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JANUARY 2025 MONTHLY ECO AUDIT REPORT

IMPOFU CLUSTER WIND ENERGY FACILITY

DEA Reference Numbers:

Impofu North Wind Energy Facility: 14/12/16/3/3/2/1102
Impofu West Wind Energy Facility: 14/12/16/3/3/2/1103
Impofu East Wind Energy Facility: 14/12/16/3/3/2/1104
Buffer Yard: 14/12/16/3/3/1/2776



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List of Abbreviations

Abbreviation	Item
DEA	Department of Environmental Affairs
DFFE	Department of Forestry, Fisheries and the Environment
DWS	Department of Water and Sanitation
EA	Environmental Authorisation

Abbreviation	Item
ECO	Environmental Control Officer
EO	Environmental Officer
EGP	Enel Green Power
EIMS	Environnemental Impact Management Services (Pty) Ltd
EMPr	Environmental Management Programme
GA	General Authorisation
I&AP	Interested and Affected Party
NC	Non-Compliance
NCR	Non-Compliance Report
NMBMM	Nelson Mandela Bay Metropolitan Municipality
OHL	Overhead Line
MPRDA	Mineral and Petroleum Resources Development Act
WF	Wind Farm
WTG	Wind Turbine Generator
HCS	Hazardous Chemical Substance
DR	District Road
MSDS	Material Safety Data Sheet

Definitions

Term	Definition
Non-compliance (NC)	Instances where a provision of environmental legislation (national, provincial, or local) and/or condition of an environmental approval (for example, environmental authorisation, water use licence, waste licence, licence in terms of the National Forests Act) or any other legal document issued in terms of environmental legislation is contravened. For the purpose of the monthly ECO audits, it will include contraventions to the provisions of the EA and EMPr.
Incident	Any unplanned event that could, or does, result in harm, damage, and/or environmental pollution or degradation or gives rise to an accident or has the potential to lead to an accident.
Incident management	Incident management is an integral function of risk management and is aimed at reducing the impact of incidents, enabling corrective action to be taken and changed practice to be introduced. It also allows for learning from the

	incidents that have occurred to prevent similar incidents from happening or to mitigate their impact. This includes the effective communicating, reporting, measurement, recording and investigation of incidents.
NEMA section 30 incident	"Incident" means an unexpected, sudden and uncontrolled release of a hazardous substance, including from a major emission, fire or explosion, that causes, has caused or may cause significant harm to the environment, human life or property.

1 INTRODUCTION

Red Cap Impofu (Pty) Ltd was granted Environmental Authorisations (EAs) for construction of the three wind farms and associated infrastructure (i.e. Impofu North Wind Farm with DEA reference number: 14/12/16/3/3/2/1102; Impofu West Wind Farm with DEA reference number: 14/12/16/3/3/2/1103; Impofu East Wind Farms with DEA reference number: 14/12/16/3/3/2/1104) near Oyster Bay within Koukamma and Kouga Local Municipalities in the Eastern Cape. These Wind Farms (WF) are referred to as Impofu wind farms (Impofu Cluster).

The consolidated site of the Impofu Cluster is boarded by the operational Tsitsikamma Community Wind Farm to the west, the Gibson Bay Wind Farm to the south-west, the Oyster Bay Wind Farm and the Kouga Wind Farm to the south-east and extend over approximately 12 000 hectares (ha). More specifically, the Impofu East Wind Farm falls in the south-eastern extent of the site, with the Impofu West Wind Farm immediately west of it, with the Impofu North Wind Farm located to its north.

Ancillary infrastructure associated with the Impofu Cluster includes but is not limited to underground and above ground cabling between project components, with each Impofu WF having its own substation, foundations to support turbine towers, hardstands to support cranes at each turbine, permanent operations/maintenance buildings, temporary construction office and workshop areas. Service and access roads will be constructed in addition to upgrading existing roads, with the relevant stormwater infrastructure and gates constructed as required. Formal laydown areas for the construction period, containing temporary maintenance and storage buildings along with guard cabins will also be established. A buffer yard with turbine assembly will be established within the Impofu West boundary but will service the entire cluster. Concrete tower technology will be used for the wind turbines. Enel Green Power (Pty) Ltd (EGP) appointed Environmental Impact Management Services (Pty) Ltd (EIMS) to provide the services of the independent ECO.

This report provides details of the outcome of an environmental compliance audit for the month of January 2025 for the development of three (3) Wind Energy Facilities referred to as the Impofu Wind Cluster and associated infrastructure near Oyster Bay in the Eastern Cape.

1.1 DETAILS OF THE HOLDER

Details of the holder are summarised in Table 1 below.

Table 1: Details of the holder.

Company Name	Red Cap Impofu (Pty) Ltd.
Company Registration	Mr Lance Blaine
Head Office Physical Address	2017/118197/07
Head Office Telephone Number	Unit 2B, Mainstream Centre, Cape Town, 7806
Head Office Fax Number	(021) 790 1392
Head Office Contact Person	Mr Lance Blaine
Operations Physical Address	Impofu Wind Farm Cluster
Operations Telephone number	079 434 9559
Operations Contact Person	Mr Zishaan Khan

1.2 BRIEF PROJECT DESCRIPTION

The Impofu Cluster has a combined electrical generation capacity of approximately 333 MW. Each of these Wind Farms underwent separate environmental authorisation processes. Details of each wind farm comprising the cluster are noted below.

Impofu North

The Impofu North Wind Farm is located predominantly within the Kouga Local Municipality but also in the Koukamma Local Municipality (both within the Sarah Baartman District Municipality). The Impofu North site is centred on 34°2'54"S and 24°32'24.6"E and is approximately 16 kilometres (km) north-west of Oyster Bay as taken from the centre point. The Impofu North Wind Farm footprint straddles the N2 National Road and R102 Main Road. Initially the Wind Farm was authorised to construct Impofu North Wind Farm, a 182 MW Wind Farm comprised of up to 26 wind turbines. Following various assessments and new technologies becoming available, this was revised and is now 112.1 MW through 19 turbines.

Impofu East

The Impofu East Wind Farm is located entirely within the Kouga Local Municipality, within the Sarah Baartman District Municipality. The Impofu East site is centred on 34°7'37.9"S and 24°36'28.7"E. It is approximately 18 kilometres (km) south-west of Humansdorp, and approximately 6 km north-west of the town of Oyster Bay from the centre point of the site (700 m away at its closest point). The Impofu East Wind Farm is situated to the south of the N2 National Road and R102 Main Road. Initially the Wind Farm was authorised to construct Impofu East Wind Farm, a 189 MW Wind Farm comprised of up to 27 wind turbines. As above, this was revised and is now 112.1 MW through 19 turbines.

Impofu West

The Impofu West Wind Farm is located entirely within the Kouga Local Municipality, within the Sarah Baartman District Municipality. The Impofu West site is centred on 34°5'28" South latitude and 24°32'53" East longitude and is approximately 14 kilometres (km) north-west of Oyster Bay as taken from the centre point. Initially the Wind Farm was authorised to construct Impofu West Wind Farm, a 168 MW Wind Farm comprised of up to 24 wind turbines. As above, this was revised and is now 112.1MW through 19 turbines. (Refer to Figure 1 for the Impofu Cluster boundaries).

Authorisations, Permit and or Management Plans

The "Impofu Cluster" wind farms are located near Humansdorp of the Eastern Cape province and are split into three distinct areas known as Impofu North, West and East.

The below authorisations were obtained for the aforementioned:

- Impofu Wind Farm Cluster:
    - NEMA
        - Impofu East EA – 14/12/16/3/3/2/1103 (with amendments);
        - Impofu North EA – 14/12/16/3/3/2/1102 (with amendments);
        - Impofu West EA – 14/12/16/3/3/2/1104 (with amendments);
        - Impofu Cluster – Buffer yard (14/12/16/3/3/1/2776) (situated at West).
    - NWA
        - Impofu East GA Section 21(a), (c) and (i);
        - Impofu North GA Section 21(a), (c) and (i); and
        - Impofu West GA Section 21(a), (c) and (i).

Additional to the above authorisations, EMPr's have been approved for each of the authorisations.

Other permits (such as biodiversity) may also apply. Refer to section 4.1 for additional permits.

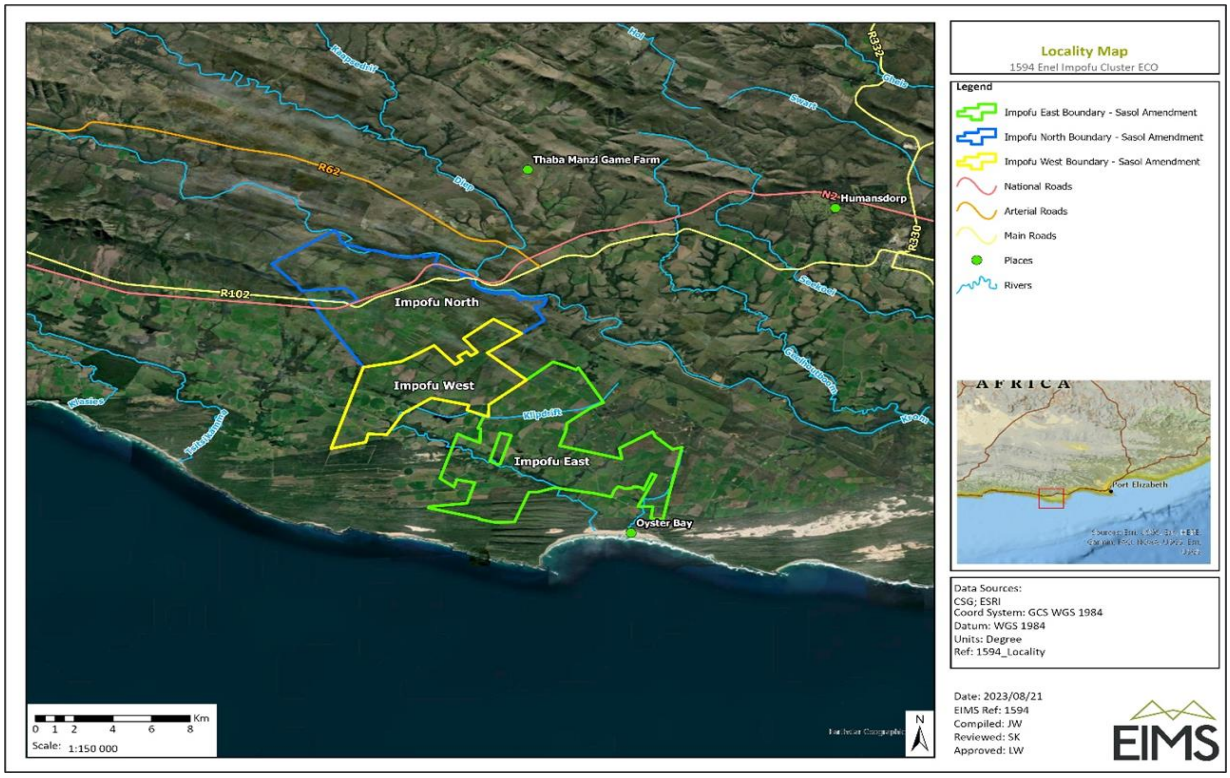


Figure 1: Impofu Cluster boundaries

The112.1MW Impofu North Wind Farm will comprise of the following infrastructure:

- Turbines: Up to 19 turbines with a hub height of 120m, and rotor diameter of 163m, the minimum tip height (ground clearance) will be at least 38.5m:
- Crane hard stands: One per turbine, with a permanent hardstand 40m x 50m which will remain for maintenance purposes;
- Access and internal roads: The internal gravel roads will be approximately 6m wide with potential side drains. Some sections of these roads would need to the temporary widened up to 12m during construction;
- On-site substation: Each substation is approximately 150 x 75m (11 250m^2) which will occupy the area for operation and maintenance;
- Cables: Each turbine will be connected to the substation via medium voltage cables (~33kV lines). Where feasible the cables will be laid underground in trenches, generally running alongside existing or proposed new internal roads. Where burying of cables is not possible due to technical, geological, environmental or topographical constraints, then burying of cables is not possible due to technical, geological, environmental or topographical constraints, then overhead power lines will be erected;
- Permanent Operational & Maintenance (O&M) buildings: The substation area would house buildings or areas for control, operation, workshop and storage: and,
- Laydown area and site camp: The temporary laydown areas will be approximately 161 200m^2 and the permanent area 52 000m^2 and the temporary site camp of approximately 15,000m^2. An additional 1,000m^2 will be temporarily required for concrete batching.

The 112.1MW Impofu West Wind Farm will comprise of the following infrastructure:

- Turbines: Up to 19 turbines with a hub height of 120m, and rotor diameter of 163m, the minimum tip height (ground clearance) will be at least 38.5m:
- Crane hard stands: One per turbine, with a permanent hardstand 50m x 40m which will remain for maintenance purposes;
- Access and internal roads: The internal gravel roads will be approximately 6m wide with potential side drains. Some sections of these roads would need to the temporary widened up to 12m during construction;

- On-site substation: Each substation is approximately 150 x 75m (11 250m^2) which will occupy the area for operation and maintenance;
- Cables: Each turbine will be connected to the substation via medium voltage cables (~33kV lines). Where feasible the cables will be laid underground in trenches, generally running alongside existing or proposed new internal roads. Where burying of cables is not possible due to technical, geological, environmental or topographical constraints, then burying of cables is not possible due to technical, geological, environmental or topographical constraints, then overhead power lines will be erected;
- Permanent Operational & Maintenance (O&M) buildings: The substation area would house buildings or areas for control, operation, workshop and storage: and,
- Laydown area and site camp: The temporary laydown areas will be approximately 148 800m^2 and the permanent area 48 000m^2 and the temporary site camp of approximately 15,000m^2. An additional 1,000m^2 will be temporarily required for concrete batching.

The 112.1MW Impofu East Wind Farm will comprise of the following infrastructure:

- Turbines: Up to 19 turbines with a hub height of 120m, and rotor diameter of 163m, the minimum tip height (ground clearance) will be at least 38.5m:
- Crane hard stands: One per turbine, with a permanent hardstand 40m x 50m which will remain for maintenance purposes;
- Access and internal roads: The internal gravel roads will be approximately 6m wide with potential side drains. Some sections of these roads would need to the temporary widened up to 12m during construction;
- On-site substation: Each substation is approximately 150 x 75m (11 250m^2) which will occupy the area for operation and maintenance;
- Cables: Each turbine will be connected to the substation via medium voltage cables (~33kV lines). Where feasible the cables will be laid underground in trenches, generally running alongside existing or proposed new internal roads. Where burying of cables is not possible due to technical, geological, environmental or topographical constraints, then burying of cables is not possible due to technical, geological, environmental or topographical constraints, then overhead power lines will be erected;
- Permanent Operational & Maintenance (O&M) buildings: The substation area would house buildings or areas for control, operation, workshop and storage: and,
- Laydown area and site camp: The temporary laydown areas will be approximately 167 400m^2 and the permanent area 54 000m^2 and the temporary site camp of approximately 15,000m^2. An additional 1,000m^2 will be temporarily required for concrete batching.

1.3 PROJECT PROGRESS

The project currently has three (3) contractors, Power Construction (appointed for civil works), Brand Besamandla (appointed for electrical works) and Nordex Energy SA (Pty) Ltd (appointed for Turbine Supply and Assembly). Power construction has appointed subcontractors to undertake some works, i.e. Kouga Fencing and Tsitsikamma Works Projects to do fencing, Summertree Civils for stormwater installation, Wake Field for steel fixing, Dakar Concrete for concrete pouring, Bay Projects for upgrading and bush clearing on road reserves, Abnormal Solution for upgrading N2 roads, PNP Trading for installing cattle grids, Martinash Trading for cleaning turbine bases and Lucon Civils for trenching. Scribante appointed to supply concrete. Brand Besamandla has appointed Power Buildings for construction of the Operational and Maintenance (O&M) facilities, Independent Power Producer (IPP) control building as well as Eskom Building, and M&T Solutions for Met Mast installation. Nordex has appointed Johnson Crane Hire to provide with cranes for tower installation and assembling, Eazi Access for Machine Hire, Tembo for transport and logistics, and Downings Marquees for Marquee Hire.. Construction progress meetings are held daily in the morning. During progress meetings, environmental issues are also discussed. HSE meetings are held once monthly. Works underway includes:

- WTG foundation
- Crane pads
- Access roads
- North substation

- East substation
- Powfontein substation
- West substation
- MV reticulation
- Met mast excavations and installation, and
- Preparations for delivery of turbine components at the buffer yard

2 DETAILS OF THE ECO

As per the issued EAs, an experienced independent Environmental Control Officer (ECO) with experience in the environmental management field was appointed for the construction phase of the development as required in terms of Condition 25 of the EAs. EGP appointed Environmental Impact Management Services (Pty) Ltd (EIMS) to provide the services of the independent ECO. The ECO audit was undertaken by Bulelwa Runeyi from EIMS.

2.1 EXPERTISE OF THE ECO

Bulelwa Runeyi has a National Diploma in Environmental Management with an excess of 10 years' experience in the Environmental Management field. She has completed a short course in Environmental Law with the University of Pretoria. She is a registered Environmental Assessment Practitioner (EAP) with the Environmental Assessment Practitioners Association of South Africa (EAPASA). After graduating, Bulelwa worked in a private company as an Environmental Officer where she gained experience in environmental education and conducting environmental awareness campaigns in schools and communities. She further acquired training in stakeholder engagements and peer coaching on environmental conservation. She also has experience in conducting Environmental Impact Assessments, Water Use License Applications, Public Participation Coordination, development of Environmental Management Programmes, and conducting independent environmental compliance audits.

2.2 DECLARATION OF INDEPENDENCE

*I, **Bulelwa Runeyi**, declare that –*

- *I act as the independent Environmental Control Officer;*
- *I will perform the work relating to the ECO audits in an objective manner, even if this results in views and findings that are not favourable to the Client;*
- *I declare that there are no circumstances that may compromise my objectivity in performing such work;*
- *I have expertise in conducting environmental audits, including knowledge of the environmental Acts, regulations and any guidelines that have relevance to the audited operations;*
- *I will comply with the relevant Acts, regulations and all other applicable legislation;*
- *I have no, and will not engage in, conflicting interests in the audit process; and*
- *I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the NEMA.*

I do not have and will not have any vested interest (either business, financial, personal or other) in the audit other than remuneration for work performed.

Signature: 

3 SCOPE, PURPOSE AND OBJECTIVE OF THE AUDIT

The scope of the audit is to assess compliance with the conditions of the Impofu Wind Farms (North, West and East) and their associated infrastructure EA/EMPr as well as related permits and licences near Oyster Bay in the Eastern Cape Province. The EMPr dated 17 May 2023 was approved was approved by DFFE on the 13th of June 2023 as part of the EA for Impofu Wind Farms. The purpose of the audit is to ensure compliance with the requirements of the EMPr which requires monthly compliance monitoring of the EMPr during the construction period. The objective of the audit is to determine and monitor the level of compliance of the License Holder with the provisions of the requisite EA and EMPr, related permits as well as licences. This report is prepared in accordance with Appendix 7 of the 2014 EIA Regulations (as amended). The objective of the environmental audit report is to:

- report on –
    - the level of compliance with the conditions of the EA and the EMPr, and where applicable, the closure plan; and
    - 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.
- identify and assess any new impacts and risks as a result of undertaking the activity.
- evaluate the effectiveness of the EMPr, and where applicable, the closure plan.
- identify shortcomings in the EMPr, and where applicable, the closure plan; and
- identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr, and where applicable, the closure plan.

4 AUDIT METHODOLOGY

4.1 PROCEDURE FOR THE AUDIT

Regular audits are conducted in accordance with the principles and processes outlined in SANS 19011: 2012 Edition 2: Guidelines for Auditing Management Systems. The audit focused on the following elements of the project with respect to the EA (DEA Ref: 14/12/16/3/3/2/1102, 14/12/16/3/3/2/1103 and 14/12/16/3/3/2/1104) as well as the updated and approved EMPr for the Impofu Wind Farms and associated infrastructure dated 17 May 2023; relevant environmental legislations, as well as environmental method statements. Audit was also conducted for the Water Use Authorisation (Ref Nos.: WU9784, WU20735, WU14968, WU20748, WU15014, WU20736, and WU15001) in terms of the National Water Act 36 of 1998 section 22 (1) (a) (iii).

During the audit, the ECO requested the following information:

- EA, EMPr, permits, licences, all other relevant authorisations and approvals.
- Environmental management monitoring such as water use registers, test analysis, noise and dust monitoring (if any).
- Pre-Construction requirements such as site establishment requirements/method statements and layout plan.
- Training requirements such as inductions, and awareness training registers.
- Incident reports and incident registers.
- Compliant registers.
- Waste management manifests, and
- Contractor's EO weekly/ weekly site inspection reports.

4.2 EVALUATION CRITERIA USED DURING THE AUDIT

The evaluation criteria for compliance scoring was based on a pre-determined scoring system. Each condition of the EA and EMPr was weighted equally in order to determine a compliance score. The scoring criteria used during the audit are as follows:

- Full-Compliance: Indicating that the condition was fully complied with and provided with a compliance score of 4.
- Partial-Compliance: Indicating that the condition has not been fully complied with and that additional measures are required to obtain full compliance. Partial compliances were provided with a compliance score of 2.
- Non-Compliance: Indicting that the condition has not been complied with and provided with a compliance score of 0.
- Not Applicable (N/A): Indicating that the condition is not currently applicable. Not applicable conditions were removed from the total number of conditions from which the compliance score was calculated during this reporting period.

4.3 DOCUMENTATION REVIEW

Initial documentation was obtained and reviewed in preparation for the assessment monitoring. Checklists were prepared based on the requirements of the EAs, EMPrs and the GA. Most relevant legal documents were available upon request during the ECO environmental monthly audit from the client and the appointed contractors, including the following:

License/Permit Holder: Red Cap Impofu (Pty) Ltd.

- The 2nd amendment of the EA for the 182MW Impofu North Wind Energy Facility (reference Number: 14/12/16/3/3/2/1102/AM2) was approved by DFFE on the 6th of December 2022. This was read together with the EA dated 25 September 2019 and the 1st amendment dated 11 November 2020.
- The 2nd amendment of the EA for the 168MW Impofu West Wind Energy Facility (reference Number: 14/12/16/3/3/2/1103/AM2) was approved by DFFE on the 6th of December 2022. This was read together with the EA dated 23 September 2019 and the 1st amendment dated 16 November 2020.
- The 2nd amendment of the EA for the 189MW Impofu East Wind Energy Facility (reference Number: 14/12/16/3/3/2/1104/AM2) was approved by DFFE on the 6th of December 2022. This was read together with the EA dated 25 September 2019 and the 1st amendment dated 16 November 2020.
- Buffer yard and concrete batching plant for the Impofu Wind Cluster (reference Number: 14/12/16/3/3/1/2776) was approved on the 24th of October 2023.
- Environmental Management Programme (EMPr) revision five and the site layout map was approved by the DFFE on the 13th of June 2023.
- Water Use Authorisation (General Authorisation – GA) for abstraction (Section 21a) of water for industrial use of two boreholes was approved on the 29th of September 2021 for the Impofu North Wind Farm.
- Water Use Authorisation (GA) for Section 21 (c, i and g) was approved on the 21st of September 2021 for the Impofu North Wind Farm.
- Water Use Authorisation (GA) for abstraction (Section 21a) of water for industrial use of two boreholes was approved on the 29th of September 2021 for the Impofu West Wind Farm.
- Water Use Authorisation (GA) for Section 21 (c, i and g) was approved on the 06th of October 2021 for the Impofu West Wind Farm.
- Water Use Authorisation (GA) for abstraction (Section 21a) of water for industrial use of two boreholes was approved on the 29th of September 2021 for the Impofu East Wind Farm.
- Water Use Authorisation (GA) for Section 21 (c, i and g) was approved on the 06th of October 2021 for the Impofu East Wind Farm.
- Water Use Authorisation (GA) for Section 22 (1) (a) (iii) was approved on the 1st of November 2019 for the abstraction of water from a registered dam for the wind farms.
- Mineral and Petroleum Resources Development Act 28 of 2002 (MPRDA) Section 53 Consent for the Impofu North Wind Farm was received on the 16th of September 2019 with no expiry date.
- Water Use Authorisation (GA) for Section 21 (a, c and i) was approved on the 26th of January 2024 for the Impofu West Wind Farm.

- Water Use Authorisation (GA) for Section 21 (a, c, and i) was approved on the 29th of July 2024 for the Impofu East Wind Farm.
- Exemption regarding pruning of Syderoxylon Inerme (White Milkwood) Tree (reference number: 20/8/5/1-RCIW) received from DFFE on the 18th of July 2024.
- Turbine blade painting approval on Impofu East and West Wind Farm from Civil Aviation Authority on the 06th of October 2024.

Monitoring documents and registers

The construction EMPr has been made part of the contract documentation with the Contractors appointed to construct the Impofu Wind Farms and associated infrastructure as required by condition 4.1.1.2 of the EMPr. Environmental training/induction is conducted by the EOs for site employees and management regarding the contents of the EA and the EMPr. Training registers are kept in the site file. Environmental Officer weekly monitoring reports are available and up to date.

Relevant environmental method statements were available and reviewed by the ECO as required by the EMPr section B section 3.1.2. Registers were available in the contractors site file such as the updated incident register; a complaint register; updated water register; an updated training register; as well as the updated waste register.

Waste Management

Domestic/General Waste

Waste separation is encouraged for recycling purposes where possible. Power Construction has appointed an independent service provider, Luvan Plant Hire (Pty) Ltd for collection and disposal of general waste at registered landfill site, Humansdorp Landfill site (permit number: 12/9/11/P53) in Kouga Local Municipality. A total of 12 m^3 of general waste was collected from site and disposed at the landfill site on the 14th and 17th of January 2025. Waste disposal certificates are kept in the environmental file for records. The ECO advised that the safe disposal certificates be filed for auditing and record retention purposes.

Nordex is in a process to appoint a service provider for collection and disposal of waste. Nordex has not produce waste that requires disposal.

Hazardous Waste

Power Construction has appointed independent service provider, Extreme Projects to collect, transport and dispose of hazardous waste at a registered hazardous landfill facility. Extreme Projects (registration number: 2011/05) transports hazardous waste to Aloes II Waste Treatment Facilities (Licence Number: 12/9/11/L624/1). During this reporting period, a total of 1,05 m^3 of hazardous waste was collected and disposed on the 09th of December 2024. The ECO advised that all hazardous waste safe disposal certificates and/or waste manifests must be acquired for hazardous waste removed from site and records must be kept for audit purposes.

Sewage Waste

Power Construction (Power) appointed a service provider for chemical toilets, Bidvest Toilet Hire (Bidvest). Bidvest service, collect and dispose effluent at a registered treatment plant (Fishwater Flats Wastewater Treatment Works- licence number: 12/9/11/L433/1) at Nelson Mandela Bay Municipality. Power appointed another service provider for mobile flushable ablution facilities (Portable toilets) at the site camp. The flushable toilets are serviced by Sewage Works (Pty) Ltd (SW). SW dispose their effluent at Jeffreys Bay Wastewater Treatment Works under Kouga Local Municipality (Licence number: 12/K90F/EF/4333). During this reporting period, Bidvest collected 17,5 m^3 of effluent for disposal from servicing toilets on the 11th, 13th, 14th, 15th, 17th, 18th, and 20th of January 2025. SW pumped and disposed a total of 30 m^3 of sewage from the conservancy tank on the 13th, 16th, and 21st of January 2025 (10 m^3 on each day). Chemical toiles on site are secured and anchored to the ground, to prevent them from being blown over. Waste disposal certificates are available in the contractor's environmental file.

At the substations (North, East, West, and Powfontein), Brand Besamandla also appointed a service provider, Bidvest to service, collect and dispose effluent at a registered treatment plant (Fishwater Flats Wastewater

Treatment Works with Licence number: 12/9/11/L433/1 and permit number: T2021/005) at Nelson Mandela Bay Municipality. The contractor makes use of chemical toilets that are supposed to be serviced twice a week. During this reporting period, Bidvest collected 1,4 m^3 of effluent for disposal from servicing toilets from the 04th to 10th of December 2024 and 14th to 21st January 2025.

Power Buildings has appointed a service provider, Bidvest to service, collect and dispose effluent at a registered treatment plant (Fishwater Flats Wastewater Treatment Works with Licence number: 12/9/11/L433/1 and permit number: T2021/005) at Nelson Mandela Bay Municipality. The contractor makes use of chemical toilets that are serviced once a week. The toilets were serviced on the 10th, 20th, and 21st of January 2024. A total of 0,32 m^3 of effluent was disposed at the wastewater treatment works.

Nordex has appointed a service provider, Sanitech to collect and dispose effluent at a registered treatment plant (Fishwater Flats Wastewater Treatment Works with Licence number: 12/9/11/L433/1 and permit number: T/2020/003). Sanitech serviced on the 10th, 20th, and 21st of January 2024. A total of 1000 0,32 m3 Litres of effluent was disposed at the wastewater treatment works.

Health Care Risk Waste

Ubabalo Ambulance who has been appointed by Power Construction for medical incidents on site has appointed a service provider for collection, transport and disposal of Health Care Risk Waste (HCRW), Compass Medical Waste Services Pty (Ltd) (Compass). Compass is registered as HCRW treatment Facility (DFFE licence number: 12/9/11/L221109112152/1/R) and registered as a transporter of medical waste with Buffalo City Metropolitan Municipality (Registration number: BCMM-13/hcrw/t/02). During this reporting period no HCRW was disposed.

Water Consumption

Power, Besamandla, and Nordex currently use water abstracted from Steynburg, Biggs, Cilliers, Vermaak, and Masterson farm boreholes. In 2024, the contractors abstracted 14 992 m^3 at Steynburg farm (Impofu West), 4 774 m^3 at Biggs farm (Impofu North), and 8 041 m^3 at Cilliers farm (Impofu West). The contractors have started a new cycle of the water abstraction readings in 2025. Water readings taken on the 18th of January 2025 show that they have abstracted 3 448 m^3 at Steynburg farm (Impofu West), 10 m^3 at Biggs farm (Impofu North), 1 887 m^3 at Cilliers farm (Impofu West), 185 m^3 at Vermaak farm (Impofu West), and 953 m^3 at Masterson farm (Impofu East) during this reporting period. Water from the boreholes is used for dust suppression of access roads as well as other work areas and to flush toilets at the site camp. The water is also used for dilution of the bio-security cleaning agent for the Foot and Mouth Disease on farms. At the site camp, filtration system for consumption is currently in use and certificate of analysis for the water was received on 26 July 2024 from Talbot Laboratories (Pty) Ltd. The parameters tested on the sample submitted (021321/24 and 021322/24) conform to the SANS 241:2015 requirements for drinking water.

Water Use Authorisations Compliance Monitoring

The water use licence (WUL) authorisations were granted in terms of GAs by the Department of Water and Sanitation (DWS) in terms of the National Water Act 36 of 1998 for the following water uses, Section 22(1) (a) (iii): a person may only use water without a licence if that water is permissible under schedule I; if that water use is permissible in terms of a general authorisation issued under section 39. The Water Use is for the abstraction of water from a registered dam that was used during construction and for disposing sewage waste into the conservancy tank at the site camp. Abstraction of water from boreholes commenced and the contractor monitors water use. Registered water uses are section 21 (c, i, and g), for North there are 41 water uses, West with 50, and East with 46.



Figure 2: Dust suppression undertaken at Road East 3.

4.4 SITE ASSESSMENT

The audit was conducted on the 21st and 23rd of January 2025. Activities for this reporting period included the following:

- **Foundations**: WTG excavations, rock breaking in WTGs, WTG recess and duct trenching, WTG rock removal, cleaning WTG bases and installing ducts, concrete blinding and recess pouring, WTG steel fixing and shutter installation on, foundation inner and outer shutter installations, dewatering WTG excavations, foundation cast main pour at WTG W16, W19, and N19, WTG backfilling, and rigid Inclusions as well as pilling at WTG W17,
- **Crane pads and platforms**: bulk earthworks on platforms, clearing and grubbing, crane pad bulk earthworks, delivering of blade fingers,
- **Access Roads**: Trimming of trees and drainage construction on internal roads, bulk earthworks and processing internal roads as well as Security Bellmouths, load and haul of G5 material, stormwater installations, culvert installations on District Road (DR1765 and MN50032) and internal roads,
- **Other activities**: Relocation of existing services, i.e. fences and water troughs, installation of fences and cattle grid, removing stockpiles and hauling excess material to spoil, bulk earthworks cut to fill and process, importing wearing course, topsoil reinstatement. Power has commenced with installation of permanent signage as well as Crane pad handover.

Brand Besamandla currently works in all substations, and MV cable installations. Activities underway include the following:

- **West Substation**:
  - Setting out for building works
  - Earth grid installation
- **Powfontein Substation**:
  - Setting out for building works
- **North Substation**:
  - Building foundation works.
- **East Substation**:
  - Building foundation works
  - Drilling of copper and brazing .
- **MV Cable installation**
  - Cable installation at North section
  - Trenching at North section.

- **Met Mast**
    - Steel and reinforcement
    - Concrete casting at North
    - Earthing for anchors

Nordex is currently delivering tools for the main assembly and material for installation, as well a site establishment.



Figure 3: Culvert construction at RW5 completed



Figure 4: Bitumen Brickwork waterproof coating stored at the laydown area.



Figure 5: WTG N2 ready for handover.



Figure 6: Hauling excess material to spoil area.



Figure 7: Rigid inclusions at WTG W17



Figure 8: Reinstated topsoil at RN17.



Figure 9: Main concrete pour completed at WTG W16.



Figure 10: Setting out for buildings at Powfontein substation.



Figure 11: Road maintenance at RE3.



Figure 12: Preparations for delivering turbine components at the Buffer Yard.

5 RESULTS OF THE AUDIT / LEGAL COMPLIANCE

EIMS have been appointed to undertake legal compliance audits in terms of the EA, GA and EMPr of the Impofu Wind Farms and associated infrastructure. The results of the monthly ECO Audit are provided in this section of the report. The compliance summary, areas of good compliance, areas of concern and areas of non-compliance are provided in sections 5.1, 5.2, 5.3 and 5.4 respectively.

5.1 COMPLIANCE SUMMARY

The straight compliance score is calculated based on the compliance with the relevant conditions (i.e., yes or no). The weighted compliance score is calculated by using the compliance rating protocol (0, 2, 4) and scoring the individual conditions and calculating the percentage compliance.

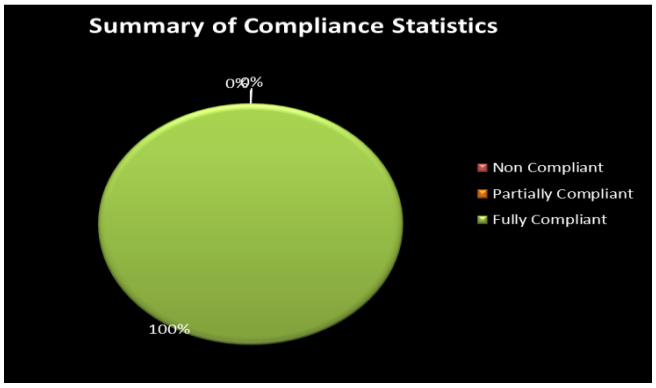


Figure 13: Summary of compliance with the requirements of the EA (Power Construction).

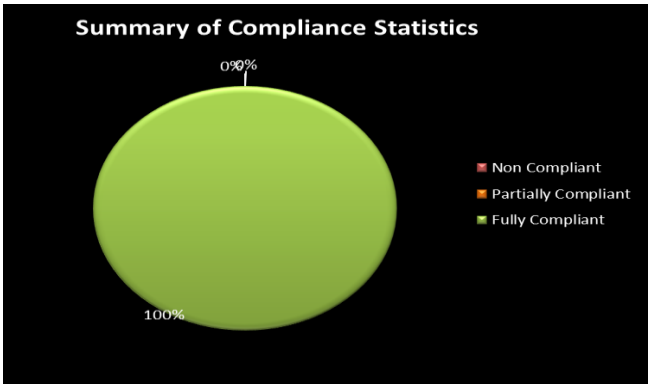


Figure 14: Summary of compliance with the requirements of the EA (Nordex).

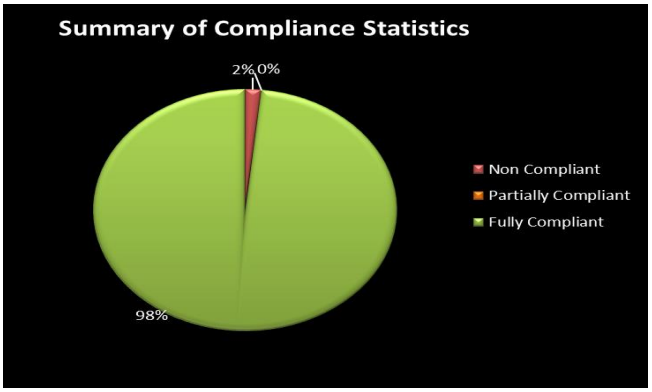


Figure 15: Summary of compliance with the requirements of the EMPr (Power Construction).

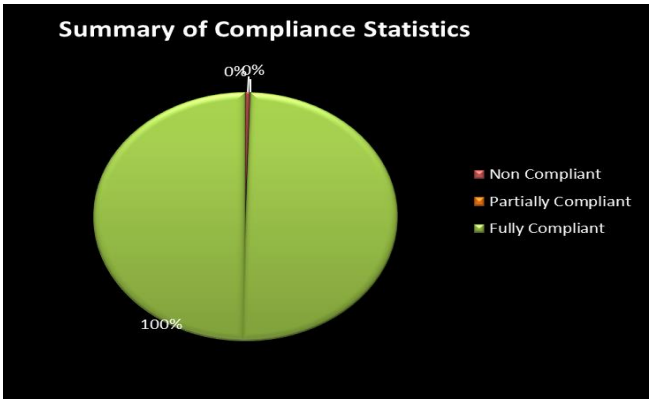


Figure 16: Summary of compliance with the requirements of the EMPr (Nordex).

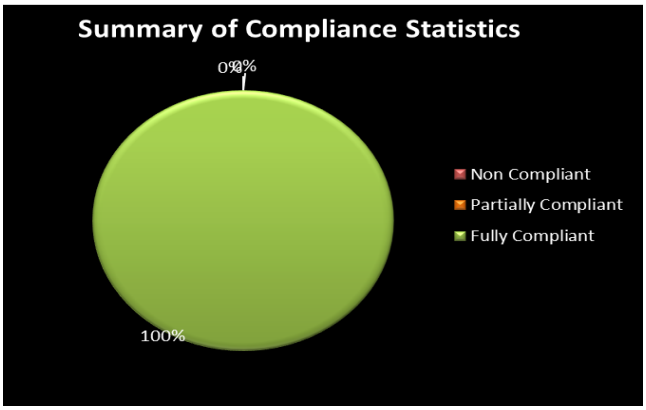


Figure 17: Summary of compliance with the requirements of the EMPr (Brand Besamandla).

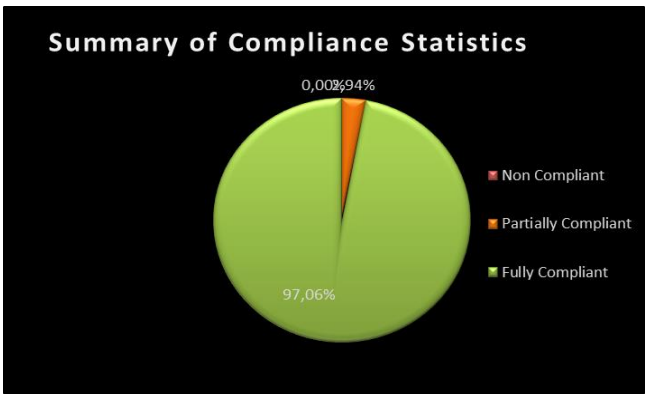


Figure 18: Summary of compliance with the requirements of the Water Use Authorisations (GA) (Power Construction).

5.2 GOOD COMPLIANCES

Table 2: List of Good Compliances recorded during this reporting period.

Location	Category	Responsible Party	Description	Photo Reference
Main site camp at Impofu west	Pollution control	Power Construction	Refuelling undertaken in an appropriate and adequate ground-protected area and drip tray placed at Power site camp.	 Figure 19: Refuelling on an impermeable surface at Power site camp.
Main site camp at Impofu West	Hazardous Chemical Substances (HCS) management	Power Construction	HCS storage bund kept clean at the site camp.	 Figure 20: HCS storage bund kept clean at the main camp.

Location	Category	Responsible Party	Description	Photo Reference
Nordex site camp at Impofu West	Waste management	Nordex	Sufficient waste bins delivered at the site camp to be used in working areas.	 Figure 21: Sufficient waste bins delivered at Nordex site camp.
Nordex site camp at Impofu West	Ablution facilities	Nordex	Chemical flushable toilets provided at Nordex site camp.	 Figure 22: Chemical flushable toilets provided at Nordex site camp.

Location	Category	Responsible Party	Description	Photo Reference
Met Mast near WTG W16	Soil management	Brand Besamandla	Topsoil and subsoil separated at Met Mast excavation near WTG W16.	 Figure 23: Topsoil and subsoil separated at Met Mast excavation near WTG W16.

5.3 AREAS OF CONCERN

Two (2) new concerns were raised during this reporting period. Poor housekeeping next to Labco offices, and bitumen brickwork waterproof coating (Brixeal) was not stored in a bunded area where accidental leakage can be avoided from polluting ground. Areas of concern have the potential to become non-compliances or incidents if not adequately considered or addressed, where required.

5.4 NON-COMPLIANCES

Four (4) new non-compliances were noted during this reporting period. Three (3) NCs were raised for Power Construction and one (1) was raised for Nordex. Areas of non-compliances can be escalated to Non-Compliance Report (NCR) if not adequately addressed within the timeframes agreed to.

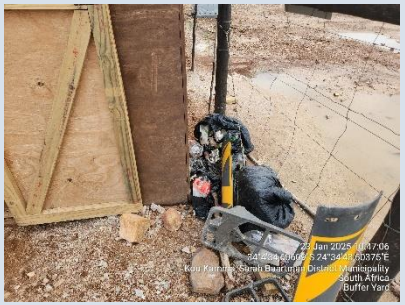
Table 3: Environmental Non-Compliances raised during the current reporting period.

Status Description	Colour Scale
Closed Out/ Corrected	
Work in Progress (WIP)	
Open/ Uncorrected	

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
029	EMPr 5.2.1.13 **For Power Construction**	All construction materials including fuels and oil should be stored in demarcated areas that are contained within berms / bunds to avoid spread of any contamination. Washing and cleaning of equipment should also be done in berms or bunds, in order to trap any cement and prevent excessive soil erosion.	Container with fuel was not placed in a bunded area at Power site camp. At WTG W17, grease stored in a HCS storage cage was overflowing to the ground.	Containers with fuel/ oil should be stored in a Hazardous Chemical Substance (HCS) storage bunded area. HCS storage cage should be placed on an impermeable surface to avoid contamination.	**Open/ Uncorrected** The contractor has to place containers with fuel/ oil in the HCS storage bund and place cage in an impermeable surface.	 Figure 24: Container with fuel placed outside a bunded area.
	EMPr 5.3.9.3	"If potentially Hazardous Chemical Substances are to be stored on site, then: •Hazardous Chemical Substances shall be stored in appropriate containers which are clearly labelled and sealed.	Container with fuel was not labelled nor placed in a bunded area at Power site camp. At WTG W17, grease stored in a HCS storage cage was	Containers with fuel/ oil should be labelled and stored in a Hazardous Chemical Substance (HCS) storage bunded area.	The contractor has to label and place containers with fuel/ oil in the HCS storage bund and place cage in an	

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
	For Power Construction	•Hazardous Chemical Substance containers shall be situated on a smooth impermeable surface (concrete or 250 micrometre (µm) plastic (plastic must have a minimum of a 5 cm layer of sand on top to prevent damage and perishing)) within an earth bund. The impermeable lining shall extend to the crest of the bund and the volume inside the bund shall be 120% of the total capacity of all the storage tanks/bowsers (110% statutory requirement plus allowance for rainfall). •Access to Hazardous Chemical Substance storage areas shall be restricted, and the areas secured with requisite warning/safety signage conforming to the requirement of SANS 1186 on display. •Disposal of these substances shall be in accordance with Section 0. •Rainwater that collects in bunded areas shall be promptly removed and dealt with as water containing waste. "	overflowing to the ground.		impermeable surface.	 Figure 25: Grease overflowing in a HCS storage cage.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
030	EMPr 5.3.9.16 **For Power Construction**	" The Contractor shall submit a Method Statement to the Contract Manager and ECO for approval of the procedure for dealing with an accidental hydrocarbon spill: •Any single spill in excess of 200 shall be reported to the Department of Water and Sanitation (DWS), and the Proponent. •The responsible operator shall have the required training to use the spill kit, or to contain the spill. •The activity causing the spill is to cease, and the spill is to be contained using a spill kit, sand berms, sandbags, sawdust, absorbent materials or similar. •Should any soil become contaminated by oil or fuel spills then the soil shall be removed. •Contaminated soil and material shall be stored in bags or sealed and labelled drums in the designated hazardous waste area of the site and disposed of in accordance with Section 0. •Any contaminated soil that cannot be removed is to be treated in situ as determined by the ECO. "	Oil spillage from a truck that was emptying conservancy tanks observed at the site camp entrance.	The contractor should clean-up the spillage and store contaminated soil in the labelled drums in the designated waste storage area at the site camp.	**Open/ Uncorrected** The contractor has to clean-up the spill and provide proof.	 Figure 26: Oil spillage at site camp entrance gate.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
031	EMPr 5.3.15.7 **For Nordex**	"Precautions shall be taken to avoid any waste from spreading on, or from, the site. •Scavenger and weatherproof bins with lids shall be provided at the contractor's camp, of sufficient number and capacity to store the general domestic waste produced on a daily basis. •Bins shall not be allowed to become overfull and shall be emptied regularly at the waste storages areas in the Contractor's camp, or directly transferred to an approved landfill. "	The contractor has not provided enough waste bins at the Buffer yard, waste was observed inappropriately stored next to a guard room.	The contractor should ensure that waste bins are provided to store waste appropriately and avoid waste being blown by wind.	**Open/ Uncorrected** The contractor has provide a waste bin near the guard room.	 Figure 27: General waste next to guard room at the Buffer Yard.
032	EMPr 5.3.9.16.1 **For Power Construction**	"All reasonable measures shall be taken to limit erosion. •The most effective way to control erosion is to retain the existing vegetation for as long as possible. Hence, site clearance shall be undertaken in a phased approach wherever possible such that the extent of exposed soils shall be limited to areas of the current construction phase. •Special attention shall be given to ensure the protection of topsoil, overburden, spoil and materials	Erosion observed near Power main site camp entrance where the contractor is parking on top of reinstated topsoil.	The contractor should remove topsoil to avoid it being damaged further. The topsoil must be stored appropriately for use during rehabilitation.	**Open/ Uncorrected** The contractor has to remove topsoil to use it later for rehabilitation.	 Figure 28: Erosion observed in an area used for parking.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		stockpiles from the erosive elements. •Any runnels or erosion channels developed during the construction period or during the vegetation establishment period shall be backfilled and compacted, and the areas restored to a proper condition. •Stabilisation of cleared areas to prevent and control erosion shall be pro-actively managed by the Contractor. Any relevant requirements stipulated by a Water Use Authorisation must also be implemented, if applicable. "				

5.5 NON-COMPLIANCE REPORTS

Non-Compliance Reports (NCRs) are issued to the project or relevant contractor if the recorded NCs are not addressed in the agreed timeframes. Zero (0) NCRs were issued during the current reporting period.

5.6 STATUS OF NON-COMPLIANCES REPORTED DURING PREVIOUS REPORTING PERIODS

This section provides the status of the non-compliances that were raised during the previous ECO Audits. The ECO recorded one (1) non-compliance during the previous audit.

Table 4: Environmental Non-Compliances raised during the previous reporting period.

Status Description	Colour Scale
Closed-Out/ Corrected	
Work in Progress (WIP)	
Open/ Uncorrected	

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
004	GA 8(b)	Water users are further required to register on www.dws.goc.za/dir_ws/wsmenu and upload all documents applicable to the full project lifecycle including baseline water quality data and monthly monitoring data against baseline as required in terms of paragraph (5) on the departmental Integrated Regulatory Information System.	Water user has not registered on the DWS website.	The water user is advised to register on the DWS website and/or engage the DWS with regards to the validity of the website.	**Work in Progress** EGP has sent an enquiry to the Department about the website because it does not work.	N/A
028	EMPr 5.3.11.2	"Materials in transit shall be appropriately secured to ensure safe passage between destinations:	Super Crush trucks that are transporting	Truck transporting material should be covered to	**Closed-Out/ Corrected**	N/A

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
	For Power Construction	•Loads, including but not limited to, sand, stone chip, fine vegetation, refuse, paper and cement, shall have appropriate cover to prevent them spilling from the vehicle during transit. •The Contractor shall be responsible for any clean up resulting from the failure by employees or suppliers to properly secure transported materials. "	gravel to site do not cover the trucks and the wind blows the material.	prevent the material from spilling over.	The contractor communicated with Super Crush trucks that are transporting gravel to site, the trucks cannot be covered so the contractor has advised them not to overload so that the material cannot be blown by wind.	

5.7 INCIDENTS

One (1) new incident was reported during this reporting period. An oil spill was identified by the ECO and Power Environmental Manager during the ECO monthly audit at the site camp entrance, the spill was from a truck that was servicing conservancy tanks in the morning. The contractor is advised to report all environmental incidents to the ECO for monitoring of requisite remedial action undertaken by the contractor following an incident.

5.8 COMPLAINTS

Two (2) new complaints were reported to the ECO during this reporting period. On the 12th of January 2025, a farmer reported that a boundary gate was left open between Vernon Basson and Bloekomlaan. Picture evidence was retrieved as Power Construction closed the gate after shift on 11 January 2024. On the 16th of January 2025, CC Crane Hire worker hooting at cow crossing the road and going wild which resulted in cow running all over the place. Power Site Agent approached CC Crane Hire requesting disciplinary actions to be taken and evidence to be shared with him that disciplinary actions have been taken.. It should be noted that all complaints should be reported to the ECO as soon as they occur.



6 CONCLUSION

The contractor is encouraged to continue to comply with all applicable environmental specifications while implementing positive environmental impact mitigation and environmental initiatives where possible.

Table 5: Summary of observations noted.

Description	Number Raised during Reporting Period	Total Number Raised	Total Number Open/ Uncorrected
Areas of Concern	**2**	**13**	**2**
Non-compliances	**4**	**32**	**5**
Non-compliance Reports	**0**	**0**	**0**
Incidents	**1**	**12**	**0**
Complaints	**2**	**12**	**1**

7 ASSUMPTIONS AND LIMITATIONS

The following assumptions and limitations apply to this report:

- The information contained in this report was sourced from information and data supplied by third parties that is assumed to be complete, valid, and true.
- This report is based on information available at the time. The information, data, observations, and evidence this report is based on is beyond the control of EIMS and may change without notice. EIMS will not be liable for any loss or damage which may arise directly or indirectly because of such changes.
- No representation or warranty, express or implied, is or will be made in relation to, and no responsibility or liability is or will be accepted by EIMS in relation to the accuracy of this report.
- Where reference is made to legislation or other statutory provisions in this report the original legislation or other statutory provisions will always take precedence, and the reader is directed to revert to the original legislation or statutes.