

ECO REPORTS

2026

JANUARY 2026



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:

January 2026

PREPARED BY:

NCC Operations

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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 February 2026

Environmental Control Officer

NCC Operations (Pty) Ltd

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ABBREVIATIONS

BAR	Basic Assessment Report
CA	Competent Authority
DEA	Department of Environmental Affairs (now DFFE)
DFFE	Department of Forestry, Fisheries, and the Environment
DWS	Department of Water and Sanitation
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
EO	Environmental Officer (Contractor)
ER	Employer's Representative
ESCO	Environmental Site Compliance Officer
kV	Kilovolt
MVA	Megavolt Amperes
MW	Megawatt
NCC	NCC Operations
NCR	Non-Compliance Report
NEMA	National Environmental Management Act (No. 107 of 1998)
NWA	National Water Act (No. 36 of 1998)
OHPL	Overhead Power Line
SDC	Safe Disposal Certificate
SHE	Safety, Health, and Environment
SS	Substation
TBC	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/AM1)
- 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/AM1)

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 Solar Park Switching Station	14/12/16/3/3/2/2099/2	11 September 2023	Terramanzi Group (Pty) Ltd	October 2023
Virginia Solar Park OHPL	14/12/16/3/3/1/2444/A M1	26 June 2023	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 21st of January 2026 after which this report was compiled which serves to document and audit. This report covers the monthly reporting for the month of January 2026.

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.

Company	NCC Operations (Pty) Ltd
Auditor	Jennipher Sakaunda
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Affiliation	International Association of Impact Assessment South Africa. Environmental Assessment Practitioner Association of South Africa. South African Council of Natural Scientific Professions.
Qualifications	BSc (honors) Environmental Management
Expertise	A detailed CV can be provided on request.

3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (January 2026) 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 21st of January 2026. 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.

Several water damaged monopole concrete slabs had to be removed along the line; these generated a significant amount of rubble. The contractor must ensure this rubble is timely removed and disposed at a registered landfill site.

4.1 Domestic/ General Waste

A total of **2 507 kg** of general waste was generated on site in the month of January 2026; **1 099 kg** constituting boxes and wooden pallets were recycled. A total of **1408 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 transfer to the licensed waste facilities. Bins at the laydown area are colour coded for each waste type.

Due to the significant rainfall received on site most of the wood pallets were water damaged and cannot be recycled. The damaged pallets must be disposed at the Matjhabeng Local Municipality waste disposal 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.

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 **2 977 kg** of hazardous waste in January 2026. 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 **58 410.5 L** of sewerage waste was generated on site in the month of January 2026. 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. The contractor is proposing to use herbicides to eradicate alien vegetation onsite. The contractor must evaluate the Safety Data Sheets of the herbicides to ensure that the herbicides are safe to use. The project manager and the ECO must approve the herbicide before being applied. The landowner must give consent on the herbicide to be used to prevent future litigations.

6.2 Water Management

The contactor abstracted **1 112 m³** of water from Sluice 16 and about **249 m³** water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The GA allows for abstraction of 43 000m³ annually, the contactor 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 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 contactor must ensure subsoil is used for infilling. Topsoil must only be spread after the structures have erected to prevent compaction. The contactor must replace all the missing/broken topsoil/subsoil signs on the stockpiles.

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 January 2026 covering the following topics:

- Housekeeping
- Environmental Incidents and Reporting
- Environmental Awareness
- Housekeeping on site
- Concrete and Cement Use
- Smoking Policy
- Disciplinary Code of Conduct
- Environmentally compliant backfilling
- Wildlife Safety Management Plan
- Water Conservation On Site
- Snakes On Site and Reporting Procedure
- Drinking water transportation on site
- Housekeeping
- Hygiene

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 January 2026.

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. As the is approaching completion the contract must prepare a rehabilitation plan for approval by the ECO and the ESCOs.

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 January 2026. A register of environmental incidents is attached as **Annexure C**.

14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 21st of January 2026 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	
Compliant	C	2	No improvements required
Partially Compliant	PC	1	Minor improvements required
Non-Compliant	NC	0	Major improvements required
Work in Progress	WiP	-	Environmental management measures are underway but not yet fully implemented or verified, requiring further monitoring and assessment.
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 (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.
- Rubble from the from the demolished monopole concrete slabs was not removed from the construction 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 machines were standing with no drip trays increasing the chances of spills causing soil or water pollution.
- Overgrown grass was observed at the laydown areas covering material and equipment.
- An additional chemical bund was established to alleviate overcrowding in the existing bund.

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.
- Housekeeping must be done at the laydown 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.

- Maintaining the damaged access roads.
- Implement stormwater measures on the entire site.
- Ensuring that drip trays are placed under every standing machine.
- Remove the construction rubble from the construction area to the landfill.

19 AUDIT SUMMARY

In terms of the findings and results of the **January 2026** 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)	221	8	0	0	46	53	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		448	9	0	2	105	86	
Audited conditions		896	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.
- All construction rubble must be removed timeously from construction areas.
- 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.
- House keeping must be done at the laydown areas.

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:

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ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

Open Concerns/Complaint

No	Observation date	Concern/Complaint	Suggested Due Date ¹	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 (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/ 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 (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/ 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
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 th 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 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 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 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/ 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 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/ 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
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 thoroughly 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 (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 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
17/11/2025	Hydraulic oil spillage	Soil pollution	A hydraulic pump of a drilling machine broke its shaft; the machine started to drip oil.	+/-20L (below Section 30 threshold)	The spillage was cleaned, and the contaminated soil was removed to WMC.	Drip tray must be used all the time.
23/01/2026	Hydraulic oil spillage	Soil contamination	Approximately 18-20 litres of oil spilled when an excavator was offloaded from a truck at the onboarding area on PV 3. The driver drove to the parking lot and parked the machine and when he got off, he saw that it was spilling oil from the moment it was offloaded from the truck. A drip tray was immediately put a under the machine. He also found out that the hydraulic pipe busted during offloading. Negligence during the offloading process led to the oil spill.	18-20L	A drip tray was placed; however, the drip tray was damaged. The spill was cleaned using spill kits.	Drip tray must be used all the time.

ANNEXURE D – PHOTOGRAPHS



Figure 1: No-go area that must be demarcated



Figure 2: Rubble that must be removed from site.



Figure 3: Rainwater accumulated at Tower No. 13.



Figure 4: Spilled concrete must be removed before the end of the day.



Figure 5: Alien Vegetation on the stockpiles.



Figure 6: Topsoil stockpiles signs that must be replaced.



Figure 7: Housing must ne improved onsite.



Figure 8: A new chemical bund.

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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:

January 2026

PREPARED BY:

NCC Operations

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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 February 2026

Environmental Control Officer

NCC Operations (Pty) Ltd

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DOCUMENT CONTROL

REPORT TITLE	Monthly ECO Environmental Monitoring Report
PROJECT	Virginia Solar PV 1, 2, 3
LOCATION	Free State Province
EA HOLDER	URSA Energy (Pty) Ltd
ECO	NCC Operations (Pty) Ltd
REVISION	00
DATE	03/03/2026

Revision	Date	Description
Rev 00	03/03/2026	First Draft - Internal
Rev 01	TBC	Final - Authority submission

REPORT DISTRIBUTION LIST

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Tarryn Frankland	Red Rocket South Africa (Pty) Ltd		Electronic
Maggie Logan	Red Rocket South Africa (Pty) Ltd		Electronic
Director of Compliance	DFFE	TBC	Electronic

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ABBREVIATIONS

BAR	Basic Assessment Report
CA	Competent Authority
DEA	Department of Environmental Affairs (now DFFE)
DFFE	Department of Forestry, Fisheries, and the Environment
DWS	Department of Water and Sanitation
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
EO	Environmental Officer (Contractor)
ER	Employer's Representative
ESCO	Environmental Site Compliance Officer
kV	Kilovolt
MVA	Megavolt Amperes
MW	Megawatt
NCC	NCC Operations
NCR	Non-Compliance Report
NEMA	National Environmental Management Act (No. 107 of 1998)
NWA	National Water Act (No. 36 of 1998)
OHPL	Overhead Power Line
SDC	Safe Disposal Certificate
SHE	Safety, Health, and Environment
SS	Substation
TBC	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/AM2)
- 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101/AM2)

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	11 September 2023	Terramanzi Group (Pty) Ltd	October 2023
Virginia 2 Solar Park	14/12/16/3/3/2/2100/A M2	24 August 2023	Terramanzi Group (Pty) Ltd	October 2023
Virginia 3 Solar Park	14/12/16/3/3/2/2101/A M2	07 September 2023	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 21st of January 2026 after which this report was compiled which serves to document and audit. This report covers the monthly reporting for the month of January 2026

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.

Company	NCC Operations (Pty) Ltd
Auditor	Jennipher Sakaunda
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Address	26 Bell Close, Westlake Business Park Westlake, 7945
Affiliation	International Association of Impact Assessment South Africa. Environmental Assessment Practitioner Association of South Africa. South African Council of Natural Scientific Professions.
Qualifications	BSc (honors) Environmental Management
Expertise	A detailed CV can be provided on request.

3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (January 2026) 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 21st of January 2026. 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 varies compartments where waste is 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.

4.1 Domestic/ General Waste

A total of **2 507 kg** of general waste was generated on site in the month of January 2026; **1099 kg** constituting boxes and wooden pallets were recycled. A total of **1 408 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.

Due to the significant rainfall received on site most of the wood pallets were water damaged and cannot be recycled. The damaged pallets must be disposed at the Matjhabeng Local Municipality waste disposal 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.

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 **2 977 kg** of hazardous waste in January 2026. 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 **58 410.5 L** of sewerage waste was generated on site in the month of January 2026. 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 is proposing to use herbicides to eradicate alien vegetation onsite. The contractor must evaluate the Safety Data Sheets of the herbicides to ensure that the herbicides are safe to use. The project manager and the ECO must approve the herbicide before being applied. The landowner must give consent on the herbicide to be used to prevent future litigations

6.2 Water Management

The contractor has abstracted **1 112 m³** of water from Sluice 16 and about **249 m³** water were abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The GA allows for abstraction of 43 000m³ 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 area 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 January 2026 covering the following topics:

- Housekeeping
- Environmental Incidents and Reporting
- Environmental Awareness
- Housekeeping on site
- Concrete and Cement Use
- Smoking Policy
- Disciplinary Code of Conduct
- Environmentally compliant backfilling
- Wildlife Safety Management Plan
- Water Conservation On Site
- Snakes On Site and Reporting Procedure
- Drinking water transportation on site
- Housekeeping
- Hygiene

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 January 2026

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 January 2026. A register of environmental incidents is attached as **Annexure C**.

14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 21st of January 2026 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.
- 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.
- Erosion damage was observed on the road and PV areas.

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.
- All trenches must be barricaded.
- Stormwater measures must be implemented.

19 AUDIT SUMMARY

In terms of the findings and results of the **January 2026** ECO audit, the project achieved an overall **97.18 % 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)	255	20	0	0	16	29	(96%)
5	EMPr Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)	251	24	0	0	17	28	(96%)
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		805	61	0	3	136	102	
Audited conditions		1610	59	0	-	-	-	(Potential max score)
Overall Compliance Rating Calculation (%)		97.18%						

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.
- 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'.

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ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

Open Concerns/Complaint

No	Observation date	Concern/Complaint	Suggested Due Date ¹	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 (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/ 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 (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/ 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
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 spillage was left overnight and was only reported to the EO the next morning when the shift began.	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
11/06/2025	Concrete and oil Spillage	Soil pollution	On the 11 th 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/ 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
					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/ 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
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/ 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
			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/ 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
					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	
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17/11/2025	Hydraulic oil 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.
23/01/2026	Hydraulic oil spillage	Soil contamination	Approximately 18-20 litres of oil spilled when an excavator was offloaded from a truck at the onboarding area on PV 3. The driver drove to the parking lot and parked the machine and when he got off, he saw that it was spilling oil from the moment it was offloaded from the truck. A drip tray was immediately put a under the machine. He also found out that the hydraulic pipe busted during offloading. Negligence during the offloading process led to the oil spill.	18-20L	A drip tray was placed; however, the drip tray was damaged. The spill was cleaned using spill kits.	Drip tray must be used all the time.

ANNEXURE D – PHOTOGRAPHS



Figure 1: Condition of the access roads.



Figure 2: Alien vegetation on stockpiles.



Figure 3: Cleared vegetation requiring to be disposed of.



Figure 4: Erosion damage.



Figure 5: Constructed stormwater berms



Figure 6: Waste area.

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FEBRUARY 2026



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:

February 2026

PREPARED BY:

NCC Operations

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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 March 2026

Environmental Control Officer

NCC Operations (Pty) Ltd

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DOCUMENT CONTROL

REPORT TITLE	Monthly ECO Environmental Monitoring Report
PROJECT	Virginia OHPL Line and Switching Station
LOCATION	Free State Province
EA HOLDER	URSA Energy (Pty) Ltd
ECO	NCC Operations (Pty) Ltd
REVISION	00
DATE	03/03/2026

Revision	Date	Description
Rev 00	03/03/2026	First Draft - Internal
Rev 01	TBC	Final - Authority submission

REPORT DISTRIBUTION LIST

Name	Organisation	Issued	Format
Janine Brasington	Red Rocket South Africa (Pty) Ltd	03/03/2026	Electronic
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Director of Compliance	DFFE	TBC	Electronic

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ABBREVIATIONS

BAR	Basic Assessment Report
CA	Competent Authority
DEA	Department of Environmental Affairs (now DFFE)
DFFE	Department of Forestry, Fisheries, and the Environment
DWS	Department of Water and Sanitation
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
EO	Environmental Officer (Contractor)
ER	Employer's Representative
ESCO	Environmental Site Compliance Officer
kV	Kilovolt
MVA	Megavolt Amperes
MW	Megawatt
NCC	NCC Operations
NCR	Non-Compliance Report
NEMA	National Environmental Management Act (No. 107 of 1998)
NWA	National Water Act (No. 36 of 1998)
OHPL	Overhead Power Line
SDC	Safe Disposal Certificate
SHE	Safety, Health, and Environment
SS	Substation
TBC	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/AM1)
- 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/AM1)

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 Solar Park Switching Station	14/12/16/3/3/2/2099/2	11 September 2023	Terramanzi Group (Pty) Ltd	October 2023
Virginia Solar Park OHPL	14/12/16/3/3/1/2444/A M1	26 June 2023	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 EMPs 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 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 23rd of February 2026 after which this report was compiled which serves to document and audit. This report covers the monthly reporting for the month of February 2026.

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.

Company	NCC Operations (Pty) Ltd
Auditor	Jennipher Sakaunda
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Affiliation	International Association of Impact Assessment South Africa. Environmental Assessment Practitioner Association of South Africa. South African Council of Natural Scientific Professions.
Qualifications	BSc (honors) Environmental Management
Expertise	A detailed CV can be provided on request.

3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (February 2026) 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 23rd of February 2026. 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.

Several water damaged monopole concrete slabs had to be removed along the line; these generated a significant amount of rubble. The contractor must ensure this rubble is timely removed and disposed at a registered landfill site.

4.1 Domestic/ General Waste

A total of **20 592 kg** of general waste was generated on site in the month of February 2026; **4 734 kg** constituting boxes and wooden pallets were recycled. A total of **15 858 kg** of waste was 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 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 **6 391 kg** of hazardous waste in February 2026. 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 **95681.5 L** of sewerage waste was generated on site in the month of February 2026. 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. The contractor is proposing to use herbicides to eradicate alien vegetation onsite. The contractor must evaluate the Safety Data Sheets of the herbicides to ensure that the herbicides are safe to use. The contractor must consider using the herbicides both on solar fields and on the stockpiles. The project manager and the ECO must approve the herbicide before being applied.

The contractor abstracted **2 044m³** of water from Sluice 16 and about **443 m³** water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The GA allows for abstraction of 43 000m³ 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 the wetland area has dried up.

6.2 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.

6.3 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 February 2026 covering the following topics:

- Spill Prevention and Management
- Hazardous material plan
- Waste Separation on site
- Soil Erosion and Control
- Wildlife and Plant Protection on Site
- Grievance Policy
- Sensitive Area (Tower 14)
- Inclement weather
- Environmental Awareness
- Control of Hazardous Substances
- Smoking Policy
- Spill prevention and Management Awareness
- Housekeeping and Hazard Prevention
- Snake Awareness
- Spill prevention and 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 February 2026.

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. As the is approaching completion the contract must prepare a rehabilitation plan for approval by the ECO and the ESCOs.

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 February 2026. A register of environmental incidents is attached as **Annexure C**.

14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 21st of February 2026 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:

- 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.
- Rubble from the from the demolished monopole concrete slabs and the works at the switching station was not removed from the construction 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 machines were standing with no drip trays increasing the changes of spills causing soil or water pollution.
- Overgrown grass was observed at the laydown areas covering material and equipment.
- At truck was leaking at the main gate.
- Chemicals were placed in an uncovered bund.
- Chemical toilet was placed within 100m of the wetland area.

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.
- Housekeeping must be done at the laydown areas.
- Roof the chemical bund to prevent rainwater ingress.

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.
- Implement stormwater measures on the entire site.
- Ensuring that drip trays are placed under every standing machine.
- Remove the construction rubble from the construction area to the landfill or add another skip at the TSF area.

19 AUDIT SUMMARY

In terms of the findings and results of the **February 2026** 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)	221	8	0	0	46	53	98%
4	EMPr Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2)	176	2	0	0	22	27	99%
Overall total no. conditions		446	11	0	2	105	86	
Audited conditions		892	11	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 re-establishment of alien vegetation.
- All construction rubble must be removed timeously from construction areas.
- 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.
- House keeping must be done at the laydown areas.
- Roof the chemical bund to prevent rainwater ingress.
- Move the chemical toilet away from the wetland.

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.

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ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

Open Concerns/Complaint

No	Observation date	Concern/Complaint	Suggested Due Date ¹	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 (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/ 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 (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/ 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
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 spillage was left overnight and was only reported to the EO the next morning when the shift began.	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
11/06/2025	Concrete and oil Spillage	Soil pollution	On the 11 th 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 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 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 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/ 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 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/ 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
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 thoroughly 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 (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 Vehicles that are constantly breaking down must be moved off site
17/11/2025	Hydraulic oil spillage	Soil pollution	A hydraulic pump of a drilling machine broke its shaft; the machine started to drip oil.	+/-20L (below Section 30 threshold)	The spillage was cleaned, and the contaminated soil was removed to WMC.	Drip tray must be used all the time.

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
23/01/2026	Hydraulic oil spillage	Soil contamination	Approximately 18-20 litres of oil spilled when an excavator was offloaded from a truck at the onboarding area on PV 3. The driver drove to the parking lot and parked the machine and when he got off, he saw that it was spilling oil from the moment it was offloaded from the truck. A drip tray was immediately put a under the machine. He also found out that the hydraulic pipe busted during offloading. Negligence during the offloading process led to the oil spill.	18-20L	A drip tray was placed; however, the drip tray was damaged. The spill was cleaned using spill kits.	Drip tray must be used all the time.
05/02/2026	Hydraulic oil spillage	Soil contamination	The incident occurred as the driver was driving from the quarry to PV3 to dump material. The tipper truck was unable to lift the tipping body and dump the material. When the mechanic was removing the old oil pump and replacing it with a new one, some of the remaining oil in the pipe splashed onto the ground, about 6 litres.	6-8L	Some absorbents were spread on the affected area to absorb the oil.	None
23/02/2026	Hydraulic oil spillage	Soil contamination	A hydraulic hose on a front-end loader burst during operation, resulting in a hydraulic oil spill from the machine. The incident occurred outside the main gate of PV1 and PV2, approximately 80 m west of the main road at Virginia Solar Park. The operator was legally appointed by ML Nkosi to operate the front-end loader and had been on shift for approximately 4 hours at the time of the incident. Upon identifying the leak, the operator isolated the machine and positioned a drip tray beneath it before leaving the site to source the tools and parts required to carry out repairs.	3-5l	The affected area was cordoned off to prevent further disturbance of the contaminated soil. Oil absorbents were immediately spread over the affected area. The absorbent material was	None

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
					collected and placed in a heavy-duty sack. Visibly contaminated soil was excavated and placed into the same sack for disposal. The excavated area was subsequently backfilled and reinstated.	

ANNEXURE D – PHOTOGRAPHS



Figure 1: Chemical bund without a roof.



Figure 2: Water ponding and mud at the switching station



Figure 3: Construction Rubble at the switching station.



Figure 4: Toilet placed within 100 m of the wetland area.



Figure 5: Alien Vegetation on the stockpiles.



Figure 6: Trucks driving on the wetland area.



Figure 7: Rubble along the line.

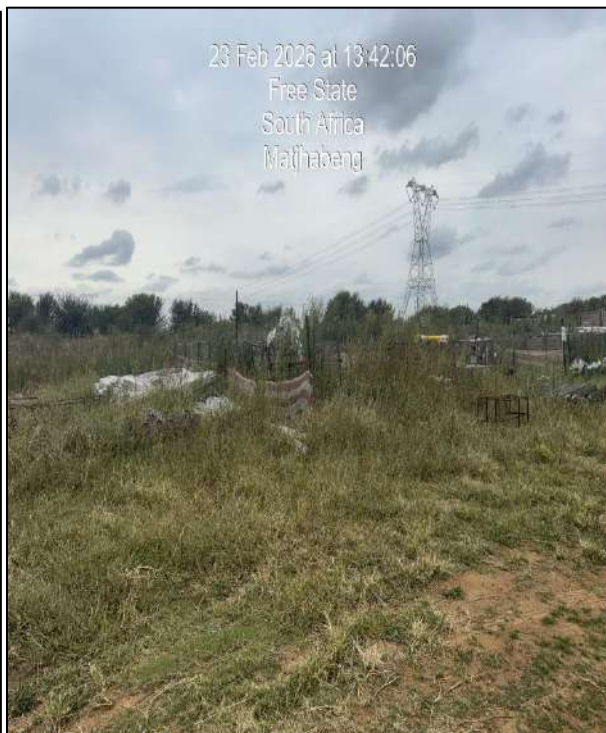


Figure 8: Housing keeping must be improved

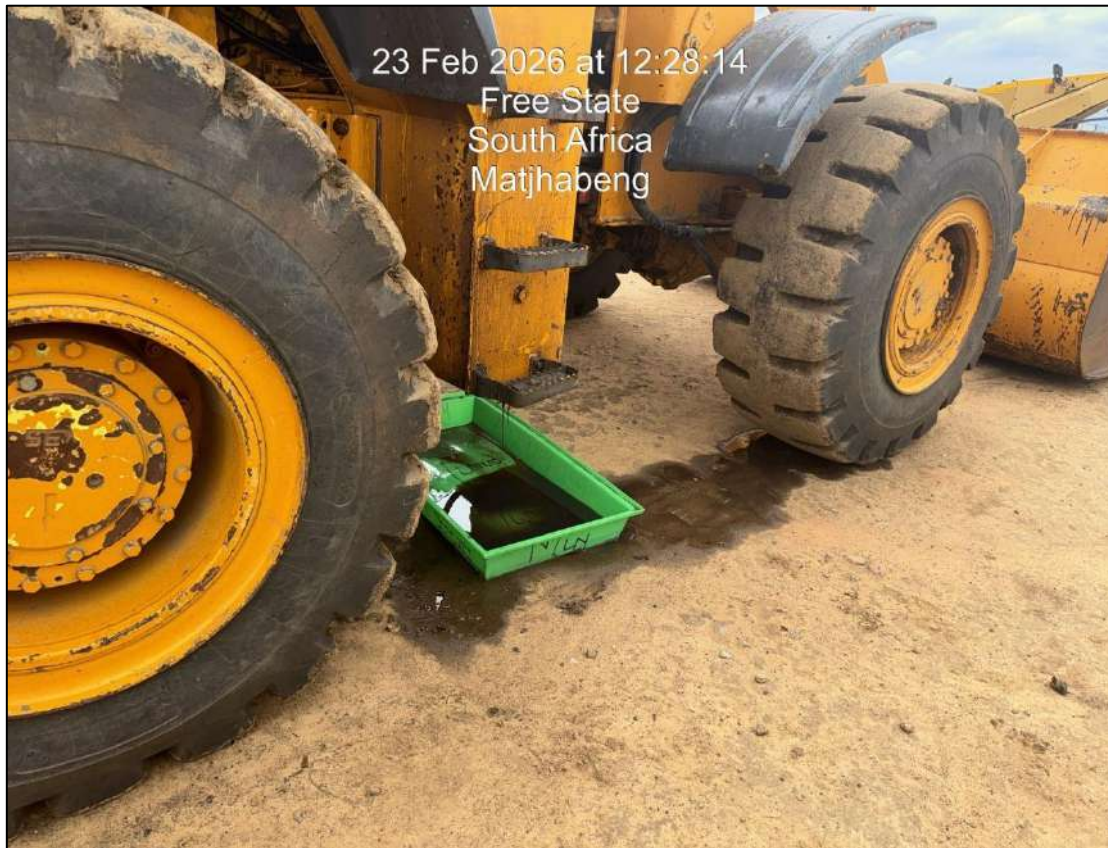


Figure 9: Leaking truck

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	SUMMARY OF RESULTS						
No.	COMPLIANCE WITH:	Compliant	Partially Compliant	Non-Compliant	Work in Progress	Normative (info)	Not Applicable / Not Audited
	Score	2	1	0	-	-	-
1	OHLEA	24	0	0	1	18	3
2	Switching Station EA	25	1	0	1	19	3
3	OHLEMPR	221	8	0	0	46	53
4	Switching Station EMPR	176	2	0	0	22	27
TOTAL		446	11	0	2	105	86
Total Score		892	11	0			

COUNT	AS %	COMMENTS
46	100%	
49	98%	
328	98%	
227	99%	
650	395.77%	

99%

METHODOLOGY	
Each element of the checklist is to be	
Compliant	2
Partially Compliant	1
Non-Compliant	0
Work in Progress	WiP
Not Applicable / Not Audited	NA
Informative	INFO
The total score, average score and percentage compliance for each aspect (all elements) is calculated.	

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Virginia OHL
Conditions
The 3x132kV powerlines for the connection of the Virginia 1, 2 & 3 solar parks to the Eskom Theseus Substation, located on the Matjhabeng and Masilonyana Local Municipalities, Free State Province is approved as per the geographic coordinates cited in the table above.
Authorisation of the activity is subject to the conditions contained in this Environmental Authorisation, which form part of the Environmental Authorisation and are binding on the holder of the authorisation.
The holder of the authorisation is responsible for ensuring compliance with the conditions contained in this Environmental Authorisation. This includes any person acting on the holder's behalf, including but not limited to, an agent, servant, contractor, sub-contractor, employee, consultant or person rendering a service to the holder of the authorisation.
The activities authorised must only be carried out at the property as described above.
Any changes to, or deviations from, the project description set out in this Environmental Authorisation must be approved, in writing, by the Department before such changes or deviations may be effected. In assessing whether to grant such approval or not, the Department may request such information as it deems necessary to evaluate the significance and impacts of such changes or deviations and it may be necessary for the holder of the authorisation to apply for further Environmental Authorisation in terms of the regulations.
The holder of an Environmental Authorisation must apply for an amendment of the Environmental Authorisation with the Competent Authority for any alienation, transfer or change of ownership rights in the property on which the activity is to take place.
This activity must commence within a period of ten (10) years from the date of issue of this Environmental Authorisation. If commencement of the activity does not occur within that period, the authorisation lapses and a new application for Environmental Authorisation must be made in order for the activity to be undertaken.
Construction must be completed within five (05) years of the commencement of the activity on site.
Commencement with one activity listed in terms of this Environmental Authorisation constitutes commencement of all authorised activities.
The holder of the authorisation must notify every registered interested and affected party, in writing and within 14 (fourteen) calendar days of the date of this Environmental Authorisation, of the decision to authorise the activity.
specify the date on which the authorisation was issued;
inform the interested and affected party of the appeal procedure provided for in the National Appeal Regulations, 2014:
advise the interested and affected party that a copy of the authorisation will be furnished on request;
and
give the reasons of the Competent Authority for the decision.
The authorised activity must not commence until the period for the submission of appeals has lapsed as per the National Appeal Regulations, 2014, and no appeal has been lodged against the decision. In terms of Section 43(7), an appeal under Section 43 of the National Environmental Management Act, Act No. 107 of 1998, as amended will suspend the Environmental Authorisation or any provision or condition attached thereto. In the instance where an appeal is lodged you may not commence with the activity until such time that the appeal has been finalised.
The site layout plans as attached as Annexure A (Site maps) of the BAR dated 8 December 2024 is approved.
The Environmental Management Programme (EMPr) submitted as part of the BAR dated 8 December 2021 is approved and must be implemented and adhered to.
The EMPr must be implemented and strictly enforced during all phases of the project. It shall be seen as a dynamic document and shall be included in all contract documentation for all phases of the development when approved.
Changes to the approved EMPr must be submitted in accordance to the EIA Regulations applicable at the time.
The Department reserves the right to amend the approved EMPr should any impacts that were not anticipated or covered in the BAR be discovered.
The EMPr must be updated where the findings of the environmental audit reports, contemplated in Condition 25 below, indicate insufficient mitigation of environmental impacts associated with the undertaking of the activity, or Insufficient levels of compliance with the environmental authorisation or EMPr.
The updated EMPr must contain recommendations to rectify the shortcomings identified in the environmental audit report.
The updated EMPr must be submitted to the Department for approval together with the environmental audit report, as per Regulation 34 of the EIA Regulations, 2014 as amended. The updated EMPr must have been subjected to a public participation process, which process has been agreed to by the Department, prior to submission of the updated EMPr to the Department for approval.
In assessing whether to grant approval of an EMPr which has been updated as a result of an audit, the Department will consider the processes prescribed in Regulation 35 of the EIA Regulations, 2014 as amended. Prior to approving an amended EMPr, the Department may request such amendments to the EMPr as it deems appropriate to ensure that the EMPr sufficiently provides for avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity.
The holder of the authorisation must apply for an amendment of an EMPr, if such amendment is required before an audit is required. The amendment process is prescribed in Regulation 37 of the EIA Regulations, 2014, as amended. The holder of the authorisation must request comments on the proposed amendments to the impact management outcomes of the EMPr or amendments to the closure objectives of the closure plan from potentially interested and affected parties, including the competent authority, by using any of the methods provided for in the Act for a period of at least 30 days.

The holder of the authorisation must appoint an experienced Environmental Control Officer (ECO) for the construction phase of the development that will have the responsibility to ensure that the mitigation/rehabilitation measures and recommendations referred to in this environmental authorisation are implemented and to ensure compliance with the provisions of the approved EMPr.
The ECO must be appointed before commencement of any authorised activities.
Once appointed, the name and contact details of the ECO must be submitted to the Director: Compliance Monitoring of the Department.
The ECO must keep record of all activities on site, problems identified, transgressions noted and a task schedule of tasks undertaken by the ECO.
The ECO must remain employed until all rehabilitation measures, as required for implementation due to construction damage, are completed and the site is ready for operation.
All documentation e.g., audit/monitoring/compliance reports and notifications, required to be submitted to the Department in terms of this environmental authorisation, must be submitted to the Director: Compliance Monitoring of the Department.
The holder of the environmental authorisation must, for the period during which the environmental authorisation and EMPr remain valid, ensure that project compliance with the conditions of the environmental authorisation and the EMPr are audited, and that the audit reports are submitted to the Director: Compliance Monitoring of the Department.
The frequency of auditing and of submission of the environmental audit reports must be as per the frequency indicated in the EMPr, taking into account the processes for such auditing as prescribed in Regulation 34 of the EIA Regulations, 2014 as amended.
The holder of the authorisation must, in addition, submit environmental audit reports to the Department within 30 days of completion of the construction phase (i.e. within 30 days of site handover) and a final environmental audit report within 30 days of completion of rehabilitation activities.
The environmental audit reports must be compiled in accordance with Appendix 7 of the EIA Regulations, 2014 as amended and must indicate the date of the audit, the name of the auditor and the outcome of the audit in terms of compliance with the environmental authorisation conditions as well as the requirements of the approved EMPr.
Records relating to monitoring and auditing must be kept on site and made available for inspection to any relevant and competent authority in respect of this development.
A written notification of commencement must be given to the Department no later than fourteen (14) days prior to the commencement of the activity. Commencement for the purposes of this condition includes site preparation. The notice must include a date on which it is anticipated that the activity will commence, as well as a reference number.
A written notification of operation must be given to the Department no later than fourteen (14) days prior to the commencement of the activity operational phase.
Should the activity ever cease or become redundant, the holder of the authorisation must undertake the required actions as prescribed by legislation at the time and comply with all relevant legal requirements administered by any relevant and Competent Authority at that time.
Construction activities should be restricted to the powerline servitude and pylon positions.
A 20m conservation buffer around the site Exigo-VSPL-HP01. Care must be taken during the construction process that if anything of archaeological and/or palaeontological value that is unearthed must be recorded and the archaeologist and SAHRA be notified.
The proposed powerlines must avoid sensitive areas such as drainage areas, while also allowing corridors of indigenous grassland and outcrops on areas outside the development footprint to be preserved.
An avifaunal walkthrough must be conducted by an avifaunal specialist within one month prior to the commencement of construction to identify breeding sites and ground-truth the final layout.
An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal where appropriate. Any solid waste must be disposed of at a landfill licensed in terms of Section 20 (b) of the National Environment Management Waste Act, 2008 (Act No.59 of 2008).
A copy of this Environmental Authorisation, the audit and compliance monitoring reports, and the approved EMPr, must be made available for inspection and copying- 38.1. at the site of the authorised activity;
National government, provincial government, local authorities or committees appointed in terms of the conditions of this authorisation or any other public authority shall not be held responsible for any damages or losses suffered by the holder of the authorisation or his/her successor in title in any instance where construction or operation subsequent to construction be temporarily or permanently stopped for reasons of non-compliance by the holder of the authorisation with the conditions of authorisation as set out in this document or any other subsequent document emanating from these conditions of authorisation.

Compliance		Findings & Recommendations
Finding	Score	
Informative	INFO	Information noted
Informative	INFO	
Informative	INFO	
Informative	INFO	
Informative	INFO	
Informative	INFO	
Compliant	2	construction has commenced
Work in Progress	WiP	project is in orogress
Informative	INFO	Noted
Compliant	2	Interested and Affected Parties have been notified and provied with information as required
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	Appeal period lapsed bofeore commencet
Informative	INFO	Noted
Informative	INFO	noted
Compliant	2	Biodiversity permits issued
Informative	INFO	
Informative	INFO	
Informative	INFO	Information Noted
Informative	INFO	Information Noted
Informative	INFO	Information Noted
Informative	INFO	Information Noted
Informative	INFO	Information Noted

Compliant	2	ECO was appointed and report are submitted as required
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Not Applicable / Not Audited	NA	project not yet completed
Compliant	2	complaint
Compliant	2	reports are kept abd are made available onsite
Compliant	2	the department was notified
Not Applicable / Not Audited	NA	noted
Not Applicable / Not Audited	NA	Noted
Compliant	2	complaint
Informative	INFO	Noted
Compliant	2	complaint
Compliant	2	complatnt
Compliant	2	recycling now done onsite
Compliant	2	EA and Empr copies are available onsite
Informative	INFO	noted

46

Max Score	92	
Compliant	24	48
Partial Compliance	0	0
Non-Compliant	0	0
Work in Progress	1	
INFO	18	
NA	3	

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Max Auditable Score	48
Overall Percentage	100%

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Virginia Switching station
Conditions
The proposed 132kV Switching Station located on the Farm Blomskraal 216, Ventersburg Road, Portion 0 (Remainder) within Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province, is approved as per the geographic coordinates in the table above.
Authorisation of the activity is subject to the conditions contained in this Environmental Authorisation, which form part of the Environmental Authorisation and are binding on the holder of the authorisation.
The holder of the authorisation is responsible for ensuring compliance with the conditions contained in this Environmental Authorisation. This includes any person acting on the holder's behalf, including but not limited to, an agent, servant, contractor, sub-contractor, employee, consultant or person rendering a service to the holder of the authorisation.
The activities authorised must only be carried out at the property as described above.
Any changes to, or deviations from, the project description set out in this Environmental Authorisation must be approved, in writing, by the Department before such changes or deviations may be effected. In assessing whether to grant such approval or not, the Department may request such information as it deems necessary to evaluate the significance and impacts of such changes or deviations and it may be necessary for the holder of the authorisation to apply for further Environmental Authorisation in terms of the regulations.
The holder of an Environmental Authorisation must apply for an amendment of the Environmental Authorisation with the Competent Authority for any alienation, transfer or change of ownership rights in the property on which the activity is to take place.
This activity must commence within a period of ten (10) years from the date of issue of this Environmental Authorisation. If commencement of the activity does not occur within that period, the authorisation lapses and a new application for Environmental Authorisation must be made in order for the activity to be undertaken.
Construction must be completed within five (05) years of the commencement of the activity on site.
Commencement with one activity listed in terms of this Environmental Authorisation constitutes commencement of all authorised activities.
The holder of the authorisation must notify every registered interested and affected party, in writing and within 14 (fourteen) calendar days of the date of this Environmental Authorisation, of the decision to authorise the activity.
specify the date on which the authorisation was issued;
inform the interested and affected party of the appeal procedure provided for in the National Appeal Regulations, 2014:
Advise the interested and affected party that a copy of the authorisation will be furnished on request;
and
Give the reasons of the Competent Authority for the decision.
The authorised activity must not commence until the period for the submission of appeals has lapsed as per the National Appeal Regulations, 2014, and no appeal has been lodged against the decision. In terms of Section 43(7), an appeal under Section 43 of the National Environmental Management Act, Act No. 107 of 1998, as amended will suspend the Environmental Authorisation or any provision or condition attached thereto. In the instance where an appeal is lodged you may not commence with the activity until such time that the appeal has been finalised.
The site layout plans attached as Appendix 8 - Maps dated July 2023 is approved.
The Generic Environmental Management Programme (EMPr) dated January 2022 for the and expansion of substation for the transmission and distribution of electricity submitted as part of the EIAR dated 01 February 2022 is approved and must be implemented and adhered to.
The Generic Environmental Management Programme (EMPr) dated January 2022 for the development and expansion of substation for the transmission and distribution of electricity must be implemented and strictly enforced during all phases of the project. It shall be seen as a dynamic document and shall be included in all contract documentation for all phases of the development when approved.
Changes to the Generic Environmental Management Programme (EMPr) dated January 2022 for the development and expansion of substation for the transmission and distribution of electricity must be submitted in accordance with the EIA Regulations applicable at the time.
The Department reserves the right to amend the approved Generic Environmental Management Programme (EMPr) dated January 2022 for the development and expansion of substation for the transmission and distribution of electricity should any impacts that were not anticipated or covered in the EIAR be discovered.
The Generic Environmental Management Programme (EMPr) dated January 2022 for the development and expansion of substation for the transmission and distribution of electricity must be updated where the findings of the environmental audit reports, contemplated in Condition 25 below, indicate insufficient mitigation of environmental impacts associated with the undertaking of the activity, or insufficient levels of compliance with the environmental authorisation or EMPr.
The updated Generic Environmental Management Programme (EMPr) for the development and expansion of substation for the transmission and distribution of electricity must contain recommendations to rectify the shortcomings identified in the environmental audit report.
The updated Generic Environmental Management Programme (EMPr) for the development and expansion of substation for the transmission and distribution of electricity must be submitted to the Department for approval together with the environmental audit report, as per Regulation 34 of the EIA Regulations, 2014 as amended. The updated EMPr must have been subjected to a public participation process, which process has been agreed to by the Department, prior to submission of the updated EMPr to the Department for approval.

In assessing whether to grant approval of a Generic Environmental Management Programme (EMPr) for the development and expansion of substation for the transmission and distribution of electricity which has been updated as a result of an audit, the Department will consider the processes prescribed in Regulation 35 of the EIA Regulations, 2014 as amended. Prior to approving an amended Generic Environmental Management Programme (EMPr) for the development and expansion of substation for the transmission and distribution of electricity, the Department may request such amendments to the Generic Environmental Management Programme (EMPr) for the development and expansion of substation for the transmission and distribution of electricity as it deems appropriate to ensure that the EMPr sufficiently provides for avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity.
The holder of the authorisation must apply for an amendment of a Generic Environmental Management Programme (EMPr) for the development and expansion of substation the transmission and distribution of electricity, if such amendment is required before an audit is required. The amendment process is prescribed in Regulation 37 of the EIA Regulations, 2014, as amended. The holder of the authorisation must request comments on the proposed amendments to the impact management outcomes of the EMPr or amendments to the closure objectives of the closure plan from potentially interested and affected parties, including the competent authority, by using any of the methods provided for in the Act for a period of at least 30 days.
The holder of the authorisation must appoint an experienced Environmental Control Officer (ECO) for the construction phase of the development that will have the responsibility to ensure that the mitigation/rehabilitation measures and recommendations referred to in this environmental authorisation are implemented and to ensure compliance with the provisions of the approved EMPr.
The ECO must be appointed before commencement of any authorised activities.
Once appointed, the name and contact details of the ECO must be submitted to the Director: Compliance Monitoring of the Department.
The ECO must keep record of all activities on site, problems identified, transgressions noted and a task schedule of tasks undertaken by the ECO.
The ECO must remain employed until all rehabilitation measures, as required for implementation due to construction damage, are completed and the site is ready for operation.
All documentation e.g. audit/monitoring/compliance reports and notifications, required to be submitted to the Department in terms of this environmental authorisation, must be submitted to the Director: Compliance Monitoring of the Department.
The holder of the environmental authorisation must, for the period during which the environmental authorisation and Generic Environmental Management Programme (EMPr) dated January 2022 for the development and expansion of substation for the transmission and distribution of electricity remain valid, ensure that project compliance with the conditions of the environmental authorisation and the EMPr are audited, and that the audit reports are submitted to the Director: Compliance Monitoring of the Department.
The frequency of auditing and of submission of the environmental audit reports must be as per the frequency indicated in the Generic Environmental Management Programme (EMPr) dated January 2022 for the development and expansion of substation for the transmission and distribution of electricity, considering the processes for such auditing as prescribed in Regulation 34 of the EIA Regulations, 2014 as amended.
The holder of the authorisation must, in addition, submit environmental audit reports to the Department within 30 days of completion of the construction phase (i.e. within 30 days of site handover) and a final environmental audit report within 30 days of completion of rehabilitation activities.
The environmental audit reports must be compiled in accordance with Appendix 7 of the EIA Regulations, 2014 as amended and must indicate the date of the audit, the name of the auditor and the outcome of the audit in terms of compliance with the environmental authorisation conditions as well as the requirements of the approved Generic Environmental Management Programme (EMPr) dated January 2022 for the development and expansion of substation for the transmission and distribution of electricity.
A written notification of commencement must be given to the Department no later than fourteen (14) days prior to the commencement of the activity. Commencement for the purposes of this condition includes site preparation. The notice must include a date on which it is anticipated that the activity will commence, as well as a reference number.
A written notification of operation must be given to the Department no later than fourteen (14) days prior to the commencement of the activity operational phase.
Should the activity ever cease or become redundant, the holder of the authorisation must undertake the required actions as prescribed by legislation at the time and comply with all relevant legal requirements administered by any relevant and Competent Authority at that time.
No activities must be allowed to encroach into a water resource without a water use authorisation being in place from the Department of Water and Sanitation.
The footprint of the development must be limited to the areas required for actual construction works and operational activities.
A pre-construction walk-through of the final development footprint must be undertaken in order to locate and identify Species of Conservation Concern that can be translocated.
Construction must include design measures that allow surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows. Drainage measures must promote the dissipation of storm water run-off.
Should any archaeological sites, artefacts, paleontological fossils or graves be exposed during construction work, work in the immediate vicinity of the find must be stopped, the SAHRA/PHRA must be informed, and the services of an accredited heritage professional obtained for an assessment of the heritage resources.
An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal where appropriate. Any solid waste must be disposed of at a landfill licensed in terms of Section 20 (b) of the National Environment Management Waste Act, 2008 (Act No.59 of 2008).

A copy of this Environmental Authorisation, the audit and compliance monitoring reports, and the approved EMPr, must be made available for inspection and copying-
at the site of the authorised activity.
to anyone on request; and
where the holder of the Environmental Authorisation has a website, on such publicly accessible website.
National government, provincial government, local authorities or committees appointed in terms of the conditions of this authorisation or any other public authority shall not be held responsible for any damages or losses suffered by the holder of the authorisation or his/her successor in title in any instance where construction or operation subsequent to construction be temporarily or permanently stopped for reasons of non-compliance by the holder of the authorisation with the conditions of authorisation as set out in this document or any other subsequent document emanating from these conditions of authorisation.

Informative	INFO	
Informative	INFO	
Compliant	2	ECO was appointed and reports are submitted as required
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Not Applicable / Not Audited	NA	project not completed yet
Compliant	2	compliant
Compliant	2	the department was notified of the commencement
Not Applicable / Not Audited	NA	project still on the construction phase
Not Applicable / Not Audited	NA	
Compliant	2	WULA was acquired for the project to undertake activities
Compliant	2	compliant
Compliant	2	pre-walk was done
Partially Compliant	1	water ponding was observed on access roads along the line.
Informative	INFO	noted
Compliant	2	recycling now be done onsite

Compliant	2	Documents are available onsite
Compliant	2	
Compliant	2	
Compliant	2	
Informative	INFO	Noted

49

MAX SCORE	98	
Compliant	25	50
Partial Compliance	1	1
Non-Compliant	0	0
Work in Progress	1	
INFO	19	
NA	3	
49		51
Max Auditable Score	52	
Overall Percentage	98%	

Project: Virginia Solar Plant
All staff must receive environmental awareness training prior to commencement of the activities;
The Contractor must allow for sufficient sessions to train all personnel with no more than 20 personnel attending each course;
Refresher environmental awareness training is available as and when required;
All staff are aware of the conditions and controls linked to the EA and within the EMPr and made aware of their individual roles and responsibilities in achieving compliance with the EA and EMPr;
The Contractor must erect and maintain information posters at key locations on site, and the posters must include the following information as a minimum: a) Safety notifications; and b) No littering.
Environmental awareness training must include as a minimum the following: a) Description of significant environmental impacts, actual or potential, related to their work activities. b) Mitigation measures to be implemented when carrying out specific activities. c) Emergency preparedness and response procedures. d) Emergency procedures. e) Procedures to be followed when working near or within sensitive areas. f) Wastewater management procedures. g) Water usage and conservation. h) Solid waste management procedures. a) Sanitation procedures. j) Fire prevention; and k) Disease prevention.
A record of all environmental awareness training courses undertaken as part of the EMPr must be available;
Educate workers on the dangers of open and/or unattended fires;
A staff attendance registers of all staff to have received environmental awareness training must be available.
Course material must be available and presented in appropriate languages that all staff can understand.
A method statement must be provided by the contractor prior to any onsite activity that includes the layout of the construction camp in the form of a plan showing the location of key infrastructure and services (where applicable), including but not limited to offices, overnight vehicle parking areas, stores, the workshop, stockpile and lay down areas, hazardous materials storage areas (including fuels), the batching plant (if one is located at the construction camp), designated access routes, equipment cleaning areas and the placement of staff accommodation, cooking and ablution facilities, waste and wastewater management;
Location of construction camps must be within approved area to ensure that the site does not impact on sensitive areas identified in the environmental assessment or site walk through;
Sites must be located where possible on previously disturbed areas;
The camp must be fenced in accordance with Section 5.5: Fencing and gate installation; and
The use of existing accommodation for contractor staff, where possible, is encouraged.
Identification of access restricted areas is to be informed by the environmental assessment, site walk through, and any additional areas identified during development;
Erect, demarcate and maintain a temporary barrier with clear signage around the perimeter of any access restricted area, colour coding could be used if appropriate; and
Unauthorised access and development related activity inside access restricted areas is prohibited.
An access agreement must be formalized and signed by the DPM, Contractor and landowner before commencing with the activities;
All private roads used for access to the servitude must be maintained and upon completion of the works, be left in at least the original condition
All contractors must be made aware of all these access routes.
Any access route deviation from that in the written agreement must be closed and re-vegetated immediately, at the contractor's expense;
Maximum use of both existing servitudes and existing roads must be made to minimise further disturbance through the development of new roads;
In circumstances where private roads must be used, the condition of the said roads must be recorded in accordance with section 4.9: photographic record; prior to use and the condition thereof agreed by the landowner, the DPM, and the contractor;
Access roads in flattish areas must follow fence lines and tree belts to avoid fragmentation of vegetated areas or croplands
Access roads must only be developed on pre-planned and approved roads.
Use existing gates provided to gain access to all parts of the area authorised for development, where possible;
Existing and new gates to be recorded and documented in accordance with section 4.9: photographic record;
All gates must be fitted with locks and be kept locked at all times during the development phase, unless otherwise agreed with the landowner;
At points where the line crosses an existing fence in which there is no suitable gate within the extent of the line servitude, on the instruction of the DPM, a gate must be installed at the approval of the landowner;
Care must be taken that the gates must be so erected that there is a gap of no more than 100 mm between the bottom of the gate and the ground;
Where gates are installed in jackal proof fencing, a suitable reinforced concrete still must be provided beneath the gate;
Original tension must be maintained in the fence wires;
All gates installed in electrified fencing must be reelectrified;
All demarcation fencing and barriers must be maintained in good working order for the duration of the development activities;
Fencing must be erected around the camp, batching plants, hazardous storage areas, and all designated access restricted areas, where applicable;

Any temporary fencing to restrict the movement of livestock must only be erected with the permission of the land owner.
All fencing must be developed of high-quality material bearing the SABS mark;
The use of razor wire as fencing must be avoided as far as possible;
Fenced areas with gate access must remain locked after hours, during weekends and on holidays if staff is away from site. Site security will be required at all times;
On completion of the development phase all temporary fences are to be removed;
The contractor must ensure that all fence uprights are appropriately removed, ensuring that no uprights are cut at ground level but rather removed completely.
All abstraction points or bore holes must be registered with the DWS and suitable water meters installed to ensure that the abstracted volumes are measured on a daily basis;
The Contractor must ensure the following: a. The vehicle abstracting water from a river does not enter or cross it and does not operate from within the river. b. No damage occurs to the river bed or banks and that the abstraction of water does not entail stream diversion activities; and c. All reasonable measures to limit pollution or sedimentation of the downstream watercourse are implemented.
Ensure water conservation is being practiced by: a. Minimising water use during cleaning of equipment. b. Undertaking regular audits of water systems; and c. Including a discussion on water usage and conservation during environmental awareness training. d. The use of grey water is encouraged.
Runoff from the cement/ concrete batching areas must be strictly controlled, and contaminated water must be collected, stored and either treated or disposed of off-site, at a location approved by the project manager;
All spillage of oil onto concrete surfaces must be controlled by the use of an approved absorbent material and the used absorbent material disposed of at an appropriate waste disposal facility;
Natural stormwater runoff not contaminated during the development and clean water can be discharged directly to watercourses and water bodies, subject to the Project Manager's approval and support by the ECO, ESCO;
All measures regarding waste management must be undertaken using an integrated waste management approach;
Sufficient, covered waste collection bins (scavenger and weatherproof) must be provided;
A suitably positioned and clearly demarcated waste collection site must be identified and provided
The waste collection site must be maintained in a clean and orderly manner;
Waste must be segregated into separate bins and clearly marked for each waste type for recycling and safe disposal;
Staff must be trained in waste segregation;
Bins must be emptied regularly;
General waste produced onsite must be disposed of at registered waste disposal sites/ recycling company;
Hazardous waste must be disposed of at a registered waste disposal site;
Certificates of safe disposal for general, hazardous, and recycled waste must be maintained.
All watercourses must be protected from direct or indirect spills of pollutants such as solid waste, sewage, cement, oils, fuels, chemicals, aggregate tailings, wash and contaminated water or organic material resulting from the Contractor's activities;
In the event of a spill, prompt action must be taken to clear the polluted or affected areas
Where possible, no development equipment must traverse any seasonal or permanent wetland
Development of permanent watercourse crossing must only be undertaken where no alternative access to tower position is available;
There must not be any impact on the long-term morphological dynamics of watercourses;
Upgrading of Existing crossing points must be favoured over the creation of new crossings (including temporary access)"
When working in or near any watercourse or estuary, the following environmental controls and consideration must be taken: a) Water levels during the period of construction. No altering of the bed, banks, course, or characteristics of a watercourse b) During the execution of the works, appropriate measures to prevent pollution and contamination of the riparian environment must be implemented e.g., including ensuring that construction equipment is well maintained. c) Where earthwork is being undertaken in close proximity to any watercourse, slopes must be stabilised using suitable materials, i.e., sandbags or geotextile fabric, to prevent sand and rock from entering the channel; and d) Appropriate rehabilitation and re-vegetation measures for the watercourse banks must be implemented timeously. In this regard, the banks should be appropriately and incrementally stabilised as soon as development allows.
Indigenous vegetation which does not interfere with the development must be left undisturbed
Protected or endangered species may occur on or near the development site. Special care should be taken not to damage such species;
Search, rescue, and replanting of all protected and endangered species likely to be damaged during project development must be identified by the relevant specialist and completed prior to any development or clearing;
Environmental Officer (EO) to provide supervision and oversight of vegetation clearing activities within sensitive areas such as near the drainage lines.
Permits for removal must be obtained from the relevant CA prior to the cutting or clearing of the affected species, and they must be filed;
The Environmental Audit Report must confirm that all identified species have been rescued and replanted and that the location of replanting is compliant with conditions of approvals;
Trees felled due to construction must be documented and form part of the Environmental Audit Report;
Rivers and watercourses must be kept clear of felled trees, vegetation cuttings and debris;
Only a registered pest control operator may apply herbicides on a commercial basis and commercial application must be carried out under the supervision of a registered pest control operator, supervision of a registered pest control operator or is appropriately trained;

A daily register must be kept of all relevant details of herbicide usage;
All protected species and sensitive vegetation not removed must be clearly marked and such areas fenced off in accordance with Section 5.3: Access restricted areas.
Vegetation that does not grow high enough to cause interference with overhead transmission and distribution infrastructures, or cause a fire hazard to any plantation, must not be cut or trimmed unless it is growing in the road access area, and then only at the discretion of the Project Manager;
Where clearing for access purposes is essential, the maximum width to be cleared within the servitude must be in accordance to distance as agreed between the landowner and the EA holder;
Alien invasive vegetation must be removed according to a plan (in line with relevant municipal and provincial procedures, guidelines and recommendations) and disposed of at a recognised waste disposal facility;
Vegetation must be trimmed where it is likely to intrude on the minimum vegetation clearance distance (MVCD) or will intrude on this distance before the next scheduled clearance. MVCD is determined from SANS 10280;
Debris resulting from clearing and pruning must be disposed of at a recognised waste disposal facility, unless the landowners wish to retain the cut vegetation;
In the case of the development of new overhead transmission and distribution infrastructures, a one metre "trace-line" must be cut through the vegetation for stringing purposes only and no vehicle access must be cleared along the "trace-line". Alternative methods of stringing that limit impact to the environment must always be considered.
No interference with livestock must occur without the landowner's written consent and with the landowner or a person representing the landowner being present;
The breeding sites of raptors and other wild birds' species must be taken into consideration during the planning of the development programme;
Nesting sites on existing parallel lines must be documented;
Special recommendations of the avian specialist must be adhered to at all times to prevent unnecessary disturbance of birds;
Bird guards and diverters must be installed on the newline as per the recommendations of the specialist;
No poaching must be tolerated under any circumstances. All animal dens in close proximity to the works areas must be marked as Access restricted areas;
No deliberate or intentional killing of fauna is allowed;
In areas where snakes are abundant, snake deterrents are to be deployed on the pylons to prevent snakes climbing up, being electrocuted, and causing power outages; and
No Threatened or Protected species (ToPs) and/or protected fauna as listed according NEMBA (Act No. 10 of 2004), and relevant provincial ordinances may be removed and/or relocated without appropriate authorisations/permits.
Identify, demarcate, and prevent impact to all known sensitive heritage features on site in accordance with the No-Go procedure in Section 5.3: Access restricted areas;
Carry out general monitoring of excavations for potential fossils, artefacts, and material of heritage importance;
All work must cease immediately, if any human remains and/or other archaeological, palaeontological, and historical material are uncovered. Such material, if exposed, must be reported to the nearest museum, archaeologist/ palaeontologist (or the South African Police Services), so that a systematic and professional investigation can be undertaken. Sufficient time must be allowed to remove/collect such material before development recommences.
Identify fire hazards, demarcate, and restrict public access to these areas as well as notify the local authority of any potential threats e.g., large brush stockpiles, fuels etc.;
All unattended open excavations must be adequately fenced or demarcated;
Adequate protective measures must be implemented to prevent unauthorised access to and climbing of partly constructed infrastructure and protective scaffolding;
Ensure structures vulnerable to high winds are secured;
Maintain an incidents and complaints register in which all incidents or complaints involving the public are logged.
Mobile chemical toilets are installed onsite if no other ablution facilities are available;
The use of ablution facilities and or mobile toilets must be used at all times and no indiscriminate use of the veld for the purposes of ablutions must be permitted under any circumstances;
Where mobile chemical toilets are required, the following must be ensured: a) Toilets are located no closer than 100 m to any watercourse or water body. b) Toilets are secured to the ground to prevent them from toppling due to wind or any other cause) No spillage occurs when the toilets are cleaned or emptied, and the contents are managed in accordance with the EMPPr. d) Toilets have an external closing mechanism and are closed and secured from the outside when not in use to prevent toilet paper from being blown out. e) Toilets are emptied before long weekends and workers holidays and must be locked after working hours. f) Toilets are serviced regularly, and the ECO, ESCO must inspect toilets to ensure compliance to health standards;
A copy of the waste disposal certificates must be maintained.
Undertake environmentally friendly pest control in the camp area;
Ensure that the workforce is sensitised to the effects of sexually transmitted diseases, especially HIV/ AIDS;
The Contractor must ensure that information posters on HIV/ AIDS are displayed in the Contractor Camp area;
Information and education relating to sexually transmitted diseases to be made available to both construction workers and local community, where applicable;
Free condoms must be made available to all staff on site at central points;
Medical support must be made available;
Provide access to Voluntary HIV Testing and Counselling Services.

Compile an Emergency Response Action Plan (ERAP) prior to the commencement of the proposed project;
The Emergency Plan must deal with accidents, potential spillages, and fires in line with relevant legislation;
All staff must be made aware of emergency procedures as part of environmental awareness training;
The relevant local authority must be made aware of a fire as soon as it starts;
In the event of emergency necessary mitigation measures to contain the spill or leak must be implemented (see Hazardous Substances section 5.17).
The use and storage of hazardous substances to be minimised and non-hazardous and non-toxic alternatives substituted where possible;
All hazardous substances must be stored in suitable containers as defined in the Method Statement;
Containers must be clearly marked to indicate contents, quantities, and safety requirements;
All storage areas must be bunded. The bunded area must be of sufficient capacity to contain a spill / leak from the stored containers;
Bunded areas to be suitably lined with a SABS approved liner;
An Alphabetical Hazardous Chemical Substance (HCS) control sheet must be drawn up and kept up to date on a continuous basis;
All hazardous chemicals that will be used on site must have Material Safety Data Sheets (MSDS);
All employees working with HCS must be trained in the safe use of the substance and according to the safety data sheet;
Employees handling hazardous substances / materials must be aware of the potential impacts and follow appropriate safety measures. Appropriate personal protective equipment must be made available;
The Contractor must ensure that diesel and other liquid fuel, oil and hydraulic fluid is stored in appropriate storage tanks or in bowsters
The tanks/ bowsters must be situated on a smooth impermeable surface (concrete) with a permanent bund. The impermeable lining must extend to the crest of the bund and the volume inside the bund must be 130% of the total capacity of all the storage tanks/ bowsters (110% statutory requirement plus an allowance for rainfall);
The floor of the bund must be sloped, draining to an oil separator;
Provision must be made for refuelling at the storage area by protecting the soil with an impermeable groundcover. Where dispensing equipment is used, a drip tray must be used to ensure small spills are contained;
All empty externally dirty drums must be stored on a drip tray or within a bunded area;
No unauthorised access into the hazardous substance's storage areas must be permitted;
No smoking must be allowed within the vicinity of the hazardous storage areas;
Adequate fire-fighting equipment must be made available at all hazardous storage areas;
Where refuelling away from the dedicated refuelling station is required, a mobile refuelling unit must be used. Appropriate ground protection such as drip trays must be used;
An appropriately sized spill kit kept onsite relevant to the scale of the activity/s involving the use of hazardous substance must be available at all times;
The responsible operator must have the required training to make use of the spill kit in emergency situations;
An appropriate number of spill kits must be available and must be located in all areas where activities are being undertaken;
In the event of a spill, contaminated soil must be collected in containers and stored in a central location and disposed of according to the National Environmental Management: Waste Act 59 of 2008. Refer to Section 5.7 for procedures concerning storm and waste water management and 5.8 for solid and hazardous waste management.
Where possible and practical all maintenance of vehicles and equipment must take place in the workshop area;
During servicing of vehicles or equipment, especially where emergency repairs are affected outside the workshop area, a suitable drip tray must be used to prevent spills onto the soil. The relevant local authority must be made aware of a fire as soon as it starts;
Leaking equipment must be repaired immediately or be removed from site to facilitate repair;
Workshop areas must be monitored for oil and fuel spills;
Appropriately sized spill kit kept onsite relevant to the scale of the activity taking place must be available;
The workshop area must have a bunded concrete slab that is sloped to facilitate runoff into a collection sump or suitable oil / water separator where maintenance work on vehicles and equipment can be performed;
Water drainage from the workshop must be contained and managed in accordance Section 5.7: Storm and waste water management.
Concrete mixing must be carried out on an impermeable surface;
Batching plants areas must be fitted with a containment facility for the collection of cement laden water.
Dirty water from the batching plant must be contained to prevent soil and groundwater contamination
Bagged cement must be stored in an appropriate facility and at least 10 m away from any water courses, gullies, and drains;
A washout facility must be provided for washing of concrete associated equipment. Water used for washing must be restricted;
Hardened concrete from the washout facility or concrete mixer can either be reused or disposed of at an appropriate licensed disposal facility;
Empty cement bags must be secured with adequate binding material if these will be temporarily stored on site;
Sand and aggregates containing cement must be kept damp to prevent the generation of dust (Refer to Section 5.20: Dust emissions)

Any excess sand, stone and cement must be removed or reused from site on completion of the construction period and disposed at a registered disposal facility;
Temporary fencing must be erected around batching plants in accordance with Section 5.5: Fencing and gate installation.
Take all reasonable measures to minimise the generation of dust as a result of project development activities to the satisfaction of the ECO, ESCO;
Removal of vegetation must be avoided until such time as soil stripping is required and similarly exposed surfaces must be re-vegetated or stabilised as soon as is practically possible;
Excavation, handling, and transport of erodible materials must be avoided under high wind conditions or when a visible dust plume is present;
During high wind conditions, the ECO, ESCO must evaluate the situation and make recommendations as to whether dust-damping measures are adequate, or whether working will cease altogether until the wind speed drops to an acceptable level;
Vehicle speeds must not exceed 30 km/h along dust roads or 20 km/h when traversing unconsolidated and no vegetated areas:
Straw stabilisation must be applied at a rate of one bale/10 m ² and harrowed into the top 100 mm of top material, for all completed earthworks:
For significant areas of excavation or exposed ground, dust suppression measures must be used to minimise the spread of dust.
Any blasting activity must be conducted by a suitably licensed blasting contractor; and
Notification of surrounding landowners, emergency services site personnel of blasting activity 24 hours prior to such activity taking place on Site.
The Contractor must keep noise level within acceptable limits, Restrict the use of sound amplification equipment for communication and emergency only;
All vehicles and machinery must be fitted with appropriate silencing technology and must be properly maintained;
Any complaints received by the Contractor regarding noise must be recorded and communicated. Where possible or applicable, provide transport to and from the site on a daily basis for construction workers;
Develop a Code of Conduct for the construction phase in terms of behaviour of construction staff. Operating hours as determined by the environmental authorisation are adhered to during the development phase. Where not defined, it must be ensured that development activities must still meet the impact management outcome related to noise management.
Designate smoking areas where the fire hazard could be regarded as insignificant;
Firefighting equipment must be available on all vehicles located on site
The local Fire Protection Agency (FPA) must be informed of construction activities;
Contact numbers for the FPA and emergency services must be communicated in environmental awareness training and displayed at a central location on site;
Two-way swap of contact details between ECO, ESCO and FPA.
All material that is excavated during the project development phase (either during piling (if required) or earthworks) must be stored appropriately on site in order to minimise impacts to watercourses and water bodies;
All stockpiled material must be maintained and kept clear of weeds and alien vegetation growth by undertaking regular weeding and control methods;
Topsoil stockpiles must not exceed 2 m in height:
During periods of strong winds and heavy rain, the stockpiles must be covered with appropriate material (e.g., cloth, tarpaulin etc.);
Where possible, sandbags (or similar) must be placed at the bases of the stockpiled material in order to prevent erosion of the material.
No vegetation clearing must occur during survey and pegging operations;
No new access roads must be developed to facilitate access for survey and pegging purposes;
Project manager, botanical specialist and contractor to agree on final tower positions based on survey within assessed and approved areas;
The surveyor is to demarcate (peg) access roads/tracks in consultation with ECO. No deviations will be allowed without the prior written consent from the ECO.
All excess spoil generated during foundation excavation must be disposed of in an appropriate manner and at a licensed landfill site, if not used for backfilling purposes;
Spoil can however be used for landscaping purposes and must be covered with a layer of 150 mm topsoil for rehabilitation purposes;
Management of equipment for excavation purposes must be undertaken in accordance with Section 5.18: Workshop, equipment maintenance and storage; and
Residual cement must be disposed of in accordance with Section 5.8: Solid and hazardous waste management.
Hazardous substances spills from equipment must be managed in accordance with Section 5.17: Hazardous substances.
Prior to erection, assembled towers and tower sections must be stored on elevated surfaces (suggest wooden blocks) to minimise damage to the underlying vegetation;
In sensitive areas, tower assembly must take place off-site or away from sensitive positions;
The crane used for tower assembly must be operated in a manner which minimises impact to the environment;
The number of crane trips to each site must be minimised;

Wheeled cranes must be utilised in preference to tracked cranes. However, Rocky terrain may require tracked cranes in the project site.
Consideration must be given to erecting towers by helicopter or by hand where it is warranted to limit the extent of environmental impact;
Access to tower positions to be undertaken in accordance with access requirements specified in Section 5.4: Access Roads
Vegetation clearance to be undertaken in accordance with general vegetation clearance requirements specified in Section 5.10: Vegetation clearing;
No levelling at tower sites must be permitted unless approved by the Development Project Manager or Developer Site Supervisor;
Topsoil must be removed separately from subsoil material and stored for later use during rehabilitation of such tower sites;
Topsoil must be stored in heaps not higher than 2m to prevent destruction of the seed bank within the topsoil;
Excavated slopes must be no greater than 1:3, but where this is unavoidable, appropriate measures must be undertaken to stabilise the slopes;
Fly rock from blasting activity must be minimised and any pieces greater than 150 mm falling beyond the Working Area, must be collected and removed;
Only existing disturbed areas are utilised as spoil areas;
Drainage is provided to control groundwater exit gradient with the spill areas such that migration off site is kept to a minimum;
Surface water runoff is appropriately channelled through or around spoil areas;
The surface of the spoil is appropriately rehabilitated in accordance with the requirements specified in Section 5.29: Landscaping and rehabilitation;
The retained topsoil must be spread evenly over areas to be rehabilitated and suitably compacted to effect revegetation of such areas to prevent erosion as soon as construction activities on the site is complete. Spreading of topsoil must not be undertaken, when possible, at the beginning of the dry season.
Where possible, previously disturbed areas must be used for the siting of winch and tensioner stations. In all other instances, the siting of the winch and tensioner must avoid
Access restricted areas and other sensitive areas;
The winch and tensioner station must be equipped with drip trays in order to contain any fuel, hydraulic fuel or oil spills and leaks;
Refuelling of the winch and tensioner stations must be undertaken in accordance with Section 5.17: Hazardous substances;
In the case of the development of overhead transmission and distribution infrastructure, a one metre "trace-line" may be cut through the vegetation for stringing purposes only and no vehicle access must be cleared along "trace-lines". Vegetation clearing must be undertaken by hand, using chainsaws and handheld implements, with vegetation being cut off at ground level. No tracked or wheeled mechanised equipment must be used;
Alternative methods of stringing which limit impact to the environment must always be considered e.g. by hand or by using a helicopter;
Where the stringing operation crosses a public or private road or railway line, the necessary scaffolding/ protection measures must be installed to facilitate access. If, for any reason, such access has to be closed for any period(s) during development, the persons affected must be given reasonable notice, in writing;
No services (electrical distribution lines, telephone lines, roads, railways lines, pipelines fences etc.) must be damaged because of stringing operations. Where disruption to services is unavoidable, persons affected must be given reasonable notice, in writing;
Where stringing operations cross cultivated land, damage to crops is restricted to the minimum required to conduct stringing operations, and reasonable notice (10 work days minimum), in writing, must be provided to the landowner;
Necessary scaffolding protection measures must be installed to prevent damage to the structures supporting certain high value agricultural areas such as vineyards, orchards, nurseries.
Develop and implement communication strategies to facilitate public participation;
Develop and implement a collaborative and constructive approach to conflict resolution as part of the external stakeholder engagement process;
Sustain continuous communication and liaison with neighbouring owners and residents
Create work and training opportunities for local stakeholders; and
Where feasible, no workers, with the exception of security personnel, must be permitted to stay over-night on the site. This would reduce the risk to local farmers.
Bunds must be emptied (where applicable) and need to be undertaken in accordance with the impact management actions included in sections 5.17: Hazardous substances and 5.18: Workshop, equipment maintenance and storage;
Hazardous storage areas must be well ventilated;
Fire extinguishers must be serviced and accessible. Service records to be filed and audited at last service;
Emergency and contact details displayed must be displayed;
Security personnel must be briefed and have the facilities to contact or be contacted by relevant management and emergency personnel;
Night hazards such as reflectors, lighting, traffic signage etc. must have been checked;
Fire hazards identified and the local authority must have been notified of any potential threats e.g., large brush stockpiles, fuels etc.;
Structures vulnerable to high winds must be secured;
Wind and dust mitigation must be implemented;
Cement and materials stores must have been secured;
Toilets must have been emptied and secured;

Refuse bins must have been emptied and secured;
Drip trays must have been emptied and secured.
All areas disturbed by construction activities must be subject to landscaping and rehabilitation; All spoil and waste must be disposed of to a registered waste site;
All slopes must be assessed for contouring, and to contour only when the need is identified in accordance with the Conservation of Agricultural Resources Act, No 43 of 1983
All slopes must be assessed for terracing, and to terrace only when the need is identified in accordance with the Conservation of Agricultural Resources Act, No 43 of 1983;
Berms that have been created must have a slope of 1:4 and be replanted with indigenous species and grasses that approximates the original condition;
Where new access roads have crossed cultivated farmlands, that lands must be rehabilitated by ripping which must be agreed to by the holder of the EA and the landowners;
Rehabilitation of access roads inside of farmland
Indigenous species must be used for with species and/grasses to where it compliments or approximates the original condition;
Stockpiled topsoil must be used for rehabilitation (refer to Section 5.24: Stockpiling and stockpiled areas);
Stockpiled topsoil must be evenly spread so as to facilitate seeding and minimise loss of soil due to erosion;
Before placing topsoil, all visible weeds from the placement area and from the topsoil must be removed
Subsoil must be ripped before topsoil is placed;
The rehabilitation must be timed so that rehabilitation can take place at the optimal time for vegetation establishment;
Where impacted through construction related activity, all sloped areas must be stabilised to ensure proper rehabilitation is effected and erosion is controlled;
Sloped areas stabilised using design structures or vegetation as specified in the design to prevent erosion of embankments. The contract design specifications must be adhered to and implemented strictly;
Spoil can be used for backfilling or landscaping as long as it is covered by a minimum of 150 mm of topsoil.
Where required, re-vegetation including hydro-seeding can be enhanced using a vegetation seed mixture as described below. A mixture of seed can be used provided the mixture is carefully selected to ensure the following: a) Annual and perennial plants are chosen. b) Pioneer species are included. c) Species chosen must be indigenous to the area with the seeds used coming from the area. d) Root systems must have a binding effect on the soil. e) The final product must not cause an ecological imbalance in the area
Construction Activities must be restricted to the powerline servitude and pylon positions, as per condition 33 of the Environmental Authorisation (14/12/16/3/3/1/2444/AM1, 26 June 2023).
The removal of indigenous trees and shrubs should be kept to a minimum. Where protected trees will need to be cleared or pruned, permits should be obtained from the relevant authority. Trim, rather than felling of woody species along the edges of the development site where possible.
A two-track service road will follow the OHPL route and run adjacent and in some areas under the OHLP within the approved servitude. The road must not transgress areas outside of the servitude, and must not transgress sensitive areas unless authorised by the ECO /ESCO.
Peripheral impacts around the development corridors on the surrounding vegetation of the area should be avoided and a monitoring programme should be implemented to ensure the impacts are kept to a minimum.
All vehicles and equipment on site must be restricted to the designated routes and roads and must not enter, encroach on or impinge into sensitive habitats, unless authorised by the ECO/ESCO.
The ECO should advise the construction team in all relevant matters to ensure minimum destruction and damage to the environment. The ECO should enforce any measures that he/she deem necessary. Regular environmental training should be provided to construction workers to ensure the protection of the habitat, fauna and flora and their sensitivity to conservation
Placement of pylons should be outside sensitive vegetation units, outcrops and drainage channel in accordance with Condition 35 of the Environmental Authorisation (14/12/16/3/3/1/2444/AM1, 26 June 2023).
Soil should be sampled and analysed prior to replacement during rehabilitation. If necessary, and under advisement from a suitably qualified restoration ecologist, supplemental fertilisation may be necessary.
Use existing facilities (e.g., impacted areas) to the extent possible to minimize the amount of new disturbance.
Construction activities must remain within defined construction areas. No construction / disturbance will occur outside these areas.
Where holes for poles pose a risk to animal safety, they should be adequately cordoned off to prevent animals falling in and getting trapped and/or injured. This could be prevented by the constant excavating and backfilling during planting of the poles along the lines.
Poisons for the control of problem animals (rats, mice or other vermin) should only be used after approval from an ecologist.
Limit pesticide use to non-persistent, immobile pesticides and apply in accordance with label and application permit directions and stipulations for terrestrial and aquatic applications, and in accordance with the Ecologist requirements.
The taller (>3m) indigenous trees should be protected as far as possible and be incorporated into the proposed development. The removal of large dead trees is also not advised as these trees also provide smaller habitats for the mentioned bat species as well as rodents.
A monitoring programme needs to be implemented by a specialist to monitoring:
1. If any rare faunal species (page 74 of the Terrestrial Specialist report –August 2021) are confirmed on the property.
2. The impact of construction and the development on the fauna (species carcass counting for example)
Do not feed any wild animals on site.

An Alien Invasive Management Plan must be implemented for the site. Please see the Virginia 1, 2 and 3 PVSEF EMPr Alien Invasive Management Plans which can be incorporated onto the OHPL. In addition, weeds and invader plants will be controlled in the manner prescribed for that category by the Conservation of Agricultural Resources Act (CARA) or in terms of Working for Water guidelines.
Manage materials brought onto site. Inspect the materials for seeds of noxious plants and take steps taken to eradicate these before transport to the site.
Rehabilitate disturbed areas as quickly as possible to reduce the area where invasive species would be at a strong advantage and most easily able to establish.
Protect sloping areas and drainage channel banks that are susceptible to erosion and ensure that there is no undue soil erosion resultant from activities within and adjacent to the construction camp and Work Areas.
Placement of pylons should be outside sensitive soil types and drainage channels.
An Integrated waste management approach, as per Condition 37 of the EA (14/12/16/3/3/1/2444/AM1, 26 June 2023) must be implemented that is based on waste minimization and must incorporate reduction, recycling, re-use and disposal where appropriate. Any solid waste must be disposed of at a landfill licensed in terms of Section 20 (b) of the National Environmental Management Waste Act (Act. No 59 of 2008)
Ensure that all hazardous storage containers and storage areas comply with the relevant SABS standards to prevent leakage.
No dumping of waste should take place within the wetland / riparian zone. If any spills occur, they should be immediately cleaned up.
Implement standard dust control measures, including periodic spraying with non-potable water (frequency will depend on many factors including weather conditions, soil composition and traffic intensity and must thus be adapted on an on-going basis) and chemical dust suppressants of construction areas and access roads, and ensure that these are continuously monitored to ensure effective implementation.
Appropriate sanitary facilities must be provided for the duration of the proposed development and all waste removed to an appropriate waste facility.
A speed limit (preferably 40 km/hour) should be enforced on dirt roads to prevent dust from moving into adjacent freshwater watercourses.
Vehicle traffic should not be allowed on the rehabilitated areas, except on allocated roads, must not be allowed. It will have a negative impact due to the dispersive/compaction characteristics of soils and its implications on the long term. The indiscriminate use of machinery within the in-stream and riparian habitat will lead to compaction of soils and vegetation and must therefore be strictly controlled.
Perform scheduled maintenance to be prepared for storms. Ensure that culverts have their maximum capacity, ditches are cleaned, and that channels are free of debris and brush than can plug structures
Maintain proper firebreaks around entire development footprint.
Educate construction workers regarding risks and correct disposal of cigarettes on site
Travelling at night should be avoided or limited as much as possible.
As per Condition 35 of the EA (DFFE Ref.: 14/12/16/3/3/1/2444/AM1, dated 26 June 2023), The proposed powerline must avoid sensitive areas such as drainage areas, while also allowing corridors of indigenous grassland and outcrops on areas outside the development footprint to be preserved.
Construction within the 32 m regulatory zone should be avoided where reasonably practicable. Where possible taking into consideration associated engineering constraints, the OHPL must span all freshwater ecosystems including the endorheic depression wetlands. Where engineering designs do not allow for this, the mitigation measures indicated in this EMPr must be adhered to reduce all impacts to the freshwater ecosystems and to prevent sediment changes to the channels.
Clearing of vegetation at the crossings for the powerline corridors should be scheduled for the drier winter months and limited to areas immediately needed for construction.
Minimize soil exposure around the Solar PV Modules. Re-vegetate exposed areas surrounding the powerline development and allow a sufficient buffer between the cropland development to prevent sedimentation into the wetlands / rivers.

The location where the powerline crosses the drainage channels should be the least sensitive area. The site should be indicated by an ecologist after consultation by the engineers. The following mitigation measures and management actions should be taken to minimize potential impacts of the line crossing drainage channels: - Avoid power line locations in areas of high natural hazard risk, such as landslides, rock fall areas, steep slopes (over 60-70%), wet areas, saturated soils, etc. - Avoid or minimize construction in narrow canyon bottoms or on flood plains of rivers that will inevitably be inundated during major storm events. - Minimize changes to natural drainage patterns and crossings to drainages. - Scheduled maintenance to be prepared for storms. Insure that culverts have their maximum capacity, ditches are cleaned, and that channels are free of debris and brush than can plug structures. - Keep cut and fill slopes as flat as possible and well covered (stabilized) with vegetation to minimize slumping as well as minimize surface erosion. as possible and well covered (stabilized) with vegetation to minimize slumping as well as minimize surface erosion. - Use deep-rooted vegetation for biotechnical stabilization on slopes. Use a mixture of good ground cover plus deep-rooted vegetative species, preferably native species, to minimize deep-seated mass instability as well as offer surface erosion control protection. - Locate the power line on narrow sections of rivers and in areas of bedrock where possible. Avoid fine, deep alluvial deposits (of fine sand and silt) that are scour susceptible and problematic which otherwise require costly foundations. - Ensure that structural designs for the power line crossing the drainage channels include appropriate design criteria and have good foundations to prevent failures during floods. - Place retaining structures, foundations, and slope shallow colluvial soil or on loose fill material. stabilization measures into bedrock or firm, in-place material with good bearing capacity to minimize undermining, rather than placing these structures on.
Demarcate all riparian boundaries with pegs and danger tape.
Edge effects of pre-construction and construction activities, including erosion, sedimentation and alien/weed control, need to be strictly managed in wetland areas as well as their associated buffer zones.
The following general rehabilitation measures should be implemented in the disturbed riparian zone, where reasonably practicable: - All disturbed surface areas will be re-shaped to resemble the surrounding natural topography. Surfaces will be ripped / scarified, and re-vegetated with indigenous grass species. - Implement concurrent rehabilitation processes to limit degradation of soil biota. - Terrestrial invasive removal programs must be maintained throughout the proposed development as well as in the aftercare and maintenance phases.
Vegetation and soil should be retained in position for as long as possible and should only be removed immediately ahead of construction/earthworks in any specific area. Vegetation (grass and small shrubs) should not be cleared from the site prior to construction except if vegetation requires relocation as determined through an ecology assessment). This material is to be stripped together with topsoil as it will supplement the organic and possibly seed content of the topsoil stockpile depending on the time of soil stripping (whether plants are in seed or not).
Soil should be handled when dry during removal and placement to reduce the risk of compaction. During construction, sensitive soils with high risk of compaction (e.g., clayey soils) must be avoided by construction vehicles and equipment, wherever possible, to reduce potential impacts.
All compacted areas (including temporary access tracks) are to be ripped/scarified (along contour) to a depth of 150 mm prior to the replacement of topsoil.
Corridors and servitude widths should be secured around the development footprint areas to ensure the current land use (grazing and agriculture) surrounding the site can continue in a functional way after construction.
Topsoil should be handled twice only -once to strip and stockpile, and secondly, to replace, level, shape and scarify.
Stockpile topsoil separately from subsoil.
Topsoil stockpiles should not exceed 2.0 m in height and should be protected by a mulch cover where possible.
Maintain topsoil stockpiles in a weed free condition.
Topsoil should not be compacted in any way, nor should any object be placed or stockpiled upon it
Stockpile topsoil for the minimum time possible i.e., strip just before the relevant activity commences and replace as soon as it is completed.
An Avifaunal walkthrough (as per Condition 36 of the Environmental Authorisation 14/12/16/3/3/1/2444/AM1, 26 June 2023).) must be conducted by a suitably qualified Avifaunal Specialist within one month prior to the commencement of construction to identify breeding sites and ground truth the final layout.
A construction and operational avifaunal monitoring plan needs to be implemented that is in line with BirdLife South Africa/Endangered Wildlife Trust's most recent guideline. It would be best practice to consult the Endangered Wildlife Trust's Wildlife and Energy Group for the most up to date recommendations for what approved nocturnal devices are available before construction begins.
The construction and operational avifaunal monitoring plan, considering BirdLife South Africa/Endangered Wildlife Trust's -to be determine by the Avifaunal Specialist contacted to guide the procedure to follow.

Where possible, it is strongly suggested that the construction of the powerlines be carried out in the winter season when most species are not breeding.
Should helicopters be used during the construction phase, low-level flying should be restricted to the transmission line corridor only.
All high-risk perching surfaces should be fitted with bird guards and perch guards as deterrents (Hunting 2002).
On the 132KV line, the steel monopole design with bird perch must be used. This is a safe structure and will mitigate electrocutions on all species. Should a 400KV line be built these are also safe due to the clearances involved and no further recommendation is needed. The above structure will also mitigate the impact of bird induced faulting that was not mentioned in the report, this is a business impact and a further motivation to use the monopole design.
Installation of artificial bird space perches and nesting platforms, at a safe distance from energised components (Goudie 2006; Prinsen et al. 2012).
Anti-collision bird flapper devices should be fitted to power line cables particularly along the sections running over the drainage lines, along the Florida farm section where there are seasonal pans present, over the grassland habitats in the far-eastern sections of the route and around the marshland habitats at the far-western end of the route. It would be best practice to consult the Endangered Wildlife Trust's Wildlife and Energy Group for the most up to date recommendations for what approved nocturnal devices are available before construction begins.
Solar-powered night deterrents should be placed along the lines in the Florida section where night-flying birds such as flamingos are likely to be active.
All jumpers at transformers, t-offs and strain structures should be insulated and made bird safe (Jenkins 2008).
Increase the conspicuousness of the power line cables and earth-wires by fitting them with appropriate devices, e.g. brightly coloured marker balls, thickened wire coils or bird diverters along the high risk areas of the route. It has been proven that bird collision risk can be reduced by 50–60% when power lines are fitted with these devices (Jenkins 2010). In this regard the Eskom Transmission Bird Collision Guideline document by Vosloo and van Rooyen (2008) should be consulted.
The wetting of soil and the discharge of construction greywater into unspoiled soil should be controlled.
The soil profile is generally poorly developed therefore it is recommended that the pylons be founded in pre-bored holes drilled with a percussion drilling machine as augers will refuse prematurely.
The site is poorly preserved, of medium-low significance and application should be made for the necessary destruction permit from the relevant Heritage Resources Authorities should the site, or parts thereof be impacted on by the construction of monopoles, pylons or other infrastructure. OR Should the site be retained, it is advisable to observe a 10m conservation buffer around the Heritage site: 'Site Exigo-VSPL-HP01'. A site walk down was conducted by the Heritage Specialist on 20 July 2023. The Heritage features were delineated and the original 20 m buffer stipulated in the EA fell away. • During stringing no vehicle must travel through the site but utilise graves should be followed; - o If during the consultation process, it is determined that there are burials present a grave relocation process must be initiated. - o Upon completion of the relocation process construction can commence. - o The site must be monitored during construction on the site by an archaeologist to identify and mitigate any potential archaeological finds or previously unidentified burials that can potentially be unearthed during construction work. - o application should be made for the necessary destruction permit from the relevant Heritage Resources Authorities should the site, or parts thereof be impacted on by the construction of monopoles, pylons or other infrastructure. the rerouted service road. • Guide ropes can be taken through the site on foot during stringing. • If the structures within the sensitive areas cannot be avoided: - o A consultation process to investigate the presence of stillborn and unmarked graves should be followed; - o If during the consultation process, it is determined that there are burials present a grave relocation process must be initiated. - o Upon completion of the relocation process construction can commence. - o The site must be monitored during construction on the site by an archaeologist to identify and mitigate any potential archaeological finds or previously unidentified burials that can potentially be unearthed during construction work. - o application should be made for the necessary destruction permit from the relevant Heritage Resources Authorities should the site, or parts thereof be impacted on by the construction of monopoles, pylons or other infrastructure.
Should any subsurface palaeontological (fossils), archaeological or historical material, or burials be exposed during construction activities, all activities should be suspended and the archaeological specialist and SAHRA should be notified immediately.
As the proposed development has the potential to expose fossils we recommend the following mitigation clauses, that the proposed development be constrained to: - The irrigated cropland that covers most of the study area, currently carrying maize/corn, overlying the mapped Quaternary alluvial deposits; - The non-irrigated naturally vegetated grassland, surrounding the Merriespruit River centrally, the Steenbokspruit River in the east, and the grassland immediately West of the R73
Due to palaeontological sensitivity, we do not recommend development on:- the Merriespruit River, the river edges of exposed alluvium and isolated scattered sandstone boulders nearby; - the Steenbokspruit River and its three erosional gullies or tributary streams.
Implement dust suppressing techniques to reduce dust clouds from construction activities which can limit visibility. These could include the regular wetting of the soil or the application of dust suppressing agents.

During the field work and impact assessment it was noted that the existing vegetation would play a minimal role in screening the proposed project components from VSRs. However, care should still be taken to:- Retain as much of the existing vegetation as possible. - Where vegetation is cleared, a rehabilitation plan should be implemented. This should be done in conjunction with the Vegetation, Visual Impact and any other relevant specialists. - Where possible and required, careful placement of new or transplanted vegetation should be planted in areas relevant to (Visual Sensitive Receptor) VSR site lines.
It is assumed that construction activities would be limited to daylight hours. With regards to the construction camp: - Refrain from causing 'light spillage' beyond the construction camp by installing light fixtures with directional illumination. - Keep lighting to a minimum by installing low-level bollard type lights instead of post top lights along walkways between buildings. - Where possible avoid high flood lights, and instead use lower locally lit installations. - In general, lighting should be carefully directed and only be used where absolutely necessary. Should construction activities extend during night-time, adhere to the same recommendations as for the construction camp.
Colour: Where possible use earthy tones to greys with a toned-down hue, instead of whites and creams, as such combinations are recessive to the eye and tend to be slightly less noticed. Do not keep to a uniform colour but break up the components with slightly different colour tones.
The below are recommendations: Intersection of Virginia Road and Proposed Virginia 1, 2 and 3 access points: - Provide 60 meters dedicated right turn lane on the eastern approach of Virginia Road. - Provide 60 meters dedicated right turn lane on the western approach of Virginia Road. - Provide 60 meters dedicated left turn lane on the eastern approach of Virginia Road. - Provide 60 meters dedicated left turn lane on the western approach of Virginia Road. - Provide 60 meters acceleration lane towards the east of Virginia Road. - Provide 60 meters acceleration lane towards the west of Virginia Road. - Provide reflective road studs as part of the proposed intersection to improve visibility of the intersection geometry when it is dark. - Provide relevant road traffic signs and road markings.
As part of the construction phase, a dedicated loading and off-loading area on site should be established where workers can safely be loaded and offloaded by public transport or arranged transport.
Obtain approval for the position and geometric layout for the proposed access intersection from and to Virginia Road. This approval should be obtained from the Free State Department of Police, Roads and Transport as part of the detailed design phase.
Preparation and implementation of a Stakeholder Engagement Plan (SEP) prior to and during the construction phase. - Where reasonable and practical, the proponent should appoint local contractors and implement a 'locals first' policy, especially for semi and low-skilled job categories. - Where feasible, appoint local contractors that are compliant with Broad Based Black Economic Empowerment (BBBEE) criteria.
Preparation and implementation of a Stakeholder Engagement Plan (SEP) prior to and during the construction phase. - Preparation and implementation of a Community Health, Safety and Security Plan (CHSSP) prior to and during the construction phase. - The SEP and CHSSP should include a Grievance Mechanism that enables stakeholders to report resolve incidents. - The proponent and contractor should develop a Code of Conduct (CoC) for construction workers. The proponent and the contractor should implement an HIV/AIDS, COVID-19 and Tuberculosis (TB) awareness programme for all construction workers at the outset of the construction phase. The programmes should form part of the CHSSP.
The proponent should implement a policy that no employment will be available at the gate.
All farm gates must be closed after passing through. - Should damage to farmland occur, a Grievance procedure must be implemented and followed - Contractors appointed by the proponent must ensure that all workers are informed at the outset of the construction phase of the conditions contained in the Code of Conduct, specifically consequences of stock theft and trespassing on adjacent farms.
Contractor should ensure that open fires on the site for cooking or heating are not allowed except in designated areas. - Smoking on site should be confined to designated areas. - Contractor should ensure that construction related activities that pose a potential fire risk, such as welding, are properly managed and are confined to areas where the risk of fires has been reduced. Measures to reduce the risk of fires include avoiding working in high wind conditions when the risk of fires is greater. In this regard special care should be taken during the high-risk dry, windy winter months.
Establishment of a Grievance Mechanism that provides local farmers and other road users with an effective and efficient mechanism to address issues related to construction related impacts, including damage to local gravel farm roads. - The movement of heavy vehicles associated with the construction phase should be timed to avoid times days of the week, such as weekends, when the volume of traffic travelling along the access roads may be higher.

Compliance		Findings & Recommendations
Finding	Score	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	registers are available
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Not Applicable / Not Audited	NA	no workers are accommodated onsite
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Not Applicable / Not Audited	NA	works not yet complete
Compliant	2	
Informative	INFO	
Compliant	2	
Informative	INFO	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Informative	INFO	
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Compliant	2	
Compliant	2	

Informative	INFO	
Informative	INFO	
Informative	INFO	
Compliant	2	
Not Applicable / Not Audited	NA	works not yet complete
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Not Applicable / Not Audited	NA	
Compliant	2	
Partially Compliant	1	more measures are required
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
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Compliant	2	
Compliant	2	
Compliant	2	
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Informative	INFO	

[illegible]

Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Informative	INFO	
Informative	INFO	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Not Applicable / Not Audited	NA	no fuel storage is done on site
Partially Compliant	1	no oil separator noted,
Compliant	2	
Compliant	2	
Compliant	2	
Informative	INFO	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Not Applicable / Not Audited	NA	no vehicles are maintained onsite
Not Applicable / Not Audited	NA	
Compliant	2	
Not Applicable / Not Audited	NA	no workshops onsite
Compliant	2	
Not Applicable / Not Audited	NA	no workshops onsite
Not Applicable / Not Audited	NA	
Compliant	2	
Not Applicable / Not Audited	NA	there are no batching plants onsite
Not Applicable / Not Audited	NA	
Compliant	2	
Not Applicable / Not Audited	NA	there is no wash facility
Compliant	2	
Compliant	2	
Informative	INFO	

[illegible]

[illegible]

Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Not Applicable / Not Audited	NA	rehabilitation not yet started onsite
Not Applicable / Not Audited	NA	
Not Applicable / Not Audited	NA	
Not Applicable / Not Audited	NA	
Not Applicable / Not Audited	NA	
Not Applicable / Not Audited	NA	
Not Applicable / Not Audited	NA	
Not Applicable / Not Audited	NA	
Not Applicable / Not Audited	NA	
Not Applicable / Not Audited	NA	
Not Applicable / Not Audited	NA	
Not Applicable / Not Audited	NA	
Compliant	2	pylon positions are as per the approved final la
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Not Applicable / Not Audited	NA	pylons not yet placed
Not Applicable / Not Audited	NA	
Compliant	2	
Compliant	2	
Compliant	2	
Not Applicable / Not Audited	NA	no pesticides and poisons are used onsite
Not Applicable / Not Audited	NA	
Compliant	2	
Compliant	2	
Compliant	2	

Partially Compliant	1	alien vegetation was observed (recurring)
Compliant	2	
Not Applicable / Not Audited	NA	rehabilitation not yet started onsite
Compliant	2	stormwater measures are put in place
Not Applicable / Not Audited	NA	pylons not yet placed
Compliant	2	recycling now done on site
Informative	INFO	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Not Applicable / Not Audited	NA	rehabilitation not yet started onsite
Compliant	2	
Compliant	2	
Compliant	2	
Informative	INFO	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	

Informative	INFO	
Compliant	2	
Partially Compliant	1	alien vegetation observed
Not Applicable / Not Audited	NA	Rehabilitation not yet started onsite
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Partially Compliant	1	alien vegetation clearing on stock piles has bec
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	

Informative	INFO	
Informative	INFO	
Not Applicable / Not Audited	NA	lines not yet installed
Not Applicable / Not Audited	NA	
Not Applicable / Not Audited	NA	
Not Applicable / Not Audited	NA	
Not Applicable / Not Audited	NA	
Not Applicable / Not Audited	NA	
Not Applicable / Not Audited	NA	
Not Applicable / Not Audited	NA	
Compliant	2	
Compliant	2	
Informative	INFO	
Informative	INFO	
Informative	INFO	
Compliant	2	

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Compliant	2	
Compliant	2	
Compliant	2	

328

MAX SCORE	656	
Compliant	221	442
Partial Compliance	8	8
Non-Compliant	0	0
Work in Progress	0	
INFO	46	

NA	53
328	
Max Auditable Score	458
Overall Percentage	98%

450

458

98%

ie demarcated (recurring),

he stock piles

yout.

jan

Project: Virginia Solar Plant
All staff must receive environmental awareness training prior to commencement of the activities;
The Contractor must allow for sufficient sessions to train all personnel with no more than 20 personnel attending each course;
Refresher environmental awareness training is available as and when required;
All staff are aware of the conditions and controls linked to the EA and within the EMPr and made aware of their individual roles and responsibilities in achieving compliance with the EA and EMPr;
The Contractor must erect and maintain information posters at key locations on site, and the posters must include the following information as a minimum: a) Safety notifications; and b) No littering.
Environmental awareness training must include as a minimum the following: a) Description of significant environmental impacts, actual or potential, related to their work activities. b) Mitigation measures to be implemented when carrying out specific activities. c) Emergency preparedness and response procedures. d) Emergency procedures. e) Procedures to be followed when working near or within sensitive areas. f) Wastewater management procedures. g) Water usage and conservation. h) Solid waste management procedures. i) Sanitation procedures. j) Fire prevention; and k) Disease prevention.
A record of all environmental awareness training courses undertaken as part of the EMPr must be available;
Educate workers on the dangers of open and/or unattended fires;
A staff attendance registers of all staff to have received environmental awareness training must be available.
Course material must be available and presented in appropriate languages that all staff can understand.
A method statement must be provided by the contractor prior to any onsite activity that includes the layout of the construction camp in the form of a plan showing the location of key infrastructure and services (where applicable), including but not limited to offices, overnight vehicle parking areas, stores, the workshop, stockpile and lay down areas, hazardous materials storage areas (including fuels), the batching plant (if one is located at the construction camp), designated access routes, equipment cleaning areas and the placement of staff accommodation, cooking and ablution facilities, waste and wastewater management;
Location of construction camps must be within approved area to ensure that the site does not impact on sensitive areas identified in the environmental assessment or site walk through;
Sites must be located where possible on previously disturbed areas;
The camp must be fenced in accordance with Section 5.5: Fencing and gate installation; and
The use of existing accommodation for contractor staff, where possible, is encouraged.
Identification of access restricted areas is to be informed by the environmental assessment, site walk through, and any additional areas identified during development;
Erect, demarcate and maintain a temporary barrier with clear signage around the perimeter of any access restricted area, colour coding could be used if appropriate; and
Unauthorised access and development related activity inside access restricted areas is prohibited.
An access agreement must be formalized and signed by the DPM, Contractor and landowner before commencing with the activities;
All private roads used for access to the servitude must be maintained and upon completion of the works, be left in at least the original condition
All contractors must be made aware of all these access routes.
Maximum use of both existing servitudes and existing roads must be made to minimise further disturbance through the development of new roads;
In circumstances where private roads must be used, the condition of the said roads must be recorded in accordance with section 4.9: photographic record; prior to use and the condition thereof agreed by the landowner, the DPM, and the contractor;
Access roads in flattish areas must follow fence lines and tree belts to avoid fragmentation of vegetated areas or croplands
Access roads must only be developed on pre-planned and approved roads.
Use existing gates provided to gain access to all parts of the area authorised for development, where possible;
Existing and new gates to be recorded and documented in accordance with section 4.9: photographic record;
All gates must be fitted with locks and be kept locked at all times during the development phase, unless otherwise agreed with the landowner;
At points where the line crosses an existing fence in which there is no suitable gate within the extent of the line servitude, on the instruction of the DPM, a gate must be installed at the approval of the landowner;
Care must be taken that the gates must be so erected that there is a gap of no more than 100 mm between the bottom of the gate and the ground;
Where gates are installed in jackal proof fencing, a suitable reinforced concrete still must be provided beneath the gate;
Original tension must be maintained in the fence wires;
All gates installed in electrified fencing must be reelectrified;
All demarcation fencing and barriers must be maintained in good working order for the duration of the development activities;
Fencing must be erected around the camp, batching plants, hazardous storage areas, and all designated access restricted areas, where applicable;
Any temporary fencing to restrict the movement of livestock must only be erected with the permission of the land owner.
All fencing must be developed of high-quality material bearing the SABS mark;
The use of razor wire as fencing must be avoided as far as possible;
Fenced areas with gate access must remain locked after hours, during weekends and on holidays if staff is away from site. Site security will be required at all times;

On completion of the development phase all temporary fences are to be removed;
The contractor must ensure that all fence uprights are appropriately removed, ensuring that no uprights are cut at ground level but rather removed completely.
All abstraction points or bore holes must be registered with the DWS and suitable water meters installed to ensure that the abstracted volumes are measured on a daily basis;
The Contractor must ensure the following: a. The vehicle abstracting water from a river does not enter or cross it and does not operate from within the river. b. No damage occurs to the river bed or banks and that the abstraction of water does not entail stream diversion activities; and c. All reasonable measures to limit pollution or sedimentation of the downstream watercourse are implemented.
Ensure water conservation is being practiced by: a. Minimising water use during cleaning of equipment. b. Undertaking regular audits of water systems; and c. Including a discussion on water usage and conservation during environmental awareness training. d. The use of grey water is encouraged.
Runoff from the cement/ concrete batching areas must be strictly controlled, and contaminated water must be collected, stored and either treated or disposed of off-site, at a location approved by the project manager;
All spillage of oil onto concrete surfaces must be controlled by the use of an approved absorbent material and the used absorbent material disposed of at an appropriate waste disposal facility;
Natural stormwater runoff not contaminated during the development and clean water can be discharged directly to watercourses and water bodies, subject to the Project Manager's approval and support by the ECO, ESCO;
Water that has been contaminated with suspended solids, such as soils and silt, may be released into watercourses or water bodies only once all suspended solids have been removed from the water by settling out these solids in settlement ponds. The release of settled water back into the environment must be subject to the Project Manager's approval and support by the ECO, ESCO.
All measures regarding waste management must be undertaken using an integrated waste management approach;
Sufficient, covered waste collection bins (scavenger and weatherproof) must be provided;
A suitably positioned and clearly demarcated waste collection site must be identified and provided
The waste collection site must be maintained in a clean and orderly manner;
Waste must be segregated into separate bins and clearly marked for each waste type for recycling and safe disposal;
Staff must be trained in waste segregation;
Bins must be emptied regularly;
General waste produced onsite must be disposed of at registered waste disposal sites/ recycling company;
Hazardous waste must be disposed of at a registered waste disposal site;
Certificates of safe disposal for general, hazardous, and recycled waste must be maintained.
All watercourses must be protected from direct or indirect spills of pollutants such as solid waste, sewage, cement, oils, fuels, chemicals, aggregate tailings, wash and contaminated water or organic material resulting from the Contractor's activities;
In the event of a spill, prompt action must be taken to clear the polluted or affected areas
Where possible, no development equipment must traverse any seasonal or permanent wetland
No return flow into the estuaries must be allowed and no disturbance of the Estuarine functional Zone should occur;
Development of permanent watercourse or estuary crossing must only be undertaken where no alternative access to tower position is available;
There must not be any impact on the long-term morphological dynamics of watercourses or estuaries;
When working in or near any watercourse or estuary, the following environmental controls and consideration must be taken: a) Water levels during the period of construction. No altering of the bed, banks, course, or characteristics of a watercourse b) During the execution of the works, appropriate measures to prevent pollution and contamination of the riparian environment must be implemented e.g., including ensuring that construction equipment is well maintained. c) Where earthwork is being undertaken in close proximity to any watercourse, slopes must be stabilised using suitable materials, i.e., sandbags or geotextile fabric, to prevent sand and rock from entering the channel; and d) Appropriate rehabilitation and re-vegetation measures for the watercourse banks must be implemented timeously. In this regard, the banks should be appropriately and incrementally stabilised as soon as development allows.
Indigenous vegetation which does not interfere with the development must be left undisturbed
Protected or endangered species may occur on or near the development site. Special care should be taken not to damage such species;
Search, rescue, and replanting of all protected and endangered species likely to be damaged during project development must be identified by the relevant specialist and completed prior to any development or clearing;
Permits for removal must be obtained from the relevant CA prior to the cutting or clearing of the affected species, and they must be filed;
The Environmental Audit Report must confirm that all identified species have been rescued and replanted and that the location of replanting is compliant with conditions of approvals;
Trees felled due to construction must be documented and form part of the Environmental Audit Report;
Rivers and watercourses must be kept clear of felled trees, vegetation cuttings and debris;
Only a registered pest control operator may apply herbicides on a commercial basis and commercial application must be carried out under the supervision of a registered pest control operator, supervision of a registered pest control operator or is appropriately trained;
A daily register must be kept of all relevant details of herbicide usage;
All protected species and sensitive vegetation not removed must be clearly marked and such areas fenced off in accordance with Section 5.3: Access restricted areas.
Alien invasive vegetation must be removed and disposed of at a licensed waste management facility.

No interference with livestock must occur without the landowner's written consent and with the landowner or a person representing the landowner being present;
The breeding sites of raptors and other wild birds' species must be taken into consideration during the planning of the development programme;
Special recommendations of the avian specialist must be adhered to at all times to prevent unnecessary disturbance of birds;
No poaching must be tolerated under any circumstances. All animal dens in close proximity to the works areas must be marked as Access restricted areas;
No deliberate or intentional killing of fauna is allowed;
In areas where snakes are abundant, snake deterrents are to be deployed on the pylons to prevent snakes climbing up, being electrocuted, and causing power outages; and
No Threatened or Protected species (ToPs) and/or protected fauna as listed according NEMBA (Act No. 10 of 2004), and relevant provincial ordinances may be removed and/or relocated without appropriate authorisations/permits.
Identify, demarcate, and prevent impact to all known sensitive heritage features on site in accordance with the No-Go procedure in Section 5.3: Access restricted areas;
Carry out general monitoring of excavations for potential fossils, artefacts, and material of heritage importance;
All work must cease immediately, if any human remains and/or other archaeological, palaeontological, and historical material are uncovered. Such material, if exposed, must be reported to the nearest museum, archaeologist/ palaeontologist (or the South African Police Services), so that a systematic and professional investigation can be undertaken. Sufficient time must be allowed to remove/collect such material before development recommences.
Identify fire hazards, demarcate, and restrict public access to these areas as well as notify the local authority of any potential threats e.g., large brush stockpiles, fuels etc.;
All unattended open excavations must be adequately fenced or demarcated;
Adequate protective measures must be implemented to prevent unauthorised access to and climbing of partly constructed infrastructure and protective scaffolding;
Ensure structures vulnerable to high winds are secured;
Maintain an incidents and complaints register in which all incidents or complaints involving the public are logged.
Mobile chemical toilets are installed onsite if no other ablution facilities are available;
The use of ablution facilities and or mobile toilets must be used at all times and no indiscriminate use of the veld for the purposes of ablutions must be permitted under any circumstances;
Where mobile chemical toilets are required, the following must be ensured: a) Toilets are located no closer than 100 m to any watercourse or water body. b) Toilets are secured to the ground to prevent them from toppling due to wind or any other cause) No spillage occurs when the toilets are cleaned or emptied, and the contents are managed in accordance with the EMPr. d) Toilets have an external closing mechanism and are closed and secured from the outside when not in use to prevent toilet paper from being blown out. e) Toilets are emptied before long weekends and workers holidays and must be locked after working hours. f) Toilets are serviced regularly, and the ECO, ESCO must inspect toilets to ensure compliance to health standards;
A copy of the waste disposal certificates must be maintained.
Undertake environmentally friendly pest control in the camp area;
Ensure that the workforce is sensitised to the effects of sexually transmitted diseases, especially HIV/ AIDS;
The Contractor must ensure that information posters on HIV/ AIDS are displayed in the Contractor Camp area;
Information and education relating to sexually transmitted diseases to be made available to both construction workers and local community, where applicable;
Free condoms must be made available to all staff on site at central points;
Medical support must be made available;
Provide access to Voluntary HIV Testing and Counselling Services.
Compile an Emergency Response Action Plan (ERAP) prior to the commencement of the proposed project;
The Emergency Plan must deal with accidents, potential spillages, and fires in line with relevant legislation;
All staff must be made aware of emergency procedures as part of environmental awareness training;
The relevant local authority must be made aware of a fire as soon as it starts;
In the event of emergency necessary mitigation measures to contain the spill or leak must be implemented (see Hazardous Substances section 5.17).
The use and storage of hazardous substances to be minimised and non-hazardous and non-toxic alternatives substituted where possible;
All hazardous substances must be stored in suitable containers as defined in the Method Statement;
Containers must be clearly marked to indicate contents, quantities, and safety requirements;
All storage areas must be bunded. The bunded area must be of sufficient capacity to contain a spill / leak from the stored containers;
Bunded areas to be suitably lined with a SABS approved liner;
An Alphabetical Hazardous Chemical Substance (HCS) control sheet must be drawn up and kept up to date on a continuous basis;
All hazardous chemicals that will be used on site must have Material Safety Data Sheets (MSDS);
All employees working with HCS must be trained in the safe use of the substance and according to the safety data sheet;
Employees handling hazardous substances / materials must be aware of the potential impacts and follow appropriate safety measures. Appropriate personal protective equipment must be made available;
The Contractor must ensure that diesel and other liquid fuel, oil and hydraulic fluid is stored in appropriate storage tanks or in bowers

The tanks/ bowsters must be situated on a smooth impermeable surface (concrete) with a permanent bund. The impermeable lining must extend to the crest of the bund and the volume inside the bund must be 130% of the total capacity of all the storage tanks/ bowsters (110% statutory requirement plus an allowance for rainfall);
The floor of the bund must be sloped, draining to an oil separator;
Provision must be made for refuelling at the storage area by protecting the soil with an impermeable groundcover. Where dispensing equipment is used, a drip tray must be used to ensure small spills are contained;
All empty externally dirty drums must be stored on a drip tray or within a bunded area;
No unauthorised access into the hazardous substance's storage areas must be permitted;
No smoking must be allowed within the vicinity of the hazardous storage areas;
Adequate fire-fighting equipment must be made available at all hazardous storage areas;
Where refuelling away from the dedicated refuelling station is required, a mobile refuelling unit must be used. Appropriate ground protection such as drip trays must be used;
An appropriately sized spill kit kept onsite relevant to the scale of the activity/s involving the use of hazardous substance must be available at all times;
The responsible operator must have the required training to make use of the spill kit in emergency situations;
An appropriate number of spill kits must be available and must be located in all areas where activities are being undertaken;
In the event of a spill, contaminated soil must be collected in containers and stored in a central location and disposed of according to the National Environmental Management: Waste Act 59 of 2008. Refer to Section 5.7 for procedures concerning storm and waste water management and 5.8 for solid and hazardous waste management.
Where possible and practical all maintenance of vehicles and equipment must take place in the workshop area;
During servicing of vehicles or equipment, especially where emergency repairs are affected outside the workshop area, a suitable drip tray must be used to prevent spills onto the soil. The relevant local authority must be made aware of a fire as soon as it starts;
Leaking equipment must be repaired immediately or be removed from site to facilitate repair;
Workshop areas must be monitored for oil and fuel spills;
Appropriately sized spill kit kept onsite relevant to the scale of the activity taking place must be available;
The workshop area must have a bunded concrete slab that is sloped to facilitate runoff into a collection sump or suitable oil / water separator where maintenance work on vehicles and equipment can be performed;
Water drainage from the workshop must be contained and managed in accordance Section 5.7: Storm and waste water management.
Concrete mixing must be carried out on an impermeable surface;
Batching plants areas must be fitted with a containment facility for the collection of cement laden water.
Dirty water from the batching plant must be contained to prevent soil and groundwater contamination
Bagged cement must be stored in an appropriate facility and at least 10 m away from any water courses, gullies, and drains;
A washout facility must be provided for washing of concrete associated equipment. Water used for washing must be restricted;
Hardened concrete from the washout facility or concrete mixer can either be reused or disposed of at an appropriate licensed disposal facility;
Empty cement bags must be secured with adequate binding material if these will be temporarily stored on site;
Sand and aggregates containing cement must be kept damp to prevent the generation of dust (Refer to Section 5.20: Dust emissions)
Any excess sand, stone and cement must be removed or reused from site on completion of the construction period and disposed at a registered disposal facility;
Temporary fencing must be erected around batching plants in accordance with Section 5.5: Fencing and gate installation.
Take all reasonable measures to minimise the generation of dust as a result of project development activities to the satisfaction of the ECO, ESCO;
Removal of vegetation must be avoided until such time as soil stripping is required and similarly exposed surfaces must be re-vegetated or stabilised as soon as is practically possible;
Excavation, handling, and transport of erodible materials must be avoided under high wind conditions or when a visible dust plume is present;
During high wind conditions, the ECO, ESCO must evaluate the situation and make recommendations as to whether dust-damping measures are adequate, or whether working will cease altogether until the wind speed drops to an acceptable level;
Vehicle speeds must not exceed 30 km/h along dust roads or 20 km/h when traversing unconsolidated and no vegetated areas:
Straw stabilisation must be applied at a rate of one bale/10 m ² and harrowed into the top 100 mm of top material, for all completed earthworks:
For significant areas of excavation or exposed ground, dust suppression measures must be used to minimise the spread of dust.
Any blasting activity must be conducted by a suitably licensed blasting contractor; and
Notification of surrounding landowners, emergency services site personnel of blasting activity 24 hours prior to such activity taking place on Site.
The Contractor must keep noise level within acceptable limits, Restrict the use of sound amplification equipment for communication and emergency only;
All vehicles and machinery must be fitted with appropriate silencing technology and must be properly maintained;

Any complaints received by the Contractor regarding noise must be recorded and communicated. Where possible or applicable, provide transport to and from the site on a daily basis for construction workers;
Develop a Code of Conduct for the construction phase in terms of behaviour of construction staff. Operating hours as determined by the environmental authorisation are adhered to during the development phase. Where not defined, it must be ensured that development activities must still meet the impact management outcome related to noise management.
Designate smoking areas where the fire hazard could be regarded as insignificant;
Firefighting equipment must be available on all vehicles located on site
The local Fire Protection Agency (FPA) must be informed of construction activities;
Contact numbers for the FPA and emergency services must be communicated in environmental awareness training and displayed at a central location on site;
Two-way swap of contact details between ECO, ESCO and FPA.
All material that is excavated during the project development phase (either during piling (if required) or earthworks) must be stored appropriately on site in order to minimise impacts to watercourses and water bodies;
All stockpiled material must be maintained and kept clear of weeds and alien vegetation growth by undertaking regular weeding and control methods;
Topsoil stockpiles must not exceed 2 m in height:
During periods of strong winds and heavy rain, the stockpiles must be covered with appropriate material (e.g., cloth, tarpaulin etc.);
Where possible, sandbags (or similar) must be placed at the bases of the stockpiled material in order to prevent erosion of the material.
Where terracing is required, topsoil must be collected and retained for the purpose of re-use later to rehabilitate disturbed areas not covered by yard stone;
Areas to be rehabilitated include terrace embankments and areas outside the high voltage yards;
Where required, all sloped areas must be stabilised to ensure proper rehabilitation is affected and erosion is controlled;
These areas can be stabilised using design structures or vegetation as specified in the design to prevent erosion of embankments. The contract design specifications must be adhered to and implemented strictly
Rehabilitation of the disturbed areas must be managed in accordance with Section 5.35: Landscaping and rehabilitation;
All excess spoil generated during terracing activities must be disposed of in an appropriate manner and at a rECO, ESCOgnised landfill site; and
Spoil can however be used for landscaping purposes and must be covered with a layer of 150 mm topsoil for rehabilitation purposes.
All excess spoil generated during foundation excavation must be disposed of in an appropriate manner and at a licensed landfill site, if not used for backfilling purposes;
Management of equipment for excavation purposes must be undertaken in accordance with Section 5.18: Workshop, equipment maintenance and storage; and
Hazardous substances spills from equipment must be managed in accordance with Section 5.17: Hazardous substances.
Batching of cement to be undertaken in accordance with Section 5.19: Batching plants; and
Residual solid waste must be disposed of in accordance with Section 5.8: Solid waste and hazardous management.
Management of dust must be conducted in accordance with Section 5. 20: Dust emissions;
Management of equipment used for installation must be conducted in accordance with Section 5.18: Workshop, equipment maintenance and storage;
Management of hazardous substances and any associated spills must be conducted in accordance with Section 5.17: Hazardous substances; and
Residual solid waste must be recycled or disposed of in accordance with Section 5.8: Solid waste and hazardous management.
Residual solid waste (off cuts etc.) shall be recycled or disposed of in accordance with Section 6.8: Solid waste and hazardous Management;
Management of equipment used for installation shall be conducted in accordance with Section 5.18: Workshop, equipment maintenance and storage;
Management of hazardous substances and any associated spills shall be conducted in accordance with Section 5.17: Hazardous substances.
Develop and implement communication strategies to facilitate public participation;
Develop and implement a collaborative and constructive approach to conflict resolution as part of the external stakeholder engagement process;
Sustain continuous communication and liaison with neighbouring owners and residents
Create work and training opportunities for local stakeholders; and
Where feasible, no workers, with the exception of security personnel, must be permitted to stay over-night on the site. This would reduce the risk to local farmers.
Bunds must be emptied (where applicable) and need to be undertaken in accordance with the impact management actions included in sections 5.17: Hazardous substances and 5.18: Workshop, equipment maintenance and storage;
Hazardous storage areas must be well ventilated;
Fire extinguishers must be serviced and accessible. Service records to be filed and audited at last service;
Emergency and contact details displayed must be displayed;
Security personnel must be briefed and have the facilities to contact or be contacted by relevant management and emergency personnel;
Night hazards such as reflectors, lighting, traffic signage etc. must have been checked;

Fire hazards identified and the local authority must have been notified of any potential threats e.g., large brush stockpiles, fuels etc.;
Structures vulnerable to high winds must be secured;
Wind and dust mitigation must be implemented;
Cement and materials stores must have been secured;
Toilets must have been emptied and secured;
Refuse bins must have been emptied and secured;
Drip trays must have been emptied and secured.
All old equipment removed during the project must be stored in such a way as to prevent pollution of the environment;
Oil containing equipment must be stored to prevent leaking or be stored on drip trays;
All scrap steel must be stacked neatly, and any disused and broken insulators must be stored in containers;
Once material has been scrapped and the contract has been placed for removal, the disposal Contractor must ensure that any equipment containing pollution causing substances is dismantled and transported in such a way as to prevent spillage and pollution of the environment;
The Contractor must also be equipped to contain and clean up any pollution causing spills; and
Disposal of unusable material must be at a licensed waste disposal site.
All areas disturbed by construction activities must be subject to landscaping and rehabilitation; All spoil and waste must be disposed of to a registered waste site;
All slopes must be assessed for contouring, and to contour only when the need is identified in accordance with the Conservation of Agricultural Resources Act, No 43 of 1983
Berms that have been created must have a slope of 1:4 and be replanted with indigenous species and grasses that approximates the original condition;
Where new access roads have crossed cultivated farmlands, that lands must be rehabilitated by ripping which must be agreed to by the holder of the EA and the landowners;
Rehabilitation of access roads inside of farmland
Indigenous species must be used for with species and/grasses to where it compliments or approximates the original condition;
Stockpiled topsoil must be used for rehabilitation (refer to Section 5.24: Stockpiling and stockpiled areas);
Stockpiled topsoil must be evenly spread so as to facilitate seeding and minimise loss of soil due to erosion;
Before placing topsoil, all visible weeds from the placement area and from the topsoil must be removed
Subsoil must be ripped before topsoil is placed;
The rehabilitation must be timed so that rehabilitation can take place at the optimal time for vegetation establishment;
Where impacted through construction related activity, all sloped areas must be stabilised to ensure proper rehabilitation is effected and erosion is controlled;
Sloped areas stabilised using design structures or vegetation as specified in the design to prevent erosion of embankments. The contract design specifications must be adhered to and implemented strictly;
Spoil can be used for backfilling or landscaping as long as it is covered by a minimum of 150 mm of topsoil.
Where required, re-vegetation including hydro-seeding can be enhanced using a vegetation seed mixture as described below. A mixture of seed can be used provided the mixture is carefully selected to ensure the following: a) Annual and perennial plants are chosen. b) Pioneer species are included. c) Species chosen must be indigenous to the area with the seeds used coming from the area. d) Root systems must have a binding effect on the soil. e) The final product must not cause an ecological imbalance in the area

Compliance		
Finding	Score	Findings & Recommendations
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Not Applicable / Not Audited	NA	no staff is accommodated onsite
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Not Applicable / Not Audited	NA	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Informative	INFO	
Informative	INFO	
Compliant	2	
Informative	INFO	
Informative	INFO	
Informative	INFO	
Informative	INFO	
Compliant	2	
Compliant	2	
Compliant	2	
Informative	INFO	
Informative	INFO	
Compliant	2	

[illegible]

Not Applicable / Not Audited	NA	No fuel is stored onsite
Partially Compliant	1	bund is not roofed and no oil separator
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Not Applicable / Not Audited	NA	no workshop onsite
Not Applicable / Not Audited	NA	
Compliant	2	
Compliant	2	
Compliant	2	
Not Applicable / Not Audited	NA	no workshop onsite
Not Applicable / Not Audited	NA	
Compliant	2	
Not Applicable / Not Audited	NA	no batching plants on site
Not Applicable / Not Audited	NA	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Informative	INFO	
Informative	INFO	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Compliant	2	
Not Applicable / Not Audited	NA	no works have been completed
Compliant	2	
Not Applicable / Not Audited	NA	no blasting was done
Compliant	2	
Compliant	2	
Compliant	2	

[illegible]



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:

February 2026

PREPARED BY:

NCC Operations

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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 March 2026

Environmental Control Officer

NCC Operations (Pty) Ltd

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REPORT TITLE	Monthly ECO Environmental Monitoring Report
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ECO	NCC Operations (Pty) Ltd
REVISION	00
DATE	03/03/2026

Revision	Date	Description
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Rev 01	TBC	Final - Authority submission

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ABBREVIATIONS

BAR	Basic Assessment Report
CA	Competent Authority
DEA	Department of Environmental Affairs (now DFFE)
DFFE	Department of Forestry, Fisheries, and the Environment
DWS	Department of Water and Sanitation
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
EO	Environmental Officer (Contractor)
ER	Employer's Representative
ESCO	Environmental Site Compliance Officer
kV	Kilovolt
MVA	Megavolt Amperes
MW	Megawatt
NCC	NCC Operations
NCR	Non-Compliance Report
NEMA	National Environmental Management Act (No. 107 of 1998)
NWA	National Water Act (No. 36 of 1998)
OHPL	Overhead Power Line
SDC	Safe Disposal Certificate
SHE	Safety, Health, and Environment
SS	Substation
TBC	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/AM2)
- 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101/AM2)

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	11 September 2023	Terramanzi Group (Pty) Ltd	October 2023
Virginia 2 Solar Park	14/12/16/3/3/2/2100/A M2	24 August 2023	Terramanzi Group (Pty) Ltd	October 2023
Virginia 3 Solar Park	14/12/16/3/3/2/2101/A M2	07 September 2023	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 23rd of February 2026 after which this report was compiled which serves to document and audit. This report covers the monthly reporting for the month of February 2026

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.

Company	NCC Operations (Pty) Ltd
Auditor	Jennipher Sakaunda
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Address	26 Bell Close, Westlake Business Park Westlake, 7945
Affiliation	International Association of Impact Assessment South Africa. Environmental Assessment Practitioner Association of South Africa. South African Council of Natural Scientific Professions.
Qualifications	BSc (honors) Environmental Management
Expertise	A detailed CV can be provided on request.

3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (February 2026) 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 23rd of February 2026 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 varies compartments where waste is 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.

4.1 Domestic/ General Waste

A total of **20 592 kg** of general waste was generated on site in the month of February 2026; **4 734 kg** constituting boxes and wooden pallets were recycled. A total of **15 858 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 **6 391 kg** of hazardous waste in February 2026. 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 **95681.5 L** of sewerage waste was generated on site in the month of February 2026. 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 is proposing to use herbicides to eradicate alien vegetation onsite. The contractor must evaluate the Safety Data Sheets of the herbicides to ensure that the herbicides are safe to use. The project manager and the ECO must approve the herbicide before being applied. Water Management

The contractor has abstracted **2 044m³** of water from Sluice 16 and about **443 m³** water were abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The GA allows for abstraction of 43 000m³ annually, the contractor must ensure water abstraction does not exceed the licenced volumes.

6.2 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.

6.3 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 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 area 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 February 2026 covering the following topics:

- Spill Prevention and Management
- Hazardous material plan
- Waste Separation on site
- Soil Erosion and Control
- Wildlife and Plant Protection on Site
- Grievance Policy
- Sensitive Area (Tower 14)
- Inclement weather
- Environmental Awareness
- Control of Hazardous Substances
- Smoking Policy
- Spill prevention and Management Awareness
- Housekeeping and Hazard Prevention
- Snake Awareness
- Spill prevention and 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 February 2026

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 February 2026. A register of environmental incidents is attached as **Annexure C**.

14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 23rd of February 2026 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.
- Majority of machines were standing with no drip trays increasing the chances of spillages causing soil and water pollution.
- Erosion damage was observed on the road and PV areas.
- A truck was leaking near the main gate.
- Equipment was parked in the stormwater drainage.
- Soil stockpiles exceed 2m in height.
- Large quantities of wood are kept that the laydown areas presenting 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:

- 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.

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.
- Stormwater measures must be implemented.

19 AUDIT SUMMARY

In terms of the findings and results of the **February 2026** ECO audit, the project achieved an overall **97.18 % 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)	255	20	0	0	16	29	(96%)
5	EMPr Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)	251	24	0	0	17	28	(96%)
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		805	61	0	3	136	102	
Audited conditions		1610	59	0	-	-	-	(Potential max score)
Overall Compliance Rating Calculation (%)		97.18%						

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 equipment must be equipped with a drip tray.
- 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.
- Machinery must be moved out of the drainage line.
- Wood pallets at the PV 2 laydown areas must be moved for recycling.

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.

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

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ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

Open Concerns/Complaint

No	Observation date	Concern/Complaint	Suggested Due Date ¹	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 (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/ 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 (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/ 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
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 (below 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 contaminated soil was collected into the bags and taken to site waste management area.	4 litres (below 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.
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 (below 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.

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 th 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 (below 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 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 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 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 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	+/- 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.

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 proceed with work, and they properly cleaned the spillage, and the contaminated soil was collected into			
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 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.

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
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 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/ 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
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.
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/ 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
17/11/2025	Hydraulic oil spillage	oil 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.
23/01/2026	Hydraulic oil spillage	oil Soil contamination	Approximately 18-20 litres of oil spilled when an excavator was offloaded from a truck at the onboarding area on PV 3. The driver drove to the parking lot and parked the machine and when he got off, he saw that it was spilling oil from the moment it was offloaded from the truck. A drip tray was immediately put a under the machine. He also found out that the hydraulic pipe busted during offloading. Negligence during the offloading process led to the oil spill.	18-20L	A drip tray was placed; however, the drip tray was damaged. The spill was cleaned using spill kits.	Drip tray must be used all the time.
05/02/2026	Hydraulic oil spillage	oil Soil contamination	The incident occurred as the driver was driving from the quarry to PV3 to dump material. The tipper truck was unable to lift the tipping body and dump the material. When the mechanic was removing the old oil pump and replacing it with a new one, some of the remaining oil in the pipe splashed onto the ground, about 6 litres.	6-8L	Some absorbents were spread on the affected area to absorb the oil.	None

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
23/02/2026	Hydraulic oil spillage	Soil contamination	A hydraulic hose on a front-end loader burst during operation, resulting in a hydraulic oil spill from the machine. The incident occurred outside the main gate of PV1 and PV2, approximately 80 m west of the main road at Virginia Solar Park. The operator was legally appointed by ML Nkosi to operate the front-end loader and had been on shift for approximately 4 hours at the time of the incident. Upon identifying the leak, the operator isolated the machine and positioned a drip tray beneath it before leaving the site to source the tools and parts required to carry out repairs.	3-5l	The affected area was cordoned off to prevent further disturbance of the contaminated soil. Oil absorbents were immediately spread over the affected area. The absorbent material was collected and placed in a heavy-duty sack. Visibly contaminated soil was excavated and placed into the same sack for disposal. The excavated area was subsequently backfilled and reinstated.	None

ANNEXURE D – PHOTOGRAPHS



Figure 1: Condition of the access roads.



Figure 2: Water ponding at the waste area



Figure 3: Leaking truck.

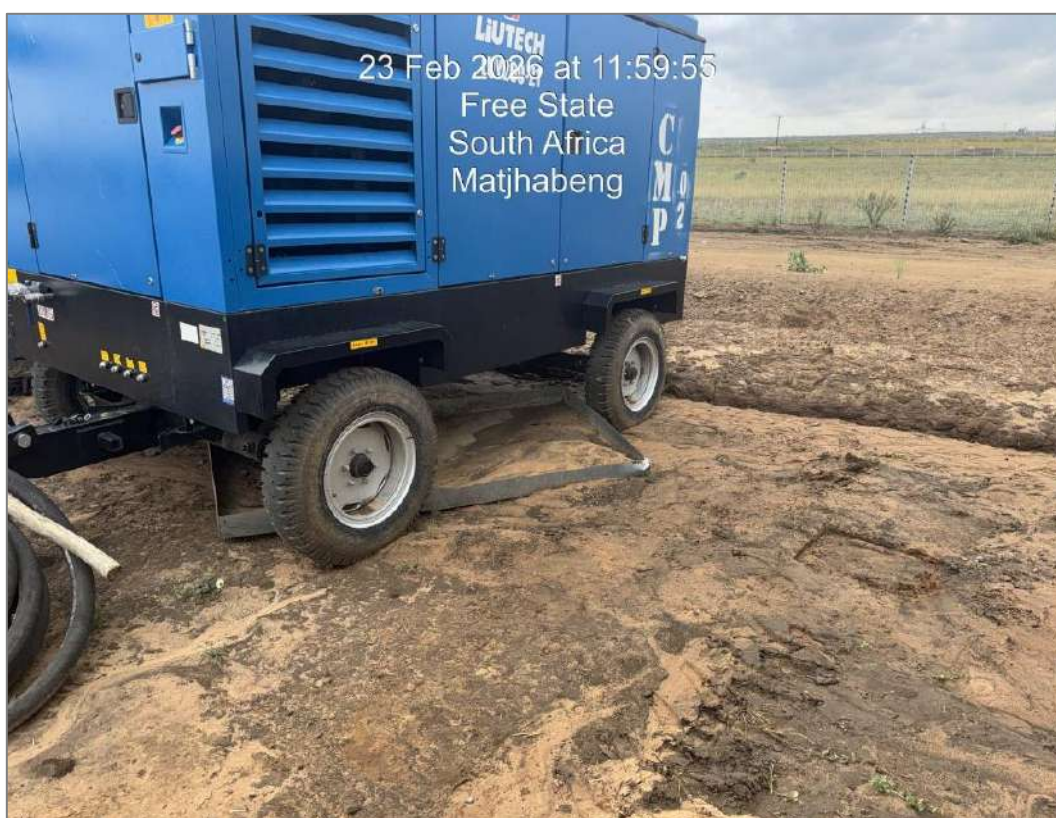


Figure 4: Equipment placed in the stormwater drains



Figure 5: Large pile of wood that is a fire hazard



Figure 6: Alien Vegetation onsite



Figure 7: Erosion onsite

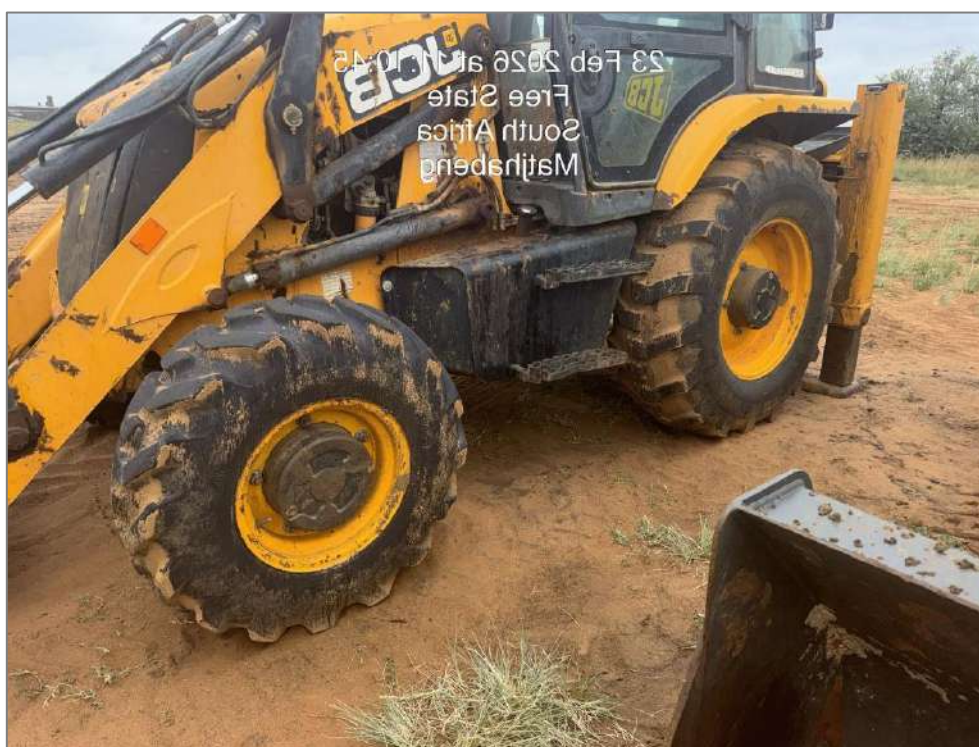


Figure 8: Equipment without Drip trays



Figure 9: Stockpile height exceeding 2m

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MARCH 2026



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:

March 2026

PREPARED BY:

NCC Operations

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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 April 2026

Environmental Control Officer

NCC Operations (Pty) Ltd

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DOCUMENT CONTROL

REPORT TITLE	Monthly ECO Environmental Monitoring Report
PROJECT	Virginia OHPL Line and Switching Station
LOCATION	Free State Province
EA HOLDER	URSA Energy (Pty) Ltd
ECO	NCC Operations (Pty) Ltd
REVISION	00
DATE	03/04/2026

Revision	Date	Description
Rev 00	03/04/2026	First Draft - Internal
Rev 01	TBC	Final - Authority submission

REPORT DISTRIBUTION LIST

Name	Organisation	Issued	Format
Janine Brasington	Red Rocket South Africa (Pty) Ltd	03/04/2026	Electronic
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Maggie Logan	Red Rocket South Africa (Pty) Ltd		Electronic
Director of Compliance	DFFE	TBC	Electronic

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ABBREVIATIONS

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

TBC

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/AM1)
- 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/AM1)

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 Solar Park Switching Station	14/12/16/3/3/2/2099/2	11 September 2023	Terramanzi Group (Pty) Ltd	October 2023
Virginia Solar Park OHPL	14/12/16/3/3/1/2444/AM1	26 June 2023	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 24th of March 2026 after which this report was compiled which serves to document and audit. This report covers the monthly reporting for the month of March 2026.

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.

Company	NCC Operations (Pty) Ltd
Auditor	Jennipher Sakaunda
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Address	26 Bell Close, Westlake Business Park Westlake, 7945
Affiliation	International Association of Impact Assessment South Africa. Environmental Assessment Practitioner Association of South Africa. South African Council of Natural Scientific Professions.
Qualifications	BSc (honors) Environmental Management
Expertise	A detailed CV can be provided on request.

3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (March 2026) 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
- Stringing the overhead lines.

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 24th of March 2026. 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.

Several water damaged monopole concrete slabs had to be removed along the line; these generated a significant amount of rubble. The contractor must ensure this rubble is timely removed and disposed at a registered landfill site.

4.1 Domestic/ General Waste

A total of **11 610 kg** of general waste including **98 kg** of clear vegetation was generated on site in the month of March 2026; **2 333 kg** constituting boxes and wooden pallets were recycled. Waste generated on site also included **3 000 tonnes** of rubble that was 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 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. No hazardous waste was disposed in March 2026. 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 **59 790.71 L** of sewerage waste was generated on site in the month of March 2026. 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.

Mora Ecological Services was appointed by the contractor to clear alien vegetation on the stockpiles. Mora Ecological Services will also be applying herbicides on the areas affected with alien vegetation. The contractor must ensure that all the cleared vegetation is timeously moved to the landsite, to prevent the alien seed from being dispersed.

6.2 Water Management

The contractor abstracted **686 m³** of water from Sluice 16 and about **161 m³** water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The GA allows for abstraction of 43 000m³ 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 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 March 2026 covering the following topics:

- Fuel and Oil Management
- Vehicle and Equipment environmental safety
- Drip Trays and Environmental Compliance
- Road Safety & Site Traffic Management (Onboarding & Environmental Care)
- Proper use of toilets and hygiene
- Use of Designated areas on site
- Sanitation on Site
- Alien Removal and Working Sensitive Areas
- EHSS Specification
- Site Access Control and Smoking Compliance
- Environmental Spillages
- Housekeeping Awareness and clean up

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 March 2026.

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. As the is approaching completion the contract must prepare a rehabilitation plan for approval by the ECO and the ESCOs.

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 March 2026. A register of environmental incidents is attached as **Annexure C**.

14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 24th of March 2026 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:

- The contactor has appointed Mora Ecological Services to clear alien vegetation and apply herbicides.
- Signs of erosion were observed throughout the construction area.
- Rubble from the from the demolished monopole concrete slabs and the works at the switching station was not removed from the construction area (Figure 4).
- Significant clearance of vegetation was done on the wetland at tower 13, disturbing the wetland (Figure 6).
- The access road in a bad condition due to erosion and water ponding.
- Some machines were standing with no drip trays increasing the chances of spills causing soil or water pollution.
- Although some cleaning was done there still overgrown grass at the laydown areas covering material and equipment (Figure 2).
- Water ponding was observed at the switching station area (Figure 3)
- Chemical toilet was placed within 100m of the wetland area.
- Bird nests were noted on the chemical bund at the OHPL laydown area (Figure 7).

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.

- Housekeeping must be done at the laydown areas.
- Enforcement the use of drip trays and issue penalties to uncomplying drivers.
- Move the chemical toilets away from the wetland area.

18.2 Major improvements required.

- Clearance of alien vegetation must continue all affected areas.
- Maintaining the damaged access roads.
- Implement stormwater measures on the entire site.
- Enforcement the use of drip trays and issue penalties to uncomplying drivers.
- Remove the construction rubble from the construction area to the landfill or add another skip at the TSF area.
- Develop a wetland rehabilitation plan to restore the destroyed wetland.
- Implement stormwater management measures.
- The contractor must check if the nests have eggs and ensure that the nests are not disturbed until the eggs hatch.

19 AUDIT SUMMARY

In terms of the findings and results of the **March 2026** 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)	228	9	0	0	52	59	98%
4	EMPr Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2)	179	2	0	0	19	27	99%
Overall total no. conditions		456	12	0	2	108	72	
Audited conditions		912	12	0	-	-	-	(Potential max score)
Overall Compliance Rating Calculation (%)		99%						

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 re-establishment of alien vegetation. The contractor can also extend the use of herbicides to the stockpiles along the line.
- All construction rubble must be removed timeously from construction areas. Installing an additional skip at the switching station will mitigate the risk of rubble being deposited on the ground when the primary skip reaches full capacity.
- 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. Implement penalties for non-compliant drivers will incentivize adherence.
- Housekeeping must be done at the laydown areas.
- Move the chemical toilet away from the wetland.

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'.

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ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

Open Concerns/Complaint

No	Observation date	Concern/Complaint	Suggested Due Date ¹	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 (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/ 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 (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/ 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
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 spillage was left overnight and was only reported to the EO the next morning when the shift began.	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
11/06/2025	Concrete and oil Spillage	Soil pollution	On the 11 th 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 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 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 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/ 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 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 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 (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/ 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
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 thoroughly 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 (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 Vehicles that are constantly breaking down must be moved off site
17/11/2025	Hydraulic oil spillage	Soil pollution	A hydraulic pump of a drilling machine broke its shaft; the machine started to drip oil.	+/-20L (below Section 30 threshold)	The spillage was cleaned, and the contaminated soil was removed to WMC.	Drip tray must be used all the time.

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
23/01/2026	Hydraulic oil spillage	Soil contamination	Approximately 18-20 litres of oil spilled when an excavator was offloaded from a truck at the onboarding area on PV 3. The driver drove to the parking lot and parked the machine and when he got off, he saw that it was spilling oil from the moment it was offloaded from the truck. A drip tray was immediately put a under the machine. He also found out that the hydraulic pipe busted during offloading. Negligence during the offloading process led to the oil spill.	18-20L	A drip tray was placed; however, the drip tray was damaged. The spill was cleaned using spill kits.	Drip tray must be used all the time.
05/02/2026	Hydraulic oil spillage	Soil contamination	The incident occurred as the driver was driving from the quarry to PV3 to dump material. The tipper truck was unable to lift the tipping body and dump the material. When the mechanic was removing the old oil pump and replacing it with a new one, some of the remaining oil in the pipe splashed onto the ground, about 6 litres.	6-8L	Some absorbents were spread on the affected area to absorb the oil.	None
23/02/2026	Hydraulic oil spillage	Soil contamination	A hydraulic hose on a front-end loader burst during operation, resulting in a hydraulic oil spill from the machine. The incident occurred outside the main gate of PV1 and PV2, approximately 80 m west of the main road at Virginia Solar Park. The operator was legally appointed by ML Nkosi to operate the front-end loader and had been on shift for approximately 4 hours at the time of the incident. Upon identifying the leak, the operator isolated the machine and positioned a drip tray beneath it before leaving the site to source the tools and parts required to carry out repairs.	3-5l	The affected area was cordoned off to prevent further disturbance of the contaminated soil. Oil absorbents were immediately spread over the affected area. The absorbent material was	None

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
					collected and placed in a heavy-duty sack. Visibly contaminated soil was excavated and placed into the same sack for disposal. The excavated area was subsequently backfilled and reinstated.	
23/03/2026	Hydraulic Oil Spillage	Soil pollution	At around 11:00 a.m. at PV3, two mechanics arrived to repair an excavator. The mechanics intended to remove the boom-side cylinder and use it as a sample to obtain a replacement. During the removal of the hydraulic cylinder, hydraulic oil was released from the cylinder resulting in a spill of approximately 12 litres onto the ground. Although a drip tray had been placed to contain the oil, it failed to hold the full spill. The spill was reported to the subcontractor Environmental Officer, the spillage was cleaned up as per the spill response plan.	+/- 12L (<i>below Section 30 threshold</i>)	Upon arrival at the incident area, the Environmental Officer immediately implemented the spill response measures using a spill kit. Oil absorbents were applied to the affected area to contain the spill and	The incident occurred due to an excavator breakdown; therefore, no preventative measures could be identified for implementation.

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
					minimise further leaching of oil into the soil. The used absorbents were collected and disposed of in the designated hazardous waste bin. The contaminated soil was then removed and disposed of appropriately, after which the affected area was backfilled with clean soil.	

ANNEXURE D – PHOTOGRAPHS



Figure 1: Cleaned section at the laydown area

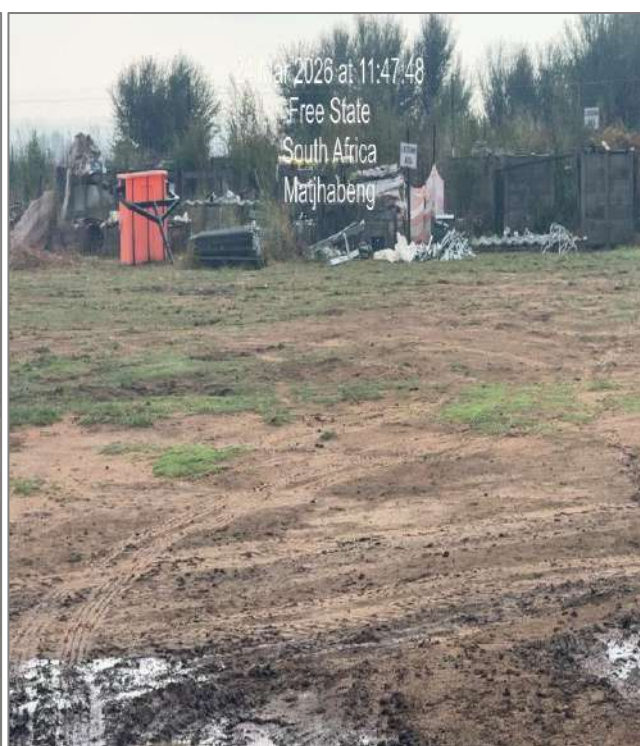


Figure 2: overgrown grass at the layout



Figure 3: Water ponding and mud at the switching station



Figure 4: Construction Rubble on the line and switching station.



Figure 5: Alien Vegetation on the stockpiles.

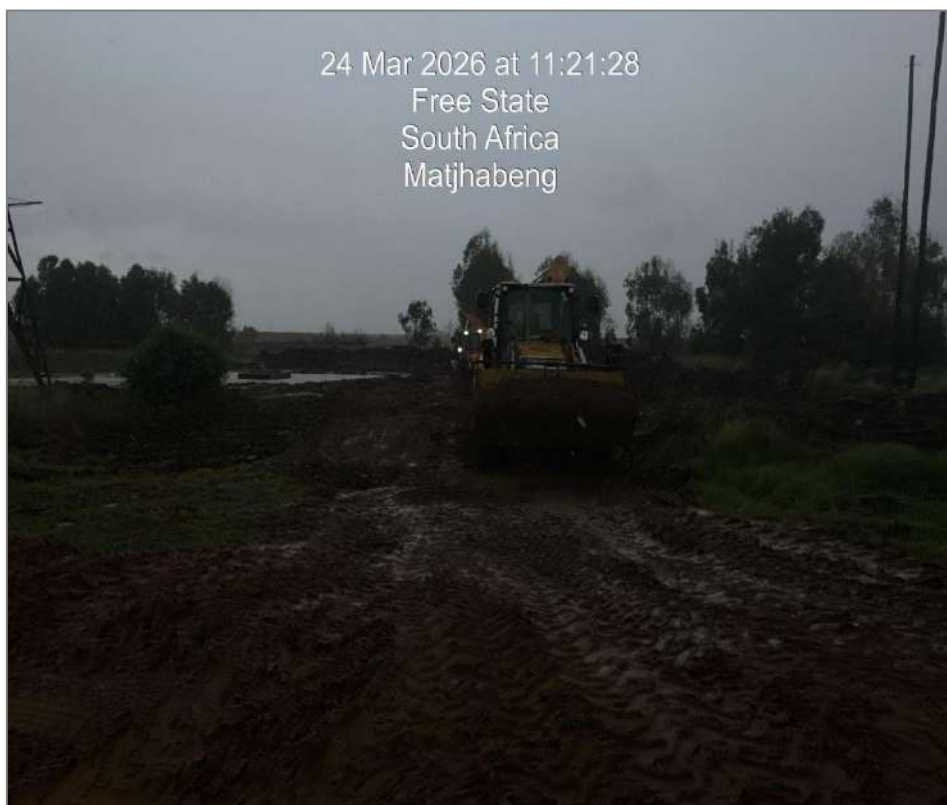


Figure 6: Significant transformation of the wetland area.



Figure 7: Nests in the chemical bund.



Figure 8: Stringing of the overhead powerlines



Figure 9: Clean waste area.

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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:

March 2026

PREPARED BY:

NCC Operations

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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 April 2026

Environmental Control Officer

NCC Operations (Pty) Ltd

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DOCUMENT CONTROL

REPORT TITLE	Monthly ECO Environmental Monitoring Report
PROJECT	Virginia Solar PV 1, 2, 3
LOCATION	Free State Province
EA HOLDER	URSA Energy (Pty) Ltd
ECO	NCC Operations (Pty) Ltd
REVISION	00
DATE	03/04/2026

Revision	Date	Description
Rev 00	03/04/2026	First Draft - Internal
Rev 01	TBC	Final - Authority submission

REPORT DISTRIBUTION LIST

Name	Organisation	Issued	Format
Janine Brasington	Red Rocket South Africa (Pty) Ltd	03/04/2026	Electronic
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Director of Compliance	DFFE	TBC	Electronic

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ABBREVIATIONS

BAR	Basic Assessment Report
CA	Competent Authority
DEA	Department of Environmental Affairs (now DFFE)
DFFE	Department of Forestry, Fisheries, and the Environment
DWS	Department of Water and Sanitation
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
EO	Environmental Officer (Contractor)
ER	Employer's Representative
ESCO	Environmental Site Compliance Officer
kV	Kilovolt
MVA	Megavolt Amperes
MW	Megawatt
NCC	NCC Operations
NCR	Non-Compliance Report
NEMA	National Environmental Management Act (No. 107 of 1998)
NWA	National Water Act (No. 36 of 1998)
OHPL	Overhead Power Line
SDC	Safe Disposal Certificate
SHE	Safety, Health, and Environment
SS	Substation
TBC	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/AM2)
- 3) Virginia 3 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2101/AM2)

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	11 September 2023	Terramanzi Group (Pty) Ltd	October 2023
Virginia 2 Solar Park	14/12/16/3/3/2/2100/A M2	24 August 2023	Terramanzi Group (Pty) Ltd	October 2023
Virginia 3 Solar Park	14/12/16/3/3/2/2101/A M2	07 September 2023	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 24th of March 2026 after which this report was compiled which serves to document and audit. This report covers the monthly reporting for the month of March 2026.

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.

Company	NCC Operations (Pty) Ltd
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Address	26 Bell Close, Westlake Business Park Westlake, 7945
Affiliation	International Association of Impact Assessment South Africa. Environmental Assessment Practitioner Association of South Africa. South African Council of Natural Scientific Professions.
Qualifications	BSc (honors) Environmental Management
Expertise	A detailed CV can be provided on request.

3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (March 2026) 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 24th of March 2026 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 for recycling. The waste station includes a bund where waste will be stored and various compartments where waste is sorted into. Recyclables are transported to Mpact for recycling.

4.1 Domestic/ General Waste

A total of **11 610 kg** of general waste including **98 kg** of clear vegetation was generated on site in the month of March 2026; **2 333 kg** constituting boxes and wooden pallets were recycled. Waste generated on site also included **3 000 tonnes** of rubble that 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 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 March 2026. 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 to the ground.

4.3 Wastewater

Approximately **59 790.71 L** of sewerage waste was generated on site in the month of March 2026. 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.

Mora Ecological Services was appointed by the contractor to clear alien vegetation on both the stockpiles and the solar fields. Mora Ecological Services will also be applying herbicides on the areas affected with alien vegetation. The contractor must ensure that all the cleared vegetation is timeously moved to the landsite, to prevent the alien seed from being dispersed.

6.2 Water Management

The contractor has abstracted **686 m³** of water from Sluice 16 and about **161 m³** water were abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The GA allows for abstraction of 43 000m³ annually, the contractor must ensure water abstraction does not exceed the licenced volumes.

6.3 Soil Management

Cleared topsoil must be adequately protected to prevent erosion and the establishment of alien vegetation. Alien plant species have already established on the stockpile areas and must be removed as a matter of priority. Significant soil erosion was observed within the PV areas and along the access routes. The erosion control measures prescribed in the Stormwater Management Plan must be implemented without delay to prevent further soil loss and to protect onsite infrastructure. All eroded areas must be backfilled and rehabilitated to restore the affected surfaces and prevent recurring erosion.

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 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 area 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 March 2026 covering the following topics:

- Fuel and Oil Management
- Vehicle and Equipment environmental safety
- Drip Trays and Environmental Compliance
- Road Safety & Site Traffic Management (Onboarding & Environmental Care)
- Proper use of toilets and hygiene
- Use of Designated areas on site
- Sanitation on Site
- Alien Removal and Working Sensitive Areas
- EHSS Specification
- Site Access Control and Smoking Compliance
- Environmental Spillages
- Housekeeping Awareness and clean up

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 March 2026

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 March 2026. A register of environmental incidents is attached as **Annexure C**.

14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 24th of March 2026 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:

- The contactor has appointed Mora Ecological Services to clear alien vegetation and apply herbicides.
- Access road in bad condition due to erosion and water ponding (Figure 1).
- Majority of machines were standing with no drip trays increasing the chances of spillages causing soil and water pollution (Figure 9).
- Erosion damage was observed on the internal access roads and PV areas (Figure 7).
- Large stacks of cleared trees at V3 present a fire hazard.
- Large quantities of waste from the unboxing of the solar panels were found on the solar fields (Figure 3).

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.

- Use drip trays on all standing equipment.
- Remove and donate all the cleared trees.
- Allocate more resources towards housekeeping.

18.2 Major improvements required.

- Clearance of alien vegetation must be done on all affected areas.
- Road maintenance must be done.
- Stormwater measures must be implemented.

19 AUDIT SUMMARY

In terms of the findings and results of the **March 2026** ECO audit, the project achieved an overall **97.26 % 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	20	0	0	16	27	(96%)
5	EMPr Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)	256	222	0	0	17	25	(96%)
6	EMPr Virginia 3 Solar Park (DFFE REF NO: 14/12/16/3/3/2/2101)	231	14	0	0	44	34	(97%)
Overall total no. conditions		816	59	0	3	137	92	
Audited conditions		1632	59	0	-	-	-	(Potential max score)
Overall Compliance Rating Calculation (%)		97.26%						

20 RECOMMENDATIONS

Based on the findings identified the following is recommended:

- Alien vegetation clearance must continue onsite.
- All equipment must be equipped with a drip tray.
- 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.
- Remove and donate all the cleared trees.
- More resources must be allocated towards housekeeping.

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.

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ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

Open Concerns/Complaint

No	Observation date	Concern/Complaint	Suggested Due Date ¹	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 (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/ 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 (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/ 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
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 (below 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 contaminated soil was collected into the bags and taken to site waste management area.	4 litres (below 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.
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 (below 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.

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 th 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 (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 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 (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.	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 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 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 (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
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	+/- 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.

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 proceed with work, and they properly cleaned the spillage, and the contaminated soil was collected into			
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 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.

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
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 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 (<i>below Section 30 threshold</i>)	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/ 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
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 (below Section 30 threshold)	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.
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 (below Section 30 threshold)	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/ 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
17/11/2025	Hydraulic oil spillage	oil Soil pollution	A hydraulic pump of a drilling machine broke its shaft; the machine started to drip some oil.	+/-20L (below 30 threshold)	The spillage was cleaned, and the contaminated soil was removed to WMC.	Drip tray must be used all the time.
23/01/2026	Hydraulic oil spillage	oil Soil contamination	Approximately 18-20 litres of oil spilled when an excavator was offloaded from a truck at the onboarding area on PV 3. The driver drove to the parking lot and parked the machine and when he got off, he saw that it was spilling oil from the moment it was offloaded from the truck. A drip tray was immediately put a under the machine. He also found out that the hydraulic pipe busted during offloading. Negligence during the offloading process led to the oil spill.	18-20L	A drip tray was placed; however, the drip tray was damaged. The spill was cleaned using spill kits.	Drip tray must be used all the time.
05/02/2026	Hydraulic oil spillage	oil Soil contamination	The incident occurred as the driver was driving from the quarry to PV3 to dump material. The tipper truck was unable to lift the tipping body and dump the material. When the mechanic was removing the old oil pump and replacing it with a new one, some of the remaining oil in the pipe splashed onto the ground, about 6 litres.	6-8L	Some absorbents were spread on the affected area to absorb the oil.	None
23/02/2026	Hydraulic oil spillage	oil Soil contamination	A hydraulic hose on a front-end loader burst during operation, resulting in a hydraulic oil spill from the machine. The incident occurred outside the main gate of PV1 and PV2, approximately 80 m west of the main road at Virginia Solar Park. The operator was legally appointed by ML Nkosi to operate the front-end loader and had been on shift for approximately 4	3-5l (below 30 threshold)	The affected area was cordoned off to prevent further disturbance of the contaminated soil. Oil absorbents were immediately spread over the affected area. The	None

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
			hours at the time of the incident. Upon identifying the leak, the operator isolated the machine and positioned a drip tray beneath it before leaving the site to source the tools and parts required to carry out repairs.		absorbent material was collected and placed in a heavy-duty sack. Visibly contaminated soil was excavated and placed into the same sack for disposal. The excavated area was subsequently backfilled and reinstated.	
23/03/2026	Hydraulic Oil Spillage	Soil pollution	At around 11:00 a.m. at PV3, two mechanics arrived to repair an excavator. The mechanics intended to remove the boom-side cylinder and use it as a sample to obtain a replacement. During the removal of the hydraulic cylinder, hydraulic oil was released from the cylinder resulting in a spill of approximately 12 litres onto the ground. Although a drip tray had been placed to contain the oil, it failed to hold the full spill. The spill was reported to the subcontractor Environmental Officer, the spillage was cleaned up as per the spill response plan.	+/- 12L (below Section 30 threshold)	Upon arrival at the incident area, the Environmental Officer immediately implemented the spill response measures using a spill kit. Oil absorbents were applied to the affected area to contain the spill and minimise further leaching of oil into the soil. The used absorbents were collected and disposed of in the designated hazardous waste bin. The contaminated soil was then removed and disposed of appropriately, after which the affected area was backfilled with clean soil.	The incident occurred due to an excavator breakdown; therefore, no preventative measures could be identified for implementation.

ANNEXURE D – PHOTOGRAPHS



Figure 1: Condition of the access roads.



Figure 2: Water ponding



Figure 3: boxes on the solar field.

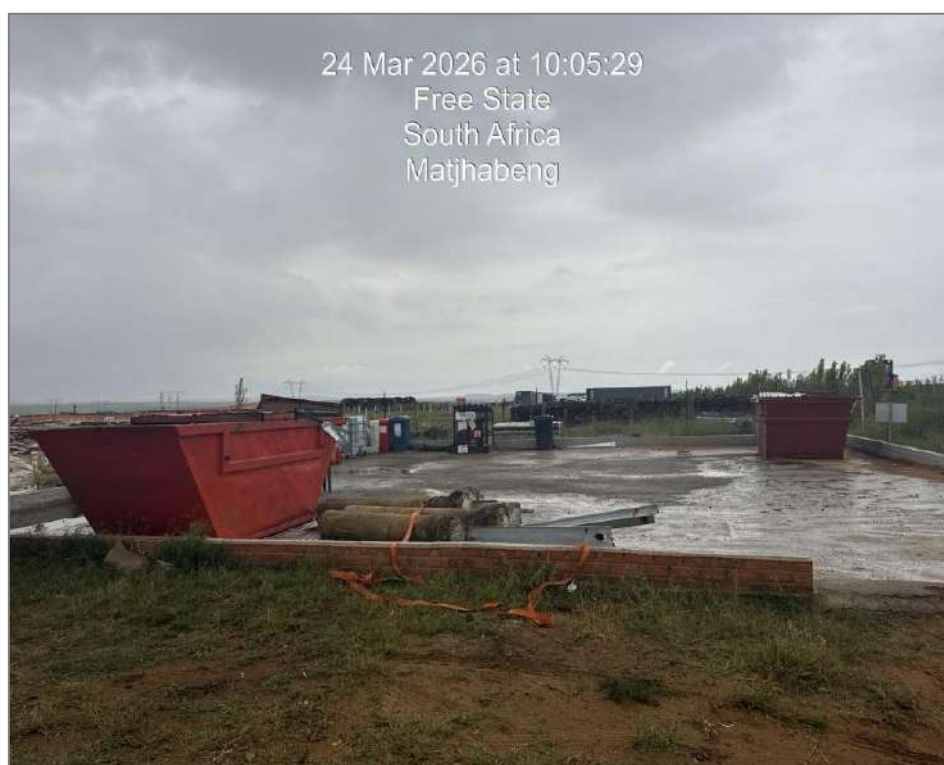


Figure 4: Clean waste area



Figure 5: Alien vegetation



Figure 6 Cleared Alien Vegetation



Figure 7 Erosion onsite



Figure 8: Erosion control measure



Figure 9: Equipment without Drip trays

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