Naos Solar PV One OHL and Access Road

EA Reference: 14/12/16/3/3/1/3135

Environmental Audit Report



Access road leading to site.

Prepared by: Chandré de Waard

October 2026

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OHL and Access Road Environmental Audit Report – October 2026

1 Introduction

Amathemba Environmental Management Consulting CC has been appointed by Naos Solar PV Project One (Pty) Ltd to be the independent Environmental Control Officer for the Naos Solar Energy Facility construction phase. The site inspection was conducted on the 6th of October 2026. The following items should be noted:

1.1 Scope, purposes and objectives of the audit

The main objective of the compliance audit was to respond to the need for external compliance auditing as required in terms of condition 25 of the Environmental Authorisation (EA). The proposed development must comply with the following approved authorisations and Environmental Management Programme (EMPr):

Document Title	Document Reference Number	Date of Issue
Application For Environmental Authorisation in Terms of the National Environmental Management Act, Act No. 107 Of 1998, as Amended: Proposed Development of the Naos Access Road and the Up To 132 kV Overhead Powerline Corridor Infrastructure Project, Near Viljoenskroon in the Moqhaka Local Municipality, Fezile Dabi Distrct Municipality, Free State Province.	14/12/16/3/3/1/3135	16 July 2025
Naos Access Road and an up to 132 kV Overhead Powerline Infrastructure Project located near Viljoenskroon in the Moqhaka Local Municipality, Fezile Dabi District Municipality, Free State Province. Environmental Management Programme (EMPr)	14/12/16/3/3/1/3135	4 June 2025

1.2 Audit Methodology

The following methodology was employed for this external compliance audit:

1.2.1 Pre-audit tasks

Review of the various approvals / documents relevant to the development, namely:

- Environmental Authorisation issued by the Department of Forestry, Fisheries and Environment (DFFE).
- Approved EMPr.
- Spatial data where required.

1.2.2 Reporting

Compilation of the audit report is based on the information obtained during the audit inspection and subsequent follow-up liaison with the representative of the holder of the EAs. An electronic copy of this report is issued to the Holder of the EA and owing to the requirements in the EA under condition 24, to be submitted to the DFFE Compliance Department by the holder.

1.3 Assumptions, limitations, and gaps in knowledge

- The assumption is made that all information received on which this audit report is based, is accurate and correct. Parties that contributed information to inform this audit were the Holder of the EA and Contractors as representatives of the Holder of the EA.
- No public consultation was undertaken as part of this audit.
- The auditor had access to all the information necessary to compile this audit report. There are no gaps in knowledge that would suggest any level of uncertainty in the findings of the auditor.

2 Details of the EA Holder

The details of the EA holder are summarised below.

Company name	Naos Solar PV Project One (RF) (Pty) Ltd
Responsible person	Simon Haw
Postal address	2D Nautica The Water Club Beach Road Granger Bay 8005
Head office contact person	Simon Haw (021) 421 9764 naos@solagroup.co.za
Construction contact person	Leon Flaum leon@solagroup.co.za

3 Expertise of auditor

3.1 Chandré de Waard (Auditor and Author of Audit Report)

Chandré completed an Honours Degree (B.Sc. Hons.) in Environmental Management, and a B.Sc. Degree in Geology and Geography at the North-West University of Potchefstroom. Chandré is a member of the International Association of Impact Assessors of South Africa as well as the Environmental Law Association. Chandré has over nine (9) years of extensive experience in implementation and auditing of Environmental Authorisations (EAs) and Environmental Management Programmes (EMPrs) in the renewable energy, mining and oil and gas industries.

3.2 Barry Wiesner (Reviewer of Audit Report)

Barry completed a Master's in Philosophy (MPHIL) in Environmental Management at the University of Cape Town. Barry also has a BA majoring in Archaeology and Environmental and Geographical Science and has a Higher Diploma in Education (HDE) from the University of Cape Town. He also has a Bachelor of Theology from the University of South Africa. Barry is a Green Star SA Accredited Professional and a member of the International Association of Impact Assessors. Barry has extensive site experience working as an Environmental Control Officer (ECO) at major construction sites and in conducting Environmental Audits, EIAs, BARs and the compilation of numerous Environmental Management Programs (EMPrs) over the last 23 years.

3.3 Statement of Independence

Amathemba Environmental Management Consulting CC was appointed to carry out the external compliance audit and compile this resultant Audit Report. Neither Barry Wiesner, nor Chandré de Waard in their private capacity, nor Amathemba Environmental Management Consulting CC have any material present or contingent interest in the outcome of this report, nor do they have any pecuniary or other interest that could be reasonably regarded as being capable of affecting their independence. Amathemba Environmental Management Consulting CC has no beneficial interest in the outcome of this compliance audit, other than reasonable remuneration for work performed in undertaking the audit inspection and compiling this report.

4 Brief Project Description

The OHL corridor and the access road that was authorised by DFFE (14/12/16/3/3/1/3022) in September 2024 is no longer feasible due to Eskom requirements and landowner preference. The following aspects have been assessed for this EA: An access road that will connect to previously authorised access roads to provide access to the Naos Solar PV Projects, and five up to 132 kV OHL corridors with only one OHL corridor requiring

EA. The OHL will evacuate electricity from the Naos Solar PV Project One to the existing Eskom Mercury Main Transmission Substation (MTS) with a 32 m servitude, up to 300 m cable span and associated service road. Infrastructure associated with the project include:

Component	Description and Dimensions
Access Road	Up to 4.5 km long and up to 12 m wide Total length - 19 km
Powerline length	Approximately 8.5 km
Export capacity	Up to 132 kV
Proposed technology	Steel monopole/lattice either single or double circuit
Number of towers	Up to 90
Tower spacing	Up to 150 m and 300 m
Conductor attachment height	Up to 9.5 m – 25.8 m

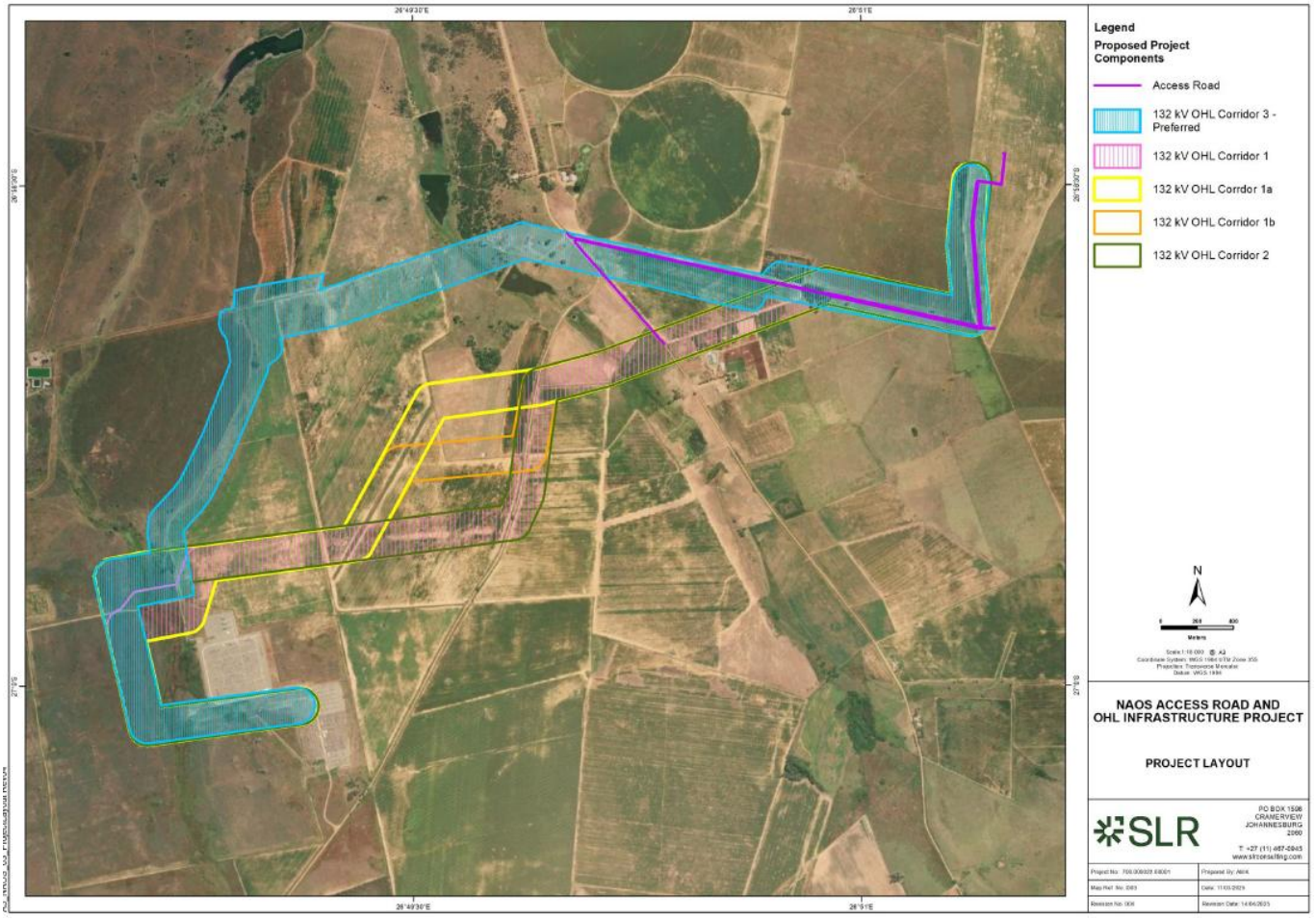


Figure 1: Project Layout Map for the Naos Access Road and the OHL Corridor Project

5 Pre-Construction Requirements

5.1 Environmental Authorisation

- Proof of notification as per conditions 9 & 10 sent to I&APs of the decision of EA and all amendments.
- Proof of any appeals and subsequent follow up if required.
- ECO appointment before commencement of authorised activities, and proof of appointment submission to Director: Compliance Monitoring – Notification submitted on 19 January 2026.

- Proof of commencement of construction notification submitted to the authorities 14 days prior to commencing with authorised activities, as per condition 30 – Notification submitted on 19 January 2026.
- Additional permits: Water Authorisation and Protected Plant Species Removal.
- Specific Conditions best addressed during the pre-construction phase:
    - Provide evidence that the final location of pylon positions has been checked and approved by an agricultural specialist during the design phase.
    - The farmstead must be retained, and a minimum buffer of 30 m must be established around the farmstead for the duration of the construction activities. Demarcation of this area prior to construction would be ideal.
    - Construction managers/foremen must be informed before construction starts about the possible types of heritage sites and cultural materials they may encounter, as well as the procedures to follow when they find such sites. This can be included in the site induction that is to be conducted prior to construction commencement.

5.2 Environmental Management Programme

- Method statements to be drafted in line with the Impact Management Actions in the EMPr:
    - Site Establishment.
    - Clear and Grub (Vegetation clearance and management).
    - Waste Management – All streams.
    - Stormwater Control and Water Management – Stormwater management, abstraction from water resources, logging of volumes, logging of levels, sampling (where applicable) in line with the WUL requirements.
    - Working in Sensitive Areas (Wetlands and water crossings).
    - Management of Fauna.
    - Hazardous Substances Management (include storage, handling, disposal).
    - Emergency Preparedness (inclusive of incidents such as accidents involving fauna inside open excavations; spillages; etc.).
    - Fire Management Plan.
    - Batching Plant.
    - Dust Emissions and Noise Management.
    - Soil and Stockpile Management.
    - Rehabilitation.
- No Threatened or Protected species (ToPs) and/or protected fauna as listed according NEMBA (Act No. 10 of 2004), and relevant provincial ordinances may be removed and/or relocated without appropriate authorisations/permits.
- Burial Site 03 (Farm: Kleinfontein 369. Coordinates: -26,97913; 26,83547) must be clearly demarcated with danger tape for the duration of the road being upgraded.
- Site 10.3.1 should be retained and a minimum buffer of 30 m must be established around the farmstead for the duration of the construction activities. If this is not feasible then the site should be recorded before destruction by archaeological/architectural techniques, i.e. map and photograph.
- Site 10.3.2 should be retained in situ and a buffer zone of at least 30 m should be created around it for the duration of the construction activities.
- Signage to be placed at the entrance of the project site to indicate that disturbance of the heritage sites and features is strictly prohibited.
- All necessary transportation permits will be applied for and obtained from the relevant authorities, including permits for abnormal loads.

- Search, rescue, and replanting of all protected and endangered species likely to be damaged during project development must be identified by the relevant specialist and completed prior to any development or clearing. The Aloe and Helichrysum species recorded, are of provincial concern only (listed under the Free State Nature Conservation Ordinance, 1969 (Ordinance No. 8 of 1969) (FSNCO)) and require permitting before are removed.
- Search and rescue for reptiles and other vulnerable species before areas of intact vegetation are cleared. Such search and rescue must be conducted by relevant experts with experience in search and rescue of the faunal groups concerned.
- Topsoil stripping to be conducted for areas to be temporarily and permanently transformed, and topsoil to be stockpiled at an agreed upon location within the development footprint.
- Construction area to be fenced off.
- Demarcate sensitive areas within or near the development as no-go areas.
- Fire breaks around the site must be constructed and cleared.
- The local Fire Protection Agency (FPA) must be informed of construction activities.
- Develop and implement communication strategies to facilitate public participation.
- Carry out monitoring of freshwater ecosystem ecological condition, including PES, EIS and Ecosystem Services. *This noted under the Construction Phase section of the EMPr – Ideal to have this specialist appointed prior to construction so that monitoring can commence with construction. Note that monitoring is required annually during the wet summer season, which is currently the case for this area.*
- Carry out monitoring of surface water quality in areas where surface water may be present (if practical as wetlands may not contain surface water in the dry winter season). Water must be tested at least once a month for a minimum of three months before construction commences. Water monitoring must be undertaken on a two-weekly basis during earthworks activities and once a month for three months after completion of construction. Monitoring must be carried out by a suitably qualified specialist. *This noted under the Construction Phase section of the EMPr – Ideal to have this specialist appointed prior to construction so that monitoring can commence with construction.*
- Carry out monitoring of growth and regrowth of AIPs during all phases. Focus must be placed on areas where vegetation is cleared, where earthworks activities are needed and in areas of increased anthropogenic activity (i.e. near laydown areas and temporary construction camps). Appointed floral ecologist to carry out monitoring. Preferably also a SACNASP registered practitioner. *This noted under the Construction Phase section of the EMPr – Ideal to have this specialist appointed prior to construction so that monitoring can commence with construction.*
- The ECO for this project must be informed that the Malmani Subgroup (Chuniespoort Group, Transvaal Supergroup) and Vryheid Formation (Ecca Group, Karoo Supergroup) have a Very High Palaeontological Sensitivity. Proof of signed letter of acknowledgement by the ECO. *Draft letter for signature by ECO.*
- Develop a Habitat Restoration Plan (HRP) and ensure that it is approved. Appointment of rehabilitation specialist to develop HRP.
- Should construction not take place within 6 months of receiving the EA then no objection confirmations form telecommunication companies Vodacom and Liquid Intelligent Technologies must be requested.
- Demarcate areas of existing Eskom infrastructure as no-go areas. The construction servitude and access routes must be clearly demarcated before construction activities. Refer to Section Impacts to Existing Eskom OHL in the Generic EMPr (2025-06-04 Naos 132 kV OHL Generic EMPr - V1) for details.

6 Requirements of Appendix 7 of EIA Regulations (2014, as amended)

This audit report has been compiled in accordance with the requirements of Appendix 7 of the 2014 EIA Regulations, as amended. These requirements are included herewith, which contains the minimum content requirements for compliance audit reports.

Regulatory Ref # of Appendix 7	Details of Requirement	Report Section Reference
1	The environmental audit report must provide for recommendations regarding the need to amend the EMPr, and where applicable, the closure plan.	N/A - No amendments required at this time.
2 (a) (i)	Report on level of compliance with the conditions of the environmental authorisation and the EMPr, and where applicable, the closure plan.	Section 8 and 9
2 (a) (ii)	Report on the extent to which the avoidance, management and mitigation measures provided for in the EMPr, and where applicable, the closure plan achieves the objectives and outcomes of the EMPr, and closure plan.	Section 8 and 9
2 (b)	Identify and assess any new impacts and risks as a result of undertaking the activity.	N/A - No new impacts identified additional to what has already been identified during the EIA.
2 (c)	Evaluate the effectiveness of the EMPr, and where applicable, the closure plan.	Section 8 and 9
2 (d)	Identify shortcomings in the EMPr, and where applicable, the closure plan.	Section 8 and 9
2 (e)	Identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr, and where applicable, the closure plan.	Section 8 and 9
3 (1) a	An environmental audit report prepared in terms of these Regulations must contain details of the— (i) independent person who prepared the environmental audit report; and (ii) expertise of the independent person that compiled the environmental audit report	Section 3.1
3 (1) b	a declaration that the independent auditor is independent in a form as may be specified by the competent authority;	Section 3.3
3 (1) c	an indication of the scope of, and the purpose for which, the environmental audit report was prepared;	Section 1.1
3 (1) d	a description of the methodology adopted in preparing the environmental audit report;	Section 1.2
3 (1) e	an indication of the ability of the EMPr, and where applicable, the closure plan to— (i) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an ongoing basis; (ii) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility; and (iii) ensure compliance with the provisions of environmental authorisation, EMPr, and where applicable, the closure plan;	Section 8 and 9
3 (1) f	a description of any assumptions made, and any uncertainties or gaps in knowledge;	Section 1.3
3 (1) g	a description of any public consultation process that was undertaken during the course of carrying out the environmental audit report;	Section 1.3
3 (1) h	a summary and copies of any comments that were received during any public consultation process; and	N/A
3 (1) i	any other information requested by the competent authority.	No additional requirements are known currently.

7 Compliance Monitoring

A site visit was undertaken on the 6th of October 2026 by Chandré de Waard and the auditor was accompanied by Tinyiko Ndlovu. The implementation of the EMPr will be monitored on a monthly basis, as well as progress of activities, especially as it relates to the relevant approvals and the various project phases. Relevant

photographs have been incorporated into Appendix D indicating the conditions on site at the time of the audit.

7.1 Documents Review

As part of the requirements in the EMPr the following documents need to be maintained:

Required Documents	✓/X/NA	Comments
Method Statements	✓	Method statements are in place.
Waste Manifests	✓	Most recent waste disposal manifests are available
Water Usage Tracking Register	**NA**	No water use from the registered boreholes has been tracked during this audit period.
Incidents Register	✓	Incidents Register is in place.
Weekly ESO Reports	✓	ESO compiles monthly reports.
Complaints Register	✓	Complaints register is in place.
Alien and Invasive Plants Management Plan	✓	Provide evidence of the A&IP's plan.

8 Results of Compliance Monitoring

8.1 Compliance Summary

8.1.1 EA Compliance

Of the total 55 conditions audited, 43 are applicable. Of the applicable conditions the resulting compliance scores are:

- Compliant – 100%
- Partially Compliant – 0%
- Non-Compliant – 0%

8.1.2 EMPr Compliance

Of the total 208 impact mitigation actions audited, 172 are applicable. Of the applicable actions the resulting compliance scores are:

- Compliant – 97%
- Partially Compliant – 3%
- Non-Compliant – 0%

8.2 Areas of Concern

Refer to Appendix A for open and overdue items as well as items that have been closed out. During this audit period the following concerns have been noted that requires urgent attention. Additional site photos have been included in Appendix D.

- During the previous audit period it was noted that red material is being imported to site from a nearby quarry that is outside of the development footprint. The borrow pit permit should be shared with the ECO as proof that material is being imported to site from a registered source as soon as the permit has been made available.
    - It has been reported that the process is underway. It is recommended that written agreement should be obtained before the sourcing of material can continue.

8.3 Non-Compliances

To date, no non-compliance has been issued to the project. Partial compliances are indicated in Appendix B and C, and areas of concern are highlighted in section 8.2 above.

8.4 Environmental Incidents

To date, no environmental incident has occurred.

8.5 Complaints

To date, no complaints have been lodged.

9 Adequacy of the EMPr

Based on the information review and areas inspected at the time of the audit, the EMPr is largely adequate and effective to manage the Naos Solar PV Overhead Powerline and Access Road project and associated infrastructure.

Auditor: Chandré de Waard

Signed: 

Date: 07 October 2026

APPENDIX A: PROJECT COMPLIANCE ACTION REGISTER

**Note that Open items that reflect for three consecutive months will result in the status to be indicated as Overdue. Open items that have been closed out will reflect one month after the close out to indicate the item to be Closed. A full action tracking register is available on request.*

Shading Key

Significance Rating	Description
Not Critical	Minimal impact observations with corrective actions to be implemented during the construction closure and rehabilitation phase.
Minor	Minimal impact observations with corrective actions to be implemented as soon as possible but no later than 30 days.
Major	Medium impact observations with corrective actions to be implemented with 7-14 days.
Critical	High impact observations with corrective actions to be implemented immediately or within 24-48 hours.

Date Issued	ECO Tracking #	EA/EMPr Condition #	Condition	Recommended Action	Significance Rating	Status
08-Apr-2026	#0595	EA Condition 39 & 40	Cleared alien vegetation must not be dumped on adjacent intact vegetation during clearing but must be temporarily stored in a demarcated area.	The alien vegetation noted during this audit period must be removed and disposed of as soon as possible.	Major	Closed
10-Jun-2026	#0612	EMPr 5.2.4 Fencing and Gate Installation	Existing and new gates to be recorded and documented.	Provide evidence of the gates along OHL that has been recorded.	Major	Open
10-Jun-2026	#0613	EMPr 5.2.5 Water Supply Management	For the utilisation of boreholes that may yield groundwater: ~ Utilise the boreholes as per the recommended sustainable yields and avoid over abstraction of any one borehole. ~ Address any water quality problems at the various boreholes. This may require treatment or appropriate mixing. ~ Where possible, rotate abstraction and distribute evenly between the boreholes to limit drawdown. ~ Monitor the borehole water levels and abstraction volumes. ~ The groundwater is of moderate quality and thus is not a source of potable as is (treatment to the SANS 241 standards would be required to render the water fit for human consumption, if used).	Provide evidence that water usage is monitored and that water levels are also being monitored. If borehole water will be consumed, quality tests in line with drinking water standards will have to be conducted regularly.	Major	Open
10-Jun-2026	#0614	EMPr 5.2.5 Water Supply Management	Reduce water demand by: ~ Dust suppression may employ chemical dust suppressants (i.e., Dustex® or similar) which are deployed on main haul roads in accordance with the supplier recommendations. This must be provisioned for in the Bill of Quantities and costed for by the Contractor. ~ Where possible, potable water must not be used for dust suppression.	Provide evidence that alternative dust suppression techniques have been considered as opposed to only using borehole water for dust suppression on access routes.	Major	Closed

Date Issued	ECO Tracking #	EA/EMPr Condition #	Condition	Recommended Action	Significance Rating	Status
			~ Water from evaporation / sediment ponds must be recycled for dust suppression (provided uncontaminated by deleterious materials).			
10-Jun-2026	#0616	EMPr 5.2.7 Solid and Hazardous Waste Management	A suitably positioned and clearly demarcated waste collection site must be identified and provided.	A designated waste collection area must be established in the laydown area. This area should be dedicated for the sorting and temporary storage of the recyclable, general and hazardous waste streams that are generated on site. - **A temporary waste management area is currently available. A permanent designated waste management area will be established as site establishment activities progress.**	Major	Open
10-Jun-2026	#0619	EMPr 5.2.7 Solid and Hazardous Waste Management	Certificates of safe disposal for general, hazardous and recycled waste must be maintained.	Provide evidence of most recent waste disposal records, inclusive of general, hazardous and sewage wastes.	Major	Open
10-Jun-2026	#0620	EMPr 5.2.9 Vegetation Clearing	Alien invasive vegetation must be removed according to a plan (in line with relevant municipal and provincial procedures, guidelines, and recommendations) and disposed of at a recognised waste disposal facility.	Provide evidence of the A&IP's plan.	Major	Closed
10-Jun-2026	#0623	EMPr 5.2.14 Prevention of Disease	Ensure that the workforce is sensitised to the effects of sexually transmitted diseases, especially HIV/ AIDS, COVID 19.	Provide evidence that appropriate awareness is raised on a regular basis for HIV/AIDS and COVID 19.	Major	Open
10-Jun-2026	#0625	EMPr 5.2.14 Prevention of Disease	Free condoms must be made available to all staff on site at central points.	Provide evidence that these have been made available on site.	Minor	Open
10-Jun-2026	#0627	EMPr 5.2.14 Prevention of Disease	Provide access to Voluntary HIV and COVID 19 Testing and Counselling Services.	Provide evidence that Voluntary HIV and COVID 19 Testing and Counselling Services are available to staff and personnel.	Minor	Open
10-Jun-2026	#0633	EMPr 5.2.17 Workshop, Equipment Maintenance and Storage	The workshop area must have a bunded concrete slab that is sloped to facilitate runoff into a collection sump or suitable oil / water separator where maintenance work on vehicles and equipment can be performed.	Ensure an appropriate workshop area is established for the servicing of plant on site where required.	Major	Closed
10-Jun-2026	#0635	EMPr 5.2.18 Batching Plants	Empty cement bags must be secured with adequate binding material if these will be temporarily stored on site.	Ensure a hazardous waste skip is available for the temporary on site storage of cement bags.	Minor	Closed
10-Jun-2026	#0673	EMPr 5.2.10 Protection of Fauna	No poaching must be tolerated under any circumstances. All animal dens near the works areas must be marked as Access restricted areas.	Provide evidence that animal dens have been identified by a specialist and clearly demarcated as per the specialist report.	Major	Open

APPENDIX B: ADDITIONAL SITE PHOTOGRAPHS

The images below reflect the conditions on site during the time of the audit, and the map illustrates areas visited during this audit period.

Site Photographs

Waste Management



Labelled waste bins at workshop area.



Waste bins in site camp area.



Waste skips in site camp area.

Ablution and Resting Facilities



Conservancy tank for site camp ablution facilities.



Mobile toilet near active works.



Mobile toilet near active works.



Mobile toilet in laydown area.

Access Control and Roads



Access control at main entrance point to entire site.



Access control at facility entrance point.



Access road leading to facility and substation.



Access road leading to facility and substation.



Access road leading to facility and substation.

Fauna and Flora



Burrowing noted along the Southern edge of development fenceline.



Relocated Bullfrog as per specialist recommendations.



Bush clearing underway in solar field.

Water Management



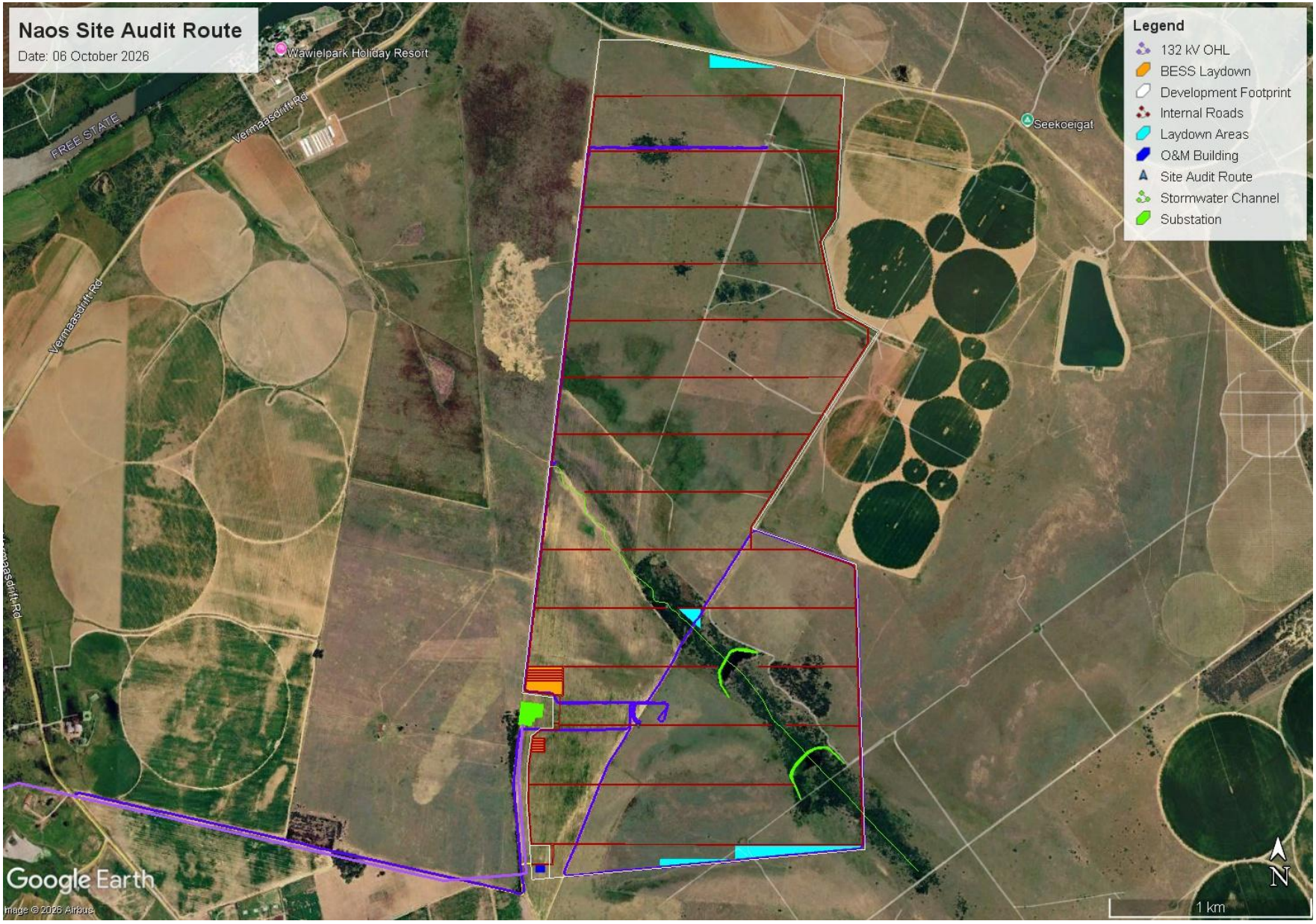
RO system installed on site with water tanks.

Substation



Substation platform footprint cleared and survey pegs posted.

Site Audit Map



APPENDIX C: CHECKLISTS

Shading Key

Compliance Result	Description	Symbol
Compliance	Fully compliant with EA conditions or EMPr impact management actions.	✓
Partial Compliance	When EA conditions are partially met, or EMPr actions on site are partially implemented, and where verification of site conditions or documentation may be required.	✓/X
Non-compliance	Fully non-compliant with EA conditions or EMPr impact management actions.	X
Not Applicable (N/A)	EA conditions or EMPr impact management actions are not applicable to the current phase of the project, or not applicable due to activities not being executed as part of the project scope.	NA

Environmental Authorisation - 14/12/16/3/3/1/3135

Condition	✓/X/NA	Comment
Scope of Authorisation		
1. The preferred access road alternative for the development of the Naos Access Road and the preferred OHL Corridor 3 for the development of the up to 132 KV Overhead Powerline, near Viljoenskroon within Ward 21 and 22 of the Moghaka Local Municipality, Fezile Dabi District Municipality, Free State Province. hereafter referred to as "the property" (coordinates as described under Annexure 2 below) is approved.	✓	This audit was undertaken at the approved location.
2. Authorisation of the activity is subject to the conditions contained in this Environmental Authorisation, which form part of the Environmental Authorisation and are binding on the holder of the authorisation.	✓	Construction is currently underway as per the conditions contained in this authorisation.
3. The holder of the authorisation is responsible for ensuring compliance with the conditions contained in this Environmental Authorisation. This includes any person acting on the holder's behalf, including but not limited to an agent, servant, contractor, sub-contractor, employee, consultant or person rendering a service to the holder of the authorisation.	✓	The conditions of the EA are being audited for compliance. Competent persons have been appointed to ensure compliance.
4. The activities authorised must only be conducted at the property as described above.	✓	Construction is currently underway as per the conditions contained in this authorisation.
5. Any changes to, or deviations from, the project description set out in this Environmental Authorisation must be approved, in writing, by the Department before such changes or deviations may be effected. In assessing whether to grant such approval or not, the Department may request such information as it deems necessary to evaluate the significance and impacts of such changes or deviations and it may be necessary for the holder of the authorisation to apply for further Environmental Authorisation in terms of the regulations.	✓	Required changes have been applied for and amendments approved.
6. The holder of an Environmental Authorisation must apply for an amendment of the Environmental Authorisation with the Competent Authority for any alienation, transfer or change of ownership rights in the property on which the activity is to take place.	✓	Required changes have been applied for and amendments approved.

Condition	✓/X/NA	Comment
Scope of Authorisation		
7. This activity must commence within a period of ten (10) years from the date of issue of this Environmental Authorisation. If commencement of the activity does not occur within that period, the authorisation lapses and a new application for Environmental Authorisation must be made in order for the activity to be undertaken.	✓	Construction is currently underway.
8. Construction must be completed within five (05) years of the commencement of the activity on site. The continuation of any such activities after the above-mentioned period may trigger one or more listed and/or specified activities, including activity 32 of LN1. Such continuation without the required environmental authorisation will constitute an offence or offences in terms of section 49A(1)(a) read with section 24F(1)(a) of NEMA.	✓	Construction is currently underway.
Notification of Authorisation and Right to Appeal		
9. The holder of the authorisation must notify every registered interested and affected party, in writing and within 14 (fourteen) calendar days of the date of this Environmental Authorisation, of the decision to authorise the activity.	✓	Required notification has been submitted to all I&APs on 21 July 2025, EA granted on 16 July 2025.
10. The notification referred to must — 10.1. specify the date on which the authorisation was issued; 10.2. inform the interested and affected party of the appeal procedure provided for in the National Appeal Regulations, 2014; 10.3. advise the interested and affected party that a copy of the authorisation will be furnished on request; and 10.4. give the reasons of the Competent Authority for the decision.	✓	Notification stipulates the date the EA was issued, informs of the Appeal Regulations, advises of a copy that is available and gives reasons of the CA's decision.
Commencement of Activity		
11. The authorised activity must not commence until the period for the submission of appeals has lapsed as per the National Appeal Regulations, 2014, and no appeal has been lodged against the decision. In terms of Section 43(7), an appeal under Section 43 of the National Environmental Management Act, Act No. 107 of 1998, as amended will suspend the Environmental Authorisation or any provision or condition attached thereto. In the instance where an appeal is lodged you may not commence with the activity until such time that the appeal has been finalised.	✓	No appeals have been lodged.
Management of the Activity		
12. The Layout Map titled "Layout and Sensitivity Map : Naos Access road and OHL infrastructure Project" dated 04 June 2025 appended in the folder marked as Appendix B-Maps of the BAR dated June 2025 is approved and must be implemented and adhered to.	✓	Noted. Project is being executed as per the approved EMPr.
13. The "Generic Environmental Management Programme (EMPR) for the development and expansion for overhead electricity transmission and distribution infrastructure" (Part C: Site specific Environmental Attributes) appended as appendix F of the BAR dated June 2025 is approved and must be implemented and adhered to.	✓	Noted. Project is being executed as per the approved EMPr.
14. The Naos Access Road Environmental Management Programme (EMPr) dated 04 June 2025 submitted as part appendix F of the BAR dated June 2025 is approved and must be implemented and adhered to.	✓	Noted. Project is being executed as per the approved EMPr.

Condition	✓/X/NA	Comment
Scope of Authorisation		
15. The EMPr must be implemented and strictly enforced during all phases of the project. It shall be seen as a dynamic document and shall be included in all contract documentation for all phases of the development when approved.	✓	EMPr is being implemented on site.
16. Changes to the approved EMPr must be submitted in accordance with the EIA Regulations applicable at the time.	✓	No changes to the EMPr required during this audit period.
17. The Department reserves the right to amend the approved EMPr should any impacts that were not anticipated or covered in the EIAR be discovered.	✓	Noted. No such amendment notifications have been received from the department.
Frequency and Process of Updating the EMPr		
18. The EMPr must be updated where the findings of the environmental audit reports, contemplated in Condition 25 below, indicate insufficient mitigation of environmental impacts associated with the undertaking of the activity, or insufficient levels of compliance with the environmental authorisation or EMPr,	**NA**	No update of the EMPr was required during this audit period.
19. The updated EMPr must contain recommendations to rectify the shortcomings identified in the environmental audit report.	**NA**	No update of the EMPr was required during this audit period.
20. The updated EMPr must be submitted to the Department for approval together with the environmental audit report, as per Regulation 34 of the EIA Regulations, 2014 as amended. The updated EMPr must have been subjected to a public participation process, which process has been agreed to by the Department, prior to submission of the updated EMPr to the Department for approval.	**NA**	No update of the EMPr was required during this audit period.
21. In assessing whether to grant approval of an EMPr which has been updated as a result of an audit, the Department will consider the processes prescribed in Regulation 35 of the EIA Regulations, 2014 as amended. Prior to approving an amended EMPr, the Department may request such amendments to the EMPr as it deems appropriate to ensure that the EMPr sufficiently provides for avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity.	**NA**	No update of the EMPr in line with Regulation 35 of the EIA Regulations was required during this audit period.
22. The holder of the authorisation must apply for an amendment of an EMP, if such amendment is required before an audit is required. The amendment process is prescribed in Regulation 37 of the EIA Regulations, 2014, as amended. The holder of the authorisation must request comments on the proposed amendments to the impact management outcomes of the EMPr or amendments to the closure objectives of the closure plan from potentially interested and affected parties, including the competent authority, by using any of the methods provided for in the Act for a period of at least 30 days.	**NA**	No update of the EMPr in line with Regulation 37 of the EIA Regulations was required during this audit period.
Monitoring		
23. The holder of the authorisation must appoint an experienced Environmental Control Officer (ECO) for the construction phase of the development that will have the responsibility to ensure that the mitigation/rehabilitation measures and recommendations referred to in this environmental authorisation are implemented and to ensure compliance with the provisions of the approved EMPr. 23.1. The ECO must be appointed before commencement of any authorised activities. 22.2. Once appointed, the name and contact details of the ECO must be submitted to the	✓	An ECO has been appointed to the project and conducted the pre-construction site audit in November 2025. Construction commenced on 16 February 2026.

Condition	✓/X/NA	Comment
Scope of Authorisation		
Director: Compliance Monitoring of the Department. 23.3. The ECO must keep record of all activities on site, problems identified, transgressions noted and a task schedule of tasks undertaken by the ECO. 23.4. The ECO must remain employed until all rehabilitation measures, as required for implementation due to construction damage, are completed and the site is ready for operation.		
Recording and Reporting to the Department		
24. All documentation e.g., audit/monitoring/compliance reports and notifications, required to be submitted to the Department in terms of this environmental authorisation, must be submitted to the Director: Compliance Monitoring of the Department.	✓	The required notifications and submissions in line with the EA has been submitted to the Department.
25. The holder of the environmental authorisation must, for the period during which the environmental authorisation and EMPr remain valid, ensure that project compliance with the conditions of the environmental authorisation and the EMPr are audited, and that the audit reports are submitted to the Director: Compliance Monitoring of the Department.	✓	An ECO has been appointed to the project and conducts compliance audits on a monthly basis.
26. The frequency of auditing and of submission of the environmental audit reports must be as per the frequency indicated in the EMP, considering the processes for such auditing as prescribed in Regulation 34 of the EIA Regulations, 2014 as amended.	✓	Monthly independent audits are undertaken by the ECO.
27. The holder of the authorisation must, in addition, submit environmental audit reports to the Department within 30 days of completion of the construction phase (i.e., within 30 days of site handover) and a final environmental audit report within 30 days of completion of rehabilitation activities.	**NA**	Not applicable to the current phase of the project.
28. The environmental audit reports must be compiled in accordance with Appendix 7 of the EIA Regulations, 2014 as amended and must indicate the date of the audit, the name of the auditor and the outcome of the audit in terms of compliance with the environmental authorisation conditions as well as the requirements of the approved EMPr.	**NA**	Not applicable to the current phase of the project.
29. Records relating to monitoring and auditing must be kept on site and made available for inspection to any relevant and competent authority in respect of this development.	✓	The required notifications and submissions in line with the EA has been submitted to the Department.
Notification to Authorities		
30. A written notification of commencement must be given to the Department no later than fourteen (14) days prior to the commencement of the activity. The notice must include a date on which it is anticipated that the activity will commence, as well as a reference number.	✓	Commencement notification was submitted on 19 January 2026 stating construction is expected to commence on 3 February 2026.
Operation of the Activity		
31. A written notification of operation must be given to the Department no later than fourteen (14) days prior to the commencement of the activity operational phase.	**NA**	Not applicable to the current phase of the project.
Site Closure and Decommissioning		
32. Should the activity ever cease or become redundant, the holder of the authorisation must undertake the required actions as prescribed by legislation at the time and comply with all relevant legal requirements administered by any relevant and Competent Authority at that time.	**NA**	Not applicable to the current phase of the project.
Specific Conditions		
33. No activities will be allowed to encroach into a water resource without a water use authorisation being in place from the Department of Water and Sanitation.	✓	The additional required permits are in place. - GA WU31381

Condition	✓/X/NA	Comment
Scope of Authorisation		
		- WUL 10/C24B/ACGI/16569 - DESTEA 202506000019975
34. The final location of pylon positions must be checked at a desktop level and be approved by an agricultural specialist at detailed design stage.	✓	An agricultural specialist has checked and confirmed location of pylon positions.
35. Anti-collision devices such as bird flappers must be installed where power lines cross avifaunal corridors (e.g., grasslands, rivers, wetlands, and dams).	**NA**	Anti-collision devices will be installed during later stages of the project.
36. All bird monitoring must be conducted in accordance with the latest BirdLife South Africa/Endangered Wildlife Trust; Best practice guidelines for avian monitoring and impact mitigation at proposed wind energy development sites in Southern Africa.	✓	No monitoring during construction is required.
37. Construction activities must be restricted to demarcated areas to restrict the impact on sensitive environmental features.	✓	Construction remains within the approved area.
38. No exotic plants must not be used for rehabilitation purposes; only indigenous plants of the area must be utilised.	✓	No exotic plants used for rehabilitation.
39. Cleared alien vegetation must not be dumped on adjacent intact vegetation during clearing, but must be temporarily stored in a demarcated area.	✓	The alien vegetation removed is not dumped onto adjacent vegetation.
40. Removal of alien invasive species or other vegetation and follow-up procedures must be in accordance with the Conservation of Agricultural Resources Act, 1983 (Act 43 of 1983).	✓	The alien vegetation noted during previous audit periods are being manually removed.
41. Contractors and construction workers must be clearly informed of the no-go areas.	✓	Induction is provided to all employees on site.
42. Disturbed areas must be rehabilitated as soon as possible after construction with locally indigenous plants to enhance the conservation of existing natural vegetation on site.	**NA**	No rehabilitation required at this phase of the project.
43. Wetlands, rivers, and river riparian areas must be treated as "no-go" areas and appropriately demarcated as such. No vehicles, machinery, personnel, construction material, fuel, oil, bitumen, or waste must be allowed into these areas without the express permission of and supervision by the ECO, except for rehabilitation work in these areas.	✓	It was verified that the no-go zones fall outside of the direct working areas.
44. Workers must be made aware of the importance of not destroying or damaging the vegetation along rivers and in wetland areas, and this awareness must be promoted throughout the construction phase.	✓	Toolbox talk covering topics on wetlands and heritage areas has been conducted.
45. Freshwater ecosystems located in close proximity to the construction areas must be inspected on a regular basis by the ECO for signs of disturbance from construction activities. If signs of disturbance are noted, immediate action must be taken to remedy the situation and, if necessary, a freshwater ecologist must be consulted for advice on the most suitable remediation measures.	✓	ECO is appointed and conducts monthly site verification audits. No concerns noted during this audit period.
46. No discharge of effluents or polluted water must be allowed into any rivers or wetland areas.	✓	No polluted water discharge was noted during this audit period.
47. If construction areas are to be pumped of water (e.g., after rains), this water must be pumped into an appropriate settlement area, and not allowed to flow into any rivers or wetland areas.	✓	No requirement for water to be pumped from construction areas.
48. Dust abatement techniques must be used before and during surface clearing, excavation, or blasting activities.	✓	Dust emissions are mitigated through compacted road layers and water suppression. No dust emissions noted during this audit period.

Condition	✓/X/NA	Comment
Scope of Authorisation		
49. Appropriate dust suppression techniques must be implemented on all exposed surfaces during periods of high wind. Such measures may include wet suppression, chemical stabilisation, the use of a wind fence, covering surfaces with straw chippings, and re-vegetation of open areas.	✓	Dust emissions are mitigated through compacted road layers and water suppression. No dust emissions noted during this audit period.
50. Should any archaeological sites, artefacts, paleontological fossils, or graves be exposed during construction work, work near the find must be stopped, SAHRA must be informed, and the services of an accredited heritage professional obtained for an assessment of the heritage resources to be made.	✓	No new features have been uncovered during this audit period.
51. The farmstead must be retained, and a minimum buffer of 30 m must be established around the farmstead for the duration of the construction activities.	✓	It was verified that the no-go zones fall outside of the direct working areas.
52. Construction managers/foremen must be informed before construction starts about the possible types of heritage sites and cultural materials they may encounter, as well as the procedures to follow when they find such sites.	✓	An initial kick off training conducted on 10 February 2026.
53. Should any human remains be uncovered during development, they must be immediately protected in situ and reported to the heritage authorities or to an archaeologist. The remains will need to be exhumed at the cost of the developer.	✓	No new features have been uncovered during this audit period.
General		
54. A copy of this Environmental Authorisation, the audit and compliance monitoring reports, and the approved EMPr, must be made available for inspection and copying - 54.1. at the site of the authorised activity; 54.2. to anyone on request; and 54.3. where the holder of the Environmental Authorisation has a website, on such publicly accessible website.	✓	Digital copies are available. Hardcopies to be filed once site offices have been established.
55. National government, provincial government, local authorities or committees appointed in terms of the conditions of this authorisation or any other public authority shalt not be held responsible for any damages or losses suffered by the holder of the authorisation or his/her successor in title in any instance where construction or operation subsequent to construction be temporarily or permanently stopped for reasons of non-compliance by the holder of the authorisation with the conditions of authorisation as set out in this document or any other subsequent document emanating from these conditions of authorisation.	**NA**	Noted.

Construction EMPR

Note that all **NA Impact Management Actions have been removed for the purposes of reporting on applicable actions, and compliant items have a combined Impact Management Objective line as per the EMPr for each of the EMPr conditions. Partial or non-compliant actions will be listed in this checklist. A full and detailed EMPr checklist is available on request.*

Impact Management Actions	**Compliance Results**	
	✓/X/NA	Comments/ Findings/ Recommendations
5.2.1 Environmental Awareness Training		
Impact management outcome: All onsite staff are aware and understand the individual responsibilities in terms of this EMPr.	✓	Training is provided to all staff and personnel prior to any works being conducted on site. Awareness of the EMPr is raised through toolbox talks.
5.2.2 Access Restricted Areas		
Impact management outcome: Access to restricted areas prevented.	✓	Access to site is controlled and managed. Only authorised personnel are permitted on site, and visitors are accompanied. Sensitive areas are demarcated appropriately.
5.2.3 Access Roads		
Impact management outcome: Minimise impact to the environment through the planned and restricted movement of vehicles on site.	✓	Movement of vehicles take place on existing roads and on roads as per the approved layout only.
5.2.4 Fencing and Gate Installation		
Impact management outcome: Minimise impact to the environment and ensure safe and controlled access to the site through the erection of fencing and gates where required.	✓	Existing access points are utilised to access the site. Fences and gates are maintained. Access is controlled to site.
Existing and new gates to be recorded and documented.	**✓/X**	Only one access point to site with one gate. Gates along OHL need to be recorded.
5.2.5 Water Supply Management		
Impact management outcome: Undertake responsible water usage.	✓	Water uses are registered and is being monitored. WU31381, WU42647 and WU31382.
For the utilisation of boreholes that may yield groundwater: ~ Utilise the boreholes as per the recommended sustainable yields and avoid over abstraction of any one borehole. ~ Address any water quality problems at the various boreholes. This may require treatment or appropriate mixing. ~ Where possible, rotate abstraction and distribute evenly between the boreholes to limit drawdown. ~ Monitor the borehole water levels and abstraction volumes. ~ The groundwater is of moderate quality and thus is not a source of potable as is (treatment to the SANS 241 standards would be required to render the water fit for human consumption, if used).	**✓/X**	Provide evidence that water usage is monitored and that water levels are also being monitored. If borehole water will be consumed, quality tests in line with drinking water standards will have to be conducted regularly.
5.2.6 Stormwater, Groundwater, and Wastewater Management		
Impact management outcome: Impacts to the environment caused by stormwater and wastewater discharges during construction are avoided.	✓	No spillages, minimal to no erosion and no stormwater accumulation requiring discharge noted during this audit period.
5.2.7 Solid and Hazardous Waste Management		
Impact management outcome: Waste is appropriately stored, handled and safely disposed of at a recognised waste facility.	✓	An integrated waste management approach is in place. Waste streams are being separated into general, hazardous and recyclables.
A suitably positioned and clearly demarcated waste collection site must be identified and provided.	**✓/X**	A designated waste collection area must be established in the laydown area. This area should be dedicated for the sorting and temporary storage of the recyclable, general and hazardous waste streams that are generated on site.

Impact Management Actions	Compliance Results	
	✓/X/NA	Comments/ Findings/ Recommendations
5.2.8 Protection of Watercourses		
Impact management outcome: Pollution and contamination of the watercourse environment are prevented.	✓	No impact to watercourses noted during this audit period. Works within wetlands authorised under WU31382.
5.2.9 Vegetation Clearing		
Impact management outcome: Vegetation clearing is restricted to the authorised development footprint of the proposed infrastructure.	✓	Vegetation clearance only takes place for permanent infrastructure in line with the authorised layout.
5.2.10 Protection of Fauna		
Impact management outcome: Minimise disturbance to fauna and avifauna.	✓	No poaching or other fauna related incidents reported during this audit period.
No poaching must be tolerated under any circumstances. All animal dens near the works areas must be marked as Access restricted areas.	✓/X	Provide evidence that animal dens have been identified by a specialist and clearly demarcated as per the specialist report.
5.2.11 Protection of Heritage Resources		
Impact management outcome: Minimise impact to heritage resources.	✓	No new features additional to what has been identified in the EIA phase have been uncovered during this audit period. Those noted in specialist reports fall outside the direct working areas.
5.2.12 Safety of the Public		
Impact management outcome: All precautions are taken to minimise the risk of injury, harm, or complaints.	✓	No complaints received during this audit period. A complaints register is in place.
5.2.13 Sanitation		
Impact management outcome: Clean and well-maintained toilet facilities are available to all staff in an effort to minimise the risk of disease and impact to the environment.	✓	Toilet and ablution facilities are available on site and are regularly serviced.
5.2.14 Prevention of Disease		
Impact management outcome: All necessary precautions linked to the spread of disease are taken.	✓/X	Appropriate awareness should be regularly raised on the spread and treatment of diseases.
Provide access to Voluntary HIV and COVID 19 Testing and Counselling Services.	✓/X	Provide evidence that Voluntary HIV and COVID 19 Testing and Counselling Services are available to staff and personnel.
5.2.15 Emergency Procedures		
Impact management outcome: Emergency procedures are in place to enable a rapid and effective response to all types of environmental emergencies.	✓	Emergency preparedness plans are in place.
5.2.16 Hazardous Substances		
Impact management outcome: Emergency procedures are in place to enable a rapid and effective response to all types of environmental emergencies.	✓	Emergency preparedness plans are in place.
5.2.17 Workshop, Equipment Maintenance and Storage		
Impact management outcome: Soil, surface water and groundwater contamination are minimised.	✓	No leaking equipment noted during this audit period.
5.2.18 Batching Plants		
Impact management outcome: Minimise spillages and contamination of soil, surface water and groundwater.	✓	Large scale concrete is batched off site and brought to site in ready mix trucks.
5.2.19 Dust Emissions		

Impact Management Actions	Compliance Results	
	✓/X/NA	Comments/ Findings/ Recommendations
Impact management outcome: Dust prevention measures are applied to minimise the generation of dust.	✓	No excessive dust emissions noted during this audit period. Dust suppression techniques are executed.
5.2.20 Noise		
Impact management outcome: Unnecessary noise is prevented by ensuring that noise from construction activities is mitigated.	✓	A complaints register is in place and being maintained and no noise complaint have been raised during this audit period.
5.2.21 Fire Prevention		
Impact management outcome: Prevention of uncontrollable fires.	✓	Fire-fighting equipment is available on site.
5.2.22 Stockpiling and Stockpile Areas		
Impact management outcome: Erosion and sedimentation as a result of stockpiling are reduced.	✓	Topsoil is being cleared in temporary areas.
5.2.23 Excavation and Installation of Foundations		
Impact management outcome: No environmental degradation occurs as a result of excavation or installation of foundations.	✓	Spoil is currently being utilised on site as far as possible.
5.2.24 Visual		
Impact management outcome: Visual setting is enhanced.	✓	Laydown areas and site camps, as well as buildings and solar panels are installed as per the approved layout.
5.2.25 Socio-economic		
Impact management outcome: Socio-economic development is enhanced.	✓	A CLO is appointed to manage appointments and liaison with the community.
5.2.26 Temporary Closure of Site		
Impact management outcome: Minimise the risk of environmental impact during periods of site closure greater than five days.	**NA**	No temporary site closure required to date.