

ECO Reports

2024

SEPTEMBER 2024



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.

September 2024

PREPARED FOR:

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

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

DATED:

September 2024

PREPARED BY:

NCC Operations

T • 021 702 2884

E • info@ncc-group.co.za

DECLARATION OF INDEPENDENCE

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

Signed:

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

Jennipher Sakaunda

02 October 2024

Environmental Control Officer

NCC Operations (Pty) Ltd

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REPORT TITLE	Monthly ECO Environmental Monitoring Report
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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 Environmental Services
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
WEF	Wind Energy Facility

1 INTRODUCTION

1.1 Background

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

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

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

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

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

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

construction activities and ensure that the mitigation measures of the EMPr¹ and Environmental Authorisations (EA) are implemented. This report also includes an audit checklist for the VSP EA as follows:

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

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

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

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

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

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

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

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

In addition, the ESCO will:

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

1.2 Audit Scope and Purpose

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

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

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

1.3 Monitoring Frequency and Reporting

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 12th of September 2024 after which this report was compiled which serves to document and record the audit proceedings and observations and provide recommendations and conclusions in relation to the audit. This report covers the monthly reporting for the month of September 2024.

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 13 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
Tel	+27 21 702 2884
Mobile	+27 69 510 7630
Email	jenniphers@ncc-group.co.za
Address	26 Bell Close, Westlake Business Park Westlake, 7945
Affiliation	International Association of Impact Assessment South Africa (IAIASa)
Qualifications	BSc (honors)
Expertise	A detailed CV can be provided on request

3 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (September 2024) included the following:

- Pre-works/Geotechnical surveys
- Plant search and rescue
- A temporary water storage structure has been placed on site as the borehole is approximately 4km from the site.

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 ESCO. The September Audit was undertaken on the 22nd of September 2024. Audit tables/checklists are available on request. The ECO undertakes external monthly audits.

4 WASTE MANAGEMENT

The contractor has not established site and there is very little activity onsite, waste generated by office personal is managed by the facility owner which goes into the municipal waste stream.

4.1 Domestic/ General Waste

No domestic wastes have been reported as disposed during September 2024..

4.2 Hazardous waste

No hazardous wastes have been reported as disposed during September 2024.

4.3 Wastewater

No waste water have been reported as disposed during September 2024.

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.

6 ENVIRONMENTAL CONSERVATION

6.1 Conservation of Flora and Fauna

A permit to clear the site and relocate species of concern was received from Department of Economic, Small Business Development, Tourism and Environmental Affairs. The permit with ref no. 202306000012649 was issued on 08/06/2023 to pluck protected and unprotected flora. Search and rescue of protected plants was executed and completed in September 2024. Rescued plants have been replanted on the farm where they will not be harmed by construction activities and where it was deemed suitable habitat for those species occurred. The locations of the rescued plants are known to the ESCOS and kept on file.

6.2 Water Management

The applicant has established a water tank onsite. A Water use licence ("WUL - 21/2/2/C742/5/1") was issued on 29 September 2023. The application was for the abstraction **10 000m³** on a Portion of the farm Blomskraal 216 (Venterburg RD) to meet the water requirements during the construction and operational phases of the VSP.

Refer to photographic record in **Annexure D** for Water tank that was established onsite

6.3 Soil Management

N/A

7 INFRASTRUCTURE MANAGEMENT

7.1 Access Roads

N/A. Access Roads have not been established onsite.

7.2 Fences, Gates, and Barricading

N/A.

7.3 Buildings and Structures

N/A.

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

N/A. Toolbox talks were not conducted for the month of September 2024 .

10 HERITAGE

No heritage resources or artefacts reported during this reporting period.

11 WARNING & NCRS

No non-conformance reports (“**NCRs**”) were noted or issued by the ESCO during this reporting period.

A template of the ECO NCR register is attached as **Annexure B**.

12 REHABILITATION

No rehabilitation works have commenced during this period, further rehabilitation is expected to occur on the project as 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 were observed during this period. A template of the ECO incident register is attached as **Annexure C**.

14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 12th of September 2024 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. Stormwater and erosion control and management.
 - viii. Environmental Awareness.
 - ix. Record-keeping and document control.
- Documentation review. This included:
 - i. A review of the EAs, EMPs and where applicable, method statements.
 - ii. A review of previous audit reports, records, observations, and findings.
 - iii. A review of any remedial and/or protective measures implemented.
 - iv. Identification, if applicable, any gaps requiring action and/or rectification.
- Audit Report compilation. This included:
 - i. Recording any observations and findings identified during the audit.
 - ii. Providing recommendations relating to improvement or non-compliance, if and where applicable.

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 **(these are available upon request)**.

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

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

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

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

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 EMPrs.
- 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 ("**ESCO**") which also includes consultation and communication with the EA holder and competent authority ("**CA**") 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. At this early stage during the construction phase of the VSP and associated infrastructure most of the aspects are not applicable including closure and rehabilitation. The following non compliances were noted onsite:

- Cement was being mixed on the ground.
- There are no signs onsite.
- Dust is not managed on the access roads.

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

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

18.1 Minor improvements required.

None.

18.2 Major improvements required.

None.

19 AUDIT SUMMARY

In terms of the findings and results of the August 2024 ECO audit, the project achieved an overall **98%** compliance rating with the conditions of the EAs and EMPs.

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

Scoring symbol	✓✓	✓	✘	-	-	878 Achieved score)
Total score	843	13	0	-	-	
Overall Compliance Rating Calculation (%)	$\{[(852+13+0)] / 878\} \times 100$					98%

20 RECOMMENDATIONS

Based on the noncompliance identified following is recommended:

Cement must be mixed concrete slab or on an iron sheet. Slipped cement must be removed and be disposed properly.

Dust suppression done on the construction sites and the access roads at least 3 times day or as required.

Signages put be displayed on the construction area. Access roads and site office.

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 that reads 'Sakaunda'.

Sakaunda Jennipher
Environmental Control Officer
NCC Operations (Pty) Ltd

M -069 510 7630

E · jenniphers@ncc-group.co.za

REVIEWED BY:

A handwritten signature in black ink that reads 'Trevor O'Donoghue'.

Trevor O'Donoghue
Service Line Manager
NCC Operations (Pty) Ltd

M – 084 465 4058

E – trevorOD@ncc-group.co.za

ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

Open Concerns/Complaint

No	Observation date	Concern/Complaint	Suggested Due Date ¹	Proposed Corrective Action	Status	Closure status

¹The concerns register is updated once the ECO is present on site.

Closed Concerns

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

ANNEXURE B - NCR REGISTER

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

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
			N/A			

ANNEXURE D – PHOTOGRAPHS



Figure 1: Concrete being mixed on the ground



Figure 2: Water tanker onsite.



Figure 3: Material onsite.

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OCTOBER 2024



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.

October 2024

PREPARED FOR:

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

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

DATED:

October 2024

PREPARED BY:

NCC Operations

T • 021 702 2884

E • info@ncc-group.co.za

DECLARATION OF INDEPENDENCE

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

Signed:

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

Jennipher Sakaunda

05 November 2024

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 and Associated Infrastructure
LOCATION	Free State Province
EA HOLDER	URSA Energy (Pty) Ltd
ECO	NCC Operations (Pty) Ltd
REVISION	00
DATE	5/11/2024

Revision	Date	Description
Rev 00	05/11/2024	First Draft - Internal
Rev 01		Final - Authority submission

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Director of Compliance	DFFE		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 Environmental Services
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
WEF	Wind Energy Facility

1 INTRODUCTION

1.1 Background

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

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

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

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

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

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

construction activities and ensure that the mitigation measures of the EMPr¹ and Environmental Authorisations (EA) are implemented. This report also includes an audit checklist for the VSP EA as follows:

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

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

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

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

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

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

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

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

In addition, the ESCO will:

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

1.2 Audit Scope and Purpose.

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

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

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

1.3 Monitoring Frequency and Reporting.

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 22nd of October 2024 after which this report was compiled which serves to document and

record the audit proceedings and observations and provide recommendations and conclusions in relation to the audit. This report covers the monthly reporting for the month of October 2024.

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 13 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
Tel	+27 21 702 2884
Mobile	+27 69 510 7630
Email	jenniphers@ncc-group.co.za
Address	26 Bell Close, Westlake Business Park Westlake, 7945
Affiliation	International Association of Impact Assessment South Africa (IAIASa). 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 (October 2024) included the following:

- Pull out tests (Concrete Casting, Axial and Lateral).
- Cut and Fill 200m Platform
- Site Establishment

3.1 General Outstanding matters

Any major outstanding matters are to be recorded and summarised in the Concerns Register (**Annexure A**).

The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

3.2 Audits (Internal and External)

Internal audits are undertaken monthly by the ESCO. The October r Audit was undertaken on the 22nd of October 2024. Audit tables/checklists are available on request. 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.

4.1 Domestic/ General Waste

Approximately 1400 kg of waste was generated on site in the month of October 2024. General waste bins are provided at the temporary site camp. A service provider was to dispose general waste at Matjhabeng Local Municipality waste disposal site-Licence number: No. B33/2/340/21/P8 16/2/7/C404/D2/Z1/P367. Proof of disposal is available on request.

4.2 Hazardous waste

No hazardous wastes have been reported as disposed during October 2024.

4.3 Wastewater

Approximately 800 litres of sewer were generated on site in the month of October 2024. Chemical toilets are provided onsite. The Appointed Service Provider removes sewage and dispose at Matjhabeng Local Municipality 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.

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

6 ENVIRONMENTAL CONSERVATION

6.1 Conservation of Flora and Fauna

A permit to clear the site and relocate species of concern was received from Department of Economic, Small Business Development, Tourism and Environmental Affairs. The permit with ref no. 202306000012649 was issued on 08/06/2023 to pluck protected and unprotected flora. Search and rescue of protected plants was executed and completed in September 2024. Rescued plants have been replanted on the farm where they will not be harmed by construction activities and where it was deemed suitable habitat for those species occurred. The locations of the rescued plants are known to the ESCOS and kept on file.

6.2 Water Management

The application is for the abstraction 43 800m³/year of groundwater from an existing borehole P4 to meet the water requirements during the construction and operational phase of the Virginia Solar Park. The GA was also granted for the storage of 10 000m³/year of water in a freshwater storage structure. Approximately 143 Cubic Metres of water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The contactor must ensure water abstraction does not exceed the licenced volumes.

6.3 Soil Management

N/A

7 INFRASTRUCTURE MANAGEMENT

7.1 Access Roads

The project team is using existing farm roads for current construction activities until such time as the project access roads and internal roads have been constructed. The existing access Roads must be maintained. The access road has been eroded. Refer to **Annexure D** for photographs.

7.2 Fences, Gates, and Barricading

N/A.

7.3 Buildings and Structures

N/A.

8 SOCIAL RESPONSIBILITY

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

9 ENVIRONMENTAL AWARENESS AND TRAINING

The contractor has undertaken Toolbox talks for the month of **October 2024** covering the following topics:

- Storage & Segregation of Waste
- Spill Kit
- Snake Awareness
- Waste management

10 HERITAGE

No heritage resources or artefacts reported during this reporting period.

11 WARNING & NCRS

No non-conformance reports (“**NCRs**”) were noted or issued by the ESCO during this reporting period.

A template of the ECO NCR register is attached as **Annexure B**.

12 REHABILITATION

No rehabilitation works have commenced during this period, further rehabilitation is expected to occur on the project as 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 were observed during this period. A template of the ECO incident register is attached as **Annexure C**.

14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 22nd of October 2024 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. Stormwater and erosion control and management.
 - viii. Environmental Awareness.
 - ix. Record-keeping and document control.
- Documentation review. This included:
 - i. A review of the EAs, EMPs and where applicable, method statements.
 - ii. A review of previous audit reports, records, observations, and findings.
 - iii. A review of any remedial and/or protective measures implemented.
 - iv. Identification, if applicable, any gaps requiring action and/or rectification.
- Audit Report compilation. This included:
 - i. Recording any observations and findings identified during the audit.
 - ii. Providing recommendations relating to improvement or non-compliance, if and where applicable.

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 **(these are available upon request)**.

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

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

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

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

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 EMPrs.
- 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 ("**ESCO**") which also includes consultation and communication with the EA holder and competent authority ("**CA**") 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. At this early stage during the construction phase of the VSP and associated infrastructure most of the aspects are not applicable including closure and rehabilitation. The following non compliances were noted onsite:

- Sensitive area although marked are not demarcated
- Erosion on the access road.
- Water ponding on the access roads.

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

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

18.1 Minor improvements required.

None.

18.2 Major improvements required.

None.

19 AUDIT SUMMARY

In terms of the findings and results of the August 2024 ECO audit, the project achieved an overall **98%** compliance rating with the conditions of the EAs and EMPrs.

Virginia, Solar Park 1,2,3, Virginia Solar Park and Virginia OHPL, Free State Province							
No.	Audit criteria	Compliant (C)	Partially Compliant (PC)	Non-Compliant (NC)	Not Applicable / Not Audited (NA)	Normative (info)	
1	Environmental Authorisation for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)	39	0	3	7	0 (100%)	
2	Environmental Authorisation for Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)	32	1	3	5	0 (99.8%)	
3	Environmental Authorisation for Virginia 3 Solar Park (DFFE REF NO: 14/12/16/3/3/2/2101)	35	1	3	0	0 (99%)	
4	Environmental Authorisation for Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2)	41	0	0	7	1 (99%)	
5	Environmental Authorisation for Virginia Solar Park OHPL (DFFE REF NO: 14/12/16/3/3/1/2444)	38	2	0	5	0 (95%)	
6	EMPr for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)	60	1	0	300	0 (99%)	
7	EMPr Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)	50	3	0	321	0 (99%)	
8	EMPr Virginia 3 Solar Park (DFFE REF NO: 14/12/16/3/3/2/2101)	10	1	0	97	0 (99%)	
9	EMPr Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2)	60	1	0	300	0 (99%)	
10	EMPr Virginia Solar Park OHPL (DFFE REF NO: 14/12/16/3/3/1/2444)	50	3	0	321	0 (99%)	
Overall total no. conditions		426	13	0	1362	1 1802	
Audited conditions		426	13	0	-	- 493 (Potential max score)	
Scoring symbol		✓✓	✓	x	-	-	
Total score		843	13	0	-	- 878 Achieved score)	
Overall Compliance Rating Calculation (%)		$\{[(852+13+0)] / 878\} \times 100$					98%

20 RECOMMENDATIONS

Based on the noncompliance identified following is recommended:

- The sensitive areas must be demarcated.
- V-drains must be opened on the access roads to prevent water ponding.
- The access road must be regraded, and the gullies must be filled up.
- The contractor must ensure the service provider for disposing sewer is licenced to offer sewer disposal services.

21 CONCLUSION

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

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

PREPARED BY:

A handwritten signature in black ink, appearing to read 'Sakaunda', is centered below the 'PREPARED BY:' heading.

Sakaunda Jennipher
Environmental Control Officer
NCC Operations (Pty) Ltd
M · 069 510 7630
E · jenniphers@ncc-group.co.za

REVIEWED BY:

A handwritten signature in black ink, appearing to read 'Trevor O'Donoghue', is centered below the 'REVIEWED BY:' heading. The signature is enclosed in a faint rectangular border.

Trevor O'Donoghue
Service Line Manager
NCC Operations (Pty) Ltd
M – 084 465 4058
E – trevorOD@ncc-group.co.za

ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

Open Concerns/Complaint

No	Observation date	Concern/Complaint	Suggested Due Date ¹	Proposed Corrective Action	Status	Closure status

¹The concerns register is updated once the ECO is present on site.

Closed Concerns

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

ANNEXURE B - NCR REGISTER

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

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
			N/A			

ANNEXURE D – PHOTOGRAPHS



Figure 1: Erosion on the access roads



Figure 2: The identified Sensitive that must be demarcated.



Figure 3: Bins onsite



Figure 4: Water ponding on the access roads

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NOVEMBER 2024



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.

November 2024

PREPARED FOR:

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

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

DATED:

November 2024

PREPARED BY:

NCC Operations

T • 021 702 2884

E • info@ncc-group.co.za

DECLARATION OF INDEPENDENCE

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

Signed:

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

Jennipher Sakaunda

05 December 2024

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 Environmental Services
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
WEF	Wind Energy Facility

1 INTRODUCTION

1.1 Background

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

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

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

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

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

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

construction activities and ensure that the mitigation measures of the EMPr¹ and Environmental Authorisations (EA) are implemented. This report also includes an audit checklist for the VSP EA as follows:

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

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

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

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

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

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

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

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

In addition, the ESCO will:

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

1.2 Audit Scope and Purpose.

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

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

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

1.3 Monitoring Frequency and Reporting.

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 25th of November 2024 after which this report was compiled which serves to document and

record the audit proceedings and observations and provide recommendations and conclusions in relation to the audit. This report covers the monthly reporting for the month of November 2024.

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 13 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
Tel	+27 21 702 2884
Mobile	+27 69 510 7630
Email	jenniphers@ncc-group.co.za
Address	26 Bell Close, Westlake Business Park Westlake, 7945
Affiliation	International Association of Impact Assessment South Africa (IAIASa). 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 (November 2024) included the following:

- Pull out tests (Concrete Casting, Axial and Lateral).
- Fencing
- Site Establishment
- Demarcation of sensitive sites
- Establishing the access roads

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 ESCO. The November Audit was undertaken on the 25th of November 2024. Audit tables/checklists are available on request. 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.

4.1 Domestic/ General Waste

Approximately 1050 kg of waste was generated on site in the month of November 2024. General waste bins are provided at the temporary site camp. The service providers dispose the general waste at Matjhabeng Local Municipality waste disposal site-Licence number: No. B33/2/340/21/P8 16/2/7/C404/D2/Z1/P367. Proof of disposal is available on request.

4.2 Hazardous waste

No hazardous wastes have been reported as disposed during November 2024.

4.3 Wastewater

Approximately 7200 litres of sewer were generated on site in the month of November 2024. Chemical toilets are provided onsite. The Appointed Service Provider removes sewage and dispose at Matjhabeng Local Municipality 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.

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

6 ENVIRONMENTAL CONSERVATION

6.1 Conservation of Flora and Fauna

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

6.2 Water Management

The application is for the abstraction 43 800m³/year of groundwater from an existing borehole P4 to meet the water requirements during the construction and operational phase of the Virginia Solar Park. The GA was also granted for the storage of 10 000m³/year of water in a freshwater storage structure. Approximately 1902 Cubic Metres of water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The contractor must ensure water abstraction does not exceed the licenced volumes.

6.3 Soil Management

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

7 INFRASTRUCTURE MANAGEMENT

7.1 Access Roads

The project team is using existing farm roads for current construction activities until such time as the project access roads and internal roads have been constructed. The existing access Roads must be maintained. The access road has been eroded. Refer to **Annexure D** for photographs.

7.2 Fences, Gates, and Barricading

N/A.

7.3 Buildings and Structures

N/A.

8 SOCIAL RESPONSIBILITY

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

9 ENVIRONMENTAL AWARENESS AND TRAINING

The contractor has undertaken Toolbox talks for the month of **November 2024** covering the following topics:

- Storage & Segregation of Waste
- Topsoil management
- Concrete waste management
- Extreme heat
- Environmental and social management.
- Wildlife management

10 HERITAGE

No heritage resources or artefacts reported during this reporting period. The contractor must ensure that a 32m buffer is left between the graves and the stockpiles near the access gate. Refer to **Annexure D** for the photographs.

11 WARNING & NCRS

A non-conformance reports (“**NCRs**”) was issued by the ESCO during the November reporting period for failure to provide adequate ablution facilities by the contractor on the 26th of November 2024. Based on the report by the ESC the TSF area had one VIP toilet for 45 employees, the POT testing Team working in V3 were without sanitation.

12 REHABILITATION

No rehabilitation works have commenced during this period, further rehabilitation is expected to occur on the project as 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 were observed during this period. A template of the ECO incident register is attached as **Annexure C**.

14 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 25th of November 2024 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. Stormwater and erosion control and management.
 - viii. Environmental Awareness.
 - ix. Record-keeping and document control.
- Documentation review. This included:
 - i. A review of the EAs, EMPs and where applicable, method statements.
 - ii. A review of previous audit reports, records, observations, and findings.
 - iii. A review of any remedial and/or protective measures implemented.
 - iv. Identification, if applicable, any gaps requiring action and/or rectification.
- Audit Report compilation. This included:
 - i. Recording any observations and findings identified during the audit.
 - ii. Providing recommendations relating to improvement or non-compliance, if and where applicable.

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 **(these are available upon request)**.

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

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

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

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

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 EMPrs.
- 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 ("**ESCO**") which also includes consultation and communication with the EA holder and competent authority ("**CA**") 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. At this early stage during the construction phase of the VSP and associated infrastructure most of the aspects are not applicable including closure and rehabilitation. The following non compliances were noted onsite:

- Oil spillages
- Dirty toilets
- Erosion on the access road.
- Water ponding on the access roads.

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

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

18.1 Minor improvements required.

None.

18.2 Major improvements required.

Sensitive areas were demarcated

19 AUDIT SUMMARY

In terms of the findings and results of the August 2024 ECO audit, the project achieved an overall **98%** compliance rating with the conditions of the EAs and EMPrs.

Virginia, Solar Park 1,2,3, Virginia Solar Park and Virginia OHPL, Free State Province							
No.	Audit criteria	Compliant (C)	Partially Compliant (PC)	Non-Compliant (NC)	Not Applicable / Not Audited (NA)	Normative (info)	
1	Environmental Authorisation for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)	39	0	3	7	0 (100%)	
2	Environmental Authorisation for Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)	32	1	3	5	0 (99.8%)	
3	Environmental Authorisation for Virginia 3 Solar Park (DFFE REF NO: 14/12/16/3/3/2/2101)	35	1	3	0	0 (99%)	
4	Environmental Authorisation for Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2)	41	0	0	7	1 (99%)	
5	Environmental Authorisation for Virginia Solar Park OHPL (DFFE REF NO: 14/12/16/3/3/1/2444)	38	2	0	5	0 (95%)	
6	EMPr for Virginia 1 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2099/1)	60	1	0	300	0 (99%)	
7	EMPr Virginia 2 Solar Park (DFFE Ref No: 14/12/16/3/3/2/2100)	50	3	0	321	0 (99%)	
8	EMPr Virginia 3 Solar Park (DFFE REF NO: 14/12/16/3/3/2/2101)	10	1	0	97	0 (99%)	
9	EMPr Virginia Solar Park Switching Station (DFFE REF NO: 14/12/16/3/3/2/2099/2)	60	1	0	300	0 (99%)	
10	EMPr Virginia Solar Park OHPL (DFFE REF NO: 14/12/16/3/3/1/2444)	50	3	0	321	0 (99%)	
Overall total no. conditions		426	13	0	1362	1 1802	
Audited conditions		426	13	0	-	- 493 (Potential max score)	
Scoring symbol		✓✓	✓	x	-	-	
Total score		843	13	0	-	- 878 Achieved score)	
Overall Compliance Rating Calculation (%)		$\{[(852+13+0)] / 878\} \times 100$					98%

20 RECOMMENDATIONS

Based on the noncompliance identified following is recommended:

- V-drains must be opened on the access roads to prevent water ponding.
- The access road must be regraded, and the gullies must be filled up.
- The contactor must ensure the service provider for disposing sewer is licenced to offer sewer disposal services.
- Toilets must be cleaned regularly
- All standing trucks must be equipped with drip trays and spoiled materials must be scooped and stored in plastic bags before being disposed at a registered landfill site.
- Waste separation must be done onsite.

21 CONCLUSION

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

In general, the EMPs are effective in their current format in terms of content and relevance and there are no major shortcomings. The 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, which appears to read 'Sakaunda'.

Sakaunda Jennipher

Environmental Control Officer

NCC Operations (Pty) Ltd

M · 069 510 7630

E · jenniphers@ncc-group.co.za

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

Date	Type	Impact	Description of Incident	Volume	Remedial Action	
	Chemical Spill/ Sewage/ Waste/ Fauna &Flora/ Fire/ Water/ Administrative/ Other	Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc.	What, Where, When, How, why did it happen?		Immediate Corrective Actions	Preventative measures
14/11/2024	Supply of inadequate toilets	The lack of toilets can potentially impact on the health and safety of the employees as well as air quality.	<p>On the 14th of November 2024 the contractor failed to provide sufficient sanitation for site activities.</p> <p>The TSF area had only one VIP toilet for 45 employees, this is against the (1-to 15) Male- (1-to 15) Female ratio as per EPC Procedures.</p> <p>POT testing Team was working in V3 without sanitation. On Several Occasions the toilets did not have water The toilets provided are insufficient for V1- V2 – V3 TSF activity.</p> <p>•The fencing team were working far from where the toilets were located.</p>	N/A	<ul style="list-style-type: none"> - Adequate toilets must always be provided ensuring that both man and women are supplied with separate toilets. - Additionally, the 1:15 ratio for the toilets must be met always. - Mobile toilets must be moved to the areas where work is being done. - Works should be stopped if there are inadequate toilets supplied. 	Proactive planning is required to ensure toilets are supplied to meet the demand on site.

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
			N/A			

ANNEXURE D – PHOTOGRAPHS



Figure 1: oil spillages



Figure 2: Waste must be stored properly



Figure 3: Bins onsite



Figure 4: Equipment with drip trays



Figure 4: Erosion on the access roads



Figure 5: Water ponding on the access roads



Figure 6: stockpiles should not exceed 2m in height



Figure 6: A buffer of 32m must be left between the graves and the stockpiles.

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DECEMBER 2024



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.

December 2024

PREPARED FOR:

Red Rocket South Africa (Pty) Ltd

URSA Energy (Pty) Ltd

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

DATED:

December 2024

PREPARED BY:

NCC Operations

T • 021 702 2884

E • info@ncc-group.co.za

DECLARATION OF INDEPENDENCE

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

Signed:

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

Jennipher Sakaunda

15 January 2025

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 and Associated Infrastructure
LOCATION	Free State Province
EA HOLDER	URSA Energy (Pty) Ltd
ECO	NCC Operations (Pty) Ltd
REVISION	00
DATE	15/01/2025

Revision	Date	Description
Rev 00	15/01/2025	First Draft - Internal
Rev 01	30/01/2025	Final - Authority submission

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Director of Compliance	DFFE	30/01/2025	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 Environmental Services
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
WEF	Wind Energy Facility

2 INTRODUCTION

2.1 Background

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

In addition, the ESCO will:

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

2.2 Audit Scope and Purpose.

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

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

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

2.3 Monitoring Frequency and Reporting.

The monitoring and reporting frequency by the ECO are monthly and this monitoring report, an audit site inspection was undertaken on the 13th of December 2024 after which this report was compiled which serves to document and record the audit proceedings and observations and provide recommendations and conclusions in relation to the audit. This report covers the monthly reporting for the month of December 2024.

3 AUDITOR BACKGROUND.

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

The auditor, Jennipher Sakaunda, is a senior environmental manager with more than 13 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
Tel	+27 21 702 2884
Mobile	+27 69 510 7630
Email	jenniphers@ncc-group.co.za
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.

4 GENERAL (NOTABLE EVENTS)

Construction work activities underway during the reporting period (December 2024) included the following:

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

4.1 General Outstanding matters

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

4.2 Audits (Internal and External)

Internal audits are undertaken monthly by the Red Rocket ESCO. This Audit was undertaken on the 13th of December 2024. Audit tables/checklists are available on request. The ECO undertakes external monthly audits.

5 WASTE MANAGEMENT

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

5.1 Domestic/ General Waste

Approximately 18 m³ of waste was generated on site in the month of December 2024. General waste bins are provided at the site camp. Approximately 100 kg of concrete waste was also removed from site. The service providers dispose the general waste at Matjhabeng Local Municipality waste disposal site-Licence number: B33/2/340/21/P8 16/2/7/C404/D2/Z1/P367. Proof of disposal is available on request.

5.2 Hazardous waste

No hazardous wastes have been reported as disposed during December 2024.

5.3 Wastewater

Approximately 64 000L of sewerage waste was generated on site in the month of December 2024. Chemical toilets are provided onsite. The Appointed Service Provider removes sewage and dispose of it at Matjhabeng Local Municipality wastewater treatment facility - Licence No: 10/D4/J/G/2082. Proof of disposal is available onsite. The contractor must ensure the appointed service provider is licenced to provide sewer removal services. Additionally, adequate ablution facilities must be always provided.

6 PROTECTIVE MEASURES

6.1 General

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

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

7 ENVIRONMENTAL CONSERVATION

7.1 Conservation of Flora and Fauna

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

7.2 Water Management

Approximately 21 000L of water was abstracted from a borehole located on a Portion of the farm Blomskraal 216 (Venterburg RD). The contractor must ensure water abstraction does not exceed the licenced volumes.

7.3 Soil Management

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

8 INFRASTRUCTURE MANAGEMENT

8.1 Access Roads

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

8.2 Fences, Gates, and Barricading

N/A.

8.3 Buildings and Structures

N/A.

9 SOCIAL RESPONSIBILITY

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

10 ENVIRONMENTAL AWARENESS AND TRAINING

The contractor has undertaken Toolbox talks for the month of **December 2024** covering the following topics:

- Storage & Segregation of Waste
- Topsoil management
- Concrete waste management
- Extreme heat
- Environmental and social management.
- Wildlife management

11 HERITAGE

The contractor has cleared vegetation encroaching into the 32m buffer between the graves. The contractor must rehabilitate the buffer area and demarcate the graves as a sensitive- and no-go area. The contractor's environmental officers must agree with the ESCOs on the activities that can be undertaken before commencing with the activities.

12 WARNING & NCRS

Three non-conformance reports ("**NCRs**") was issued by the ESCO during the month of December 2024. On the 27th of November 2024 some drivers drove through the No-Go areas. Based on the ESCO's report on the 27th of November 2024, the assistant construction manager for the EPC gave instructions to the driver of a premix truck to drive through the No-Go area between the Access Road and Virginia 2 after being prohibited from doing so by the ESCOs.

On the 12/12/2024 the contractor cleared vegetation encroaching into the 32m buffer for the burial site. According to the ESCO's report on the 12/12/2024 the EO for the contractor requested permission to grade an area to stockpile G5 material near the access gate. Permission to clear the area was denied by the ESCOs because the area is already disturbed, and stockpiling can proceed without unnecessary clearing to avoid dust generation. However, on the 13/12/2024 the subcontractor was observed clearing the area despite being advised against it. The clearing activities encroached with the 32m buffer of a burial site.

On the same day (12/12/2024), the contractor supervisor and the EO requested that the ESCOs provide advice on the possibility of levelling the stockpile heaps. The ESCO's, expressed that such actions might contravene the EMPR, which states that topsoil cannot be compacted in any way and should only be handled twice. However, the activity was undertaken confirmation with the ESCOs and the ECO.

13 REHABILITATION

No rehabilitation works have commenced during this period, further rehabilitation is expected to occur on the project as other works have been completed. The area that was cleared that falls within the 32m buffer of the graves must be rehabilitated accordingly.

14 INCIDENTS AND ACCIDENTS

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

15 MEETINGS AND OTHER CORRESPONDANCE

The ECO conducted the monthly site visit on the 13th of December 2024 with observations documented in this report. Monthly ECO compliance reports are submitted to the Department (DFFE) by the ECO.

16 AUDIT METHODOLOGY

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

16.1 Audit Process

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

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

16.2 Observation and Recommendation Determination

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

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

16.3 Findings

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

16.4 Audit Tables and Compliance Ratings

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

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

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

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

17 ASSUMPTIONS AND LIMITATIONS

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

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

18 CONSULTATION PROCESS

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

19 FINDINGS

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

- Dust
- Erosion on the access road.
- Water ponding on the access roads.
- Water leakage from the pipes at the water tank
- Double handing of topsoil
- Activities being undertaken in the no-go areas.

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.*

19.1 Minor improvements required.

- Fixing the leaking water pipe.

19.2 Major improvements required.

- Rehabilitation of the no-go areas near the burial site.
- Limiting the clearance of vegetation to areas that will be developed in two months and phasing the clearance of vegetation.
- Communication between the ESCOs and the Contractors EO must be improved.

20 AUDIT SUMMARY

In terms of the findings and results of the **December 2024** ECO audit, the project achieved an overall **98%** compliance rating with the conditions of the EAs and EMPs.

Table 4: Compliance Scoring

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

Total score	843	13	0	-	-	878 Achieved score)
	Overall Compliance Rating Calculation (%) $\{[(852+13+0)] / 878\} \times 100$					98%

21 RECOMMENDATIONS

Based on the noncompliance identified following is recommended:

- Clearance of vegetation must be phased to reduce the quantity of excessive dust generated.
- Stockpiles must be protected from erosion.
- Activities must be approved by the **ESCOs** before they are undertaken.
- The access road must be regraded, and the gullies must be filled up.
- All the hazardous waste kept onsite must be deposited at a registered hazardous landfill site. Proof of disposal must be submitted.
- The contractor must ensure the service provider for disposing sewer is licenced to offer sewer disposal services.
- All standing trucks must be equipped with drip trays and spoiled materials must be scooped and stored in plastic bags before being disposed at a registered landfill site.

22 CONCLUSION

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

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

PREPARED BY:

A handwritten signature in black ink, appearing to read 'Sakaunda', is centered below the 'PREPARED BY:' heading.

Sakaunda Jennipher

Environmental Control Officer

NCC Operations (Pty) Ltd

M ·069 510 7630

E · jenniphers@ncc-group.co.za

REVIEWED BY:

A handwritten signature in black ink, appearing to read 'Trevor O'Donoghue', is enclosed in a light grey rectangular box with a dashed border.

Trevor O'Donoghue

Senior Environmental Consultant

NCC Operations (Pty) Ltd

M ·084 465 4058

E ·trevorod@ncc-group.co.za

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

Date	Type	Impact	Description of Incident	Volume	Remedial Action	
	Chemical Spill/ Sewage/ Waste/ Fauna &Flora/ Fire/ Water/ Administrative/ Other	Water pollution/ Soil pollution/ Air pollution/ Erosion/ Biodiversity etc.	What, Where, When, How, why did it happen?		Immediate Corrective Actions	Preventative measures
12/12/2025	Encroaching beyond the allocated buffer for burial site	Loss of heritage significant resources.	On the 12/12/2024 the EO for the contractor requested permission to grade an area to stockpile G5 material near the access gate. Permission to clear the area was denied by the ESCOs because the area is already disturbed, and stockpiling can proceed without unnecessary clearing to avoid dust generation. However, on 13/12/2024 the subcontractor was observed clearing the area despite being advised against it. The clearing activities have encroached with the 32m buffer of a burial site.	N/A	- The affected areas must be rehabilitated.	Consultation and agreements must be done between EO and the ESCO before activities can be undertaken
12/12/2024	Double handling and compaction of topsoil	Loss of topsoil	On the same day (12/12/2024), the contractor supervisor and the EO requested that the ESCOs provide advice on the possibility of levelling the stockpile heaps. The ESCO's, expressed that such actions might contravene the EMPr, which states that topsoil cannot be compacted in any way and should only be handled twice. However, on 13/12/2024 it was discovered that the proposed stockpiling methodology had already been implemented without prior agreement	N/A	-	Consultation and agreements must be done between EO and the ESCO before activities can be undertaken

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
			with the ESCOs and the ECO.			
27/11/2024	Activities being undertaken in the no-go areas.	Loss of ecologically significant ecosystems	On the 27th of November 2024, the assistant construction manager for the EPC gave instructions to the driver of a premix truck to drive through the No-Go area between the Access Road and Virginia 2 after being prohibited from doing so by the ESCOs	N/A	<ul style="list-style-type: none"> - No go areas must be fenced off. - Refresher training courses must be done. 	The EMPr must be consulted before activities are undertaken.

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
			N/A			

ANNEXURE D – PHOTOGRAPHS



Figure 1: Excessive dust being generated.



Figure 2: Extensive area that has been cleared.



Figure 3: Waste must be disposed properly



Figure 4: Bins onsite



Figure 5: Bunded equipment

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