

COMPLIANCE REPORT 02 FOR THE RENEWAL OF ENVIRONMENTAL CLEARANCES FOR 10 MW Solar (PV) Power Plant at Ohorongo Cement



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14 March 2023

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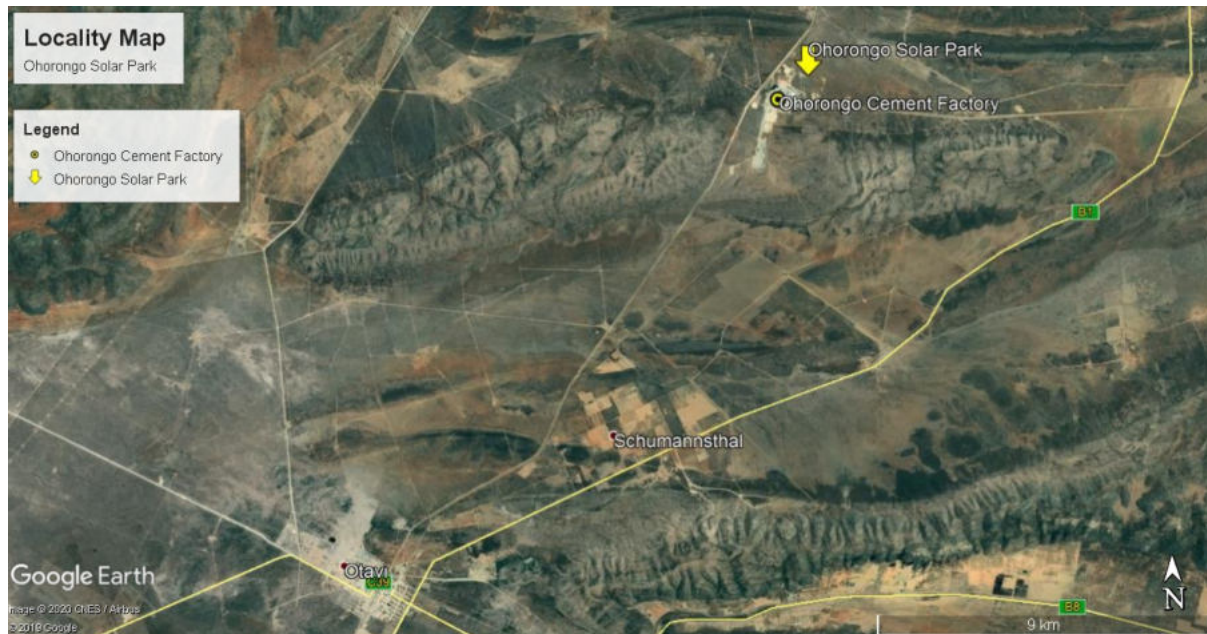


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Introduction and general comments

The Compliance Report relates to the renewal of the Environmental Clearance Certificate of SunEQ Four Investments (Namibia) (Pty) Ltd. owned solar PV power plant at the Ohorongo Cement site (see figure below).



The solar plant was subjected to the environmental impact assessment process and received Environmental Clearance (ECC) on 12 July 2017 (though the letter was dated 24 February 2017). An application for the ECC renewal was Lodged in February 2020 and the ECC renewal was received on 28 June 2020. The operational phase of the solar plant is therefore due for the second renewal of the Environmental Clearance (**Appendix 1**)

The Environmental Assessment Practitioner, Norman van Zyl, visited the solar park on 27 February 2023 to review the work done and operational activity.

The EAP was accompanied by operations representative of HopSol, Mr. Robert Vorster, during the site visit.

The visit achieved the following objectives:

- Evaluated the compliance of the construction process of the EMP requirements.
- Evaluated the compliance of the operational activities with the relevant EMP requirements.

The general remarks after the visit is:

- The compliance of the construction activities with the EMP requirements are satisfactory and deemed complete (see **Appendix 2**)
- The current operations comply with the revised Operations EMP requirements with minor procedural amendments to some activities required (see **Appendix 2**).

The following section will evaluate the outcomes of the compliance requirements in more detail.

Issues that were unforeseen and need modification.

The following issues has been observed on the terrain during the operational period by the operations manager of the site:

- The regrowing grass during the rainy season is significant. The EMP states that herbicide use is prohibited on vegetation growing on the site and the current management by means of small livestock grazing (40 units) is effective and can even be increased during the primary growth season (January to June).
- There are signs of increased invasive plant species. These and other intusive nonedibles can be remover mechanically once a year.
- Termite activity on site is significant and is mechanically managed under supervision. This must be monitored and the management thereof reviewed if operations are affected.



Photo set 1 Significant grass cover and example of inedible or invasive species growth

Issues that need minor improvement on site.

The following minor improvement measures is required on site (see **Appendix 2**, marked red):

- The solar collector/inverter boxes are accessible and not marked with danger signs. This can be improved with danger signs indicating electricity.
- Assure security lighting on the perimeter fence face down.
- Waste bins are absent and should be implemented, although the site is very clean.



Photo set 2 Warning signs on inverters, security lighting.

Issues that need procedural management.

Previously the EMP requirement tables consist of large amounts of information pertaining to construction activities that can be removed to streamline operations compliance monitoring. Modifications were explained and implemented during ECC Renewal Application 01.

The current Operations EMP reflect the adjusted tables (**Appendix 2**):

The Environmental Officer is the site Operations Manager at this stage.

The Operational EMP (**Appendix 2**) must be applied by the Operations Manager as a quarterly checklist during site visits. The Operations Manager should keep records for future reference.

The operations also require a formal Waste Management Plan/Checklist as well as a Emergency Response Plan/Checklist.

Conclusion and recommendation

The following conclusions can be deducted:

- The compliance of the construction activities with the EMP requirements are satisfactory and deemed complete.
- The current operations comply with the EMP requirements with minor procedural amendments to some activities required (see **Appendix 2**).

It is therefore recommended that:

- The Environmental Clearance Certificate is renewed.
- Grazing by an increased number of small stock be allowed.
- The minor improvements be implemented.
- Quarterly record keeping of the checklist be documented for future ECC renewals.
- The current Operational EMP tables be implemented.
- The recommended procedural adjustments be implemented.

APPENDIX 1

Current Environmental Clearance Certificate

APPENDIX 2

Revised EMP requirement list for the operational activities.

ACTIVITY	POTENTIAL IMPACT	MEASURE	OBSERVATION
BIODIVERSITY			
Materials delivery and laydown / storage	Potential impact on biodiversity	Prevent trapping and hunting.	Compliant
SURFACE WATER, GROUNDWATER AND SOIL RESOURCES			
Storage and handling of other hazardous substances (i.e. paint)	Contamination of surface water and groundwater resources and pollution of soil	Engineered containment of process areas, sewage facilities, wastewater, waste storage areas, vehicle maintenance areas, and hydrocarbon storage areas.	Compliant
Toilet facilities		Ensure good housekeeping and proper sanitation and treatment of wastewater during construction and operations.	Compliant
		Performing ablutions outside of established toilet facilities is strictly prohibited.	Compliant
Cleaning the solar panels – water supply	Reduction of water resource	Ensure that the current water abstraction permit for the Ohorongo Cement factory allows for the additional volume of water to be used for the cleaning of the panels. Use water sparingly and only use the allotted volumes of water.	Still need to implement water meter readings.
WASTE MANAGEMENT			
	Hydrocarbon pollution	All hydrocarbon (e.g. fuel, oils and contaminated soil / materials) and other hazardous waste (e.g. paints, bitumen, tar, etc.) resulting from spills, refueling and maintenance activities shall be disposed of in a licensed hazardous waste site or, where possible, sold to an approved used-oil recycling company.	Compliant

	Pollution	Contractor shall be responsible for the establishment of a solid waste control and removal system with temporary storage in a demarkated area.	Compliant
		Contractor shall provide bins (with lids) of sufficient number and capacity to store solid waste produced on a daily basis. The lids shall be kept firmly on the bins at all times.	Not compliant.
		Waste Management Plan in place.	Compliant
SOCIO-ECONOMIC			
General third party safety and security	General third party safety and security	Provide appropriate fencing, security access control and warning signs (in appropriate languages with danger pictures) at the PV power plant access point and around the entire PV power plant site, at appropriate intervals.	Partially compliant. See recommendations in report
		Develop and implement an emergency response plan for accidental injury to personnel, visitors, third parties or animals.	Compliant
Employment and contracting	Local content	Recruitment of nationals, in particular local people.	Compliant
		Promote small and medium enterprises (SME) development wherever possible.	Compliant
		Local (Tsumeb, Otavi) procurement whenever possible and encourage employees and the community to do the same.	
GENERAL			
Environmental Control		Presence of and Environmental Officer.	Compliant
		Emergency Response Plan in place	Compliant
		Environmental and Safety Induction to all new employees, contractors, and visitors.	Compliant