                  |
| 13/11/2025 | Deferential oil spillage                                                                        | Soil pollution                                                                               | The grader got stuck in the mud at PV3 in block 24 around 09:10 am. When the reversed, he heard a sound, and he stopped to check, and he found out that the back right side wheel shaft was broken and the wheel was leaning on the side of the grader. The TLB and front-end loader were used to push grader out of the mud. While doing so about 14-15 litres of transmission oil spilled on the ground. | +/-15L | The spillage was cleaned, and the contaminated soil was removed to WMC.                                                                                                         | The cause of the spillage must be investigated Vehicles that are constantly breaking down must be moved off site |

| Date       | Type                                                                                            | Impact                                                                                       | Description of Incident                                                                        | Volume | Remedial Action                                                         |                                      |
|------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|--------|-------------------------------------------------------------------------|--------------------------------------|
|            | Chemical Spill/<br>Sewage/ Waste/<br>Fauna & Flora/<br>Fire/ Water/<br>Administrative/<br>Other | Water<br>pollution/ Soil<br>pollution/ Air<br>pollution/<br>Erosion/<br>Biodiversity<br>etc. | What, Where, When, How, Why did it happen?                                                     |        | Immediate<br>Corrective<br>Actions                                      | Preventative<br>measures             |
| 17/11/2025 | Hydraulic oil<br>spillage                                                                       | Soil pollution                                                                               | A hydraulic pump of a drilling machine broke its shaft; the machine started to drip some oil . | +/-20L | The spillage was cleaned, and the contaminated soil was removed to WMC. | Drip tray must be used all the time. |



## **ANNEXURE D – PHOTOGRAPHS**



**Figure 1:** Condition of some portions of the access roads.



**Figure 2:** Alien Vegetation on stockpiles.



**Figure 3:** Poor waste management practices.



**Figure 4:** Overflowing sump at the waste area.



**Figure 5:** Constructed stormwater berms



**Figure 6:** Machinery standing with no drip trays.





**Figure 7:** Damage to the road caused rainwater.



**Figure 8:** Rainwater that accumulated in the drip that must be disposed as hazardous waste.



**Figure 9:** Stockpile height exceeding 2m.

**THIS PAGE WAS INTENTIONALLY LEFT BLANK**