EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

T 011 789 7170 E info@eims.co.za W www.eims.co.za

APRIL 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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CHECKED:	Sikhumbuzo Mahlangu	Sent Electronically	2025/05/09
AUTHORIZED:	Liam Whitlow	Sent Electronically	2025/05/09

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Table of Contents

1 INTRODUCTION 5
1.1 DETAILS OF THE HOLDER 5
1.2 BRIEF PROJECT DESCRIPTION 6
1.3 PROJECT PROGRESS 8
2 DETAILS OF THE ECO 9
2.1 EXPERTISE OF THE ECO 9
2.2 DECLARATION OF INDEPENDENCE 9
3 SCOPE, PURPOSE AND OBJECTIVE OF THE AUDIT 10
4 AUDIT METHODOLOGY 10
4.1 PROCEDURE FOR THE AUDIT 10
4.2 EVALUATION CRITERIA USED DURING THE AUDIT 11
4.3 DOCUMENTATION REVIEW 11
4.4 SITE ASSESSMENT 14
5 RESULTS OF THE AUDIT / LEGAL COMPLIANCE 18
5.1 COMPLIANCE SUMMARY 18
5.2 GOOD COMPLIANCES 22
5.3 AREAS OF CONCERN 24
5.4 NON-COMPLIANCES 25
5.5 NON-COMPLIANCE REPORTS 30
5.6 AVIFAUNAL MONITORING 30
5.7 STATUS OF NON-COMPLIANCES REPORTED DURING PREVIOUS REPORTING PERIODS 31
5.8 INCIDENTS 45
5.9 COMPLAINTS 45
6 CONCLUSION 46
7 ASSUMPTIONS AND LIMITATIONS 46

List of Tables

Table 1: Details of the holder. 5
Table 2: List of Good Compliances recorded during this reporting period. 22
Table 3: Environmental Non-Compliances raised during the current reporting period. 25
Table 4: Environmental Non-Compliances raised during the previous reporting period. 31
Table 5: Summary of observations noted. 46

Figures

Figure 1: Impofu Cluster boundaries 7

Figure 2: Culvert installed at RE3. 14
Figure 3: Drilling at WTG W17. 15
Figure 4: Topsoil reinstatement at Road West 17 15
Figure 5: Cattle grid construction at Road Wet 17. 16
Figure 6: Rebar setting at WTG W10. 16
Figure 7: Bricklaying of buildings at West substation. 16
Figure 8: Columns erected at West substation. 16
Figure 9: MV cable installation at Road North 1. 16
Figure 10: MV cable laying at Impofu East Wind Farm. 16
Figure 11: Casting concrete at East substation. 17
Figure 12: Met mast installation at Impofu East. 17
Figure 13: Pre-loading milk run trucks at the buffer yard. 17
Figure 14: Pre-assembly of internals at the buffer yard. 17
Figure 15: Pre-assembly of concrete towers at WTG N15. 17
Figure 16: Tower assembly and grouting at WTG N12. 17
Figure 17: Chemical casting and grouting at WTG N1. 18
Figure 18: Tower assembly at WTG N6. 18
Figure 19: Installation of concervancy tanks at Nordex site camp. 18
Figure 20: Milkwood Tree pruned at District Road MN50032. 18
Figure 21: Summary of compliance with the requirements of the **Impofu West EA** (Power Construction). 19
Figure 22: Summary of compliance with the requirements of the **Impofu West EMPr** (Power Construction). 19
Figure 23: Summary of compliance with the requirements of the **Impofu East EA** (Power Construction). 19
Figure 24: Summary of compliance with the requirements of the **Impofu East EMPr** (Power Construction). 19
Figure 25: Summary of compliance with the requirements of the **Impofu North EA** (Power Construction). 19
Figure 26: Summary of compliance with the requirements of the **Impofu North EMPr** (Power Construction). 19
Figure 27: Summary of compliance with the requirements of the **Impofu North EA** (Nordex) 20
Figure 28: Summary of compliance with the requirements of the **Impofu North EMPr** (Nordex) 20
Figure 29: Summary of compliance with the requirements of the **Impofu West EA** (Nordex) 20
Figure 30: Summary of compliance with the requirements of the **Impofu West EMPr** (Nordex) 20
Figure 31: Summary of compliance with the requirements of the **Buffer Yard EA** (Nordex) 20
Figure 32: Summary of compliance with the requirements of the **Buffer Yard EMPr** (Nordex). 20
Figure 33: Summary of compliance with the requirements of the **Substations EMPr** (Brand Besamandla). 21
Figure 34: Summary of compliance with the requirements of the **Water Use Authorisations (GA)** (Power Construction). 21
Figure 35: Dust suppression at WTG E13. 22
Figure 36: Chemical toilets being serviced at East substation. 22
Figure 37: Rebar placed in one area neatly at WTG W17. 23

Figure 38: Drip trays placed under parked trucks at the buffer yard. 23
Figure 39: Drip tray not placed under a leaking diesel bower. 25
Figure 40: Damaged cement bags observed at WTG W17. 27
Figure 41: Waste not appropriately at WTG N6. 28
Figure 42: Oil waste not stored in a bunded area at the Buffer Yard. 29
Figure 43: Silt trap installed during de-watering at WTG E8. 31
Figure 44: Spill kit provided at Nordex warehouse. 33
Figure 46: Toilet anchored to the ground at Nordex site camp. 33
Figure 47: Drip tray placed under generator at the Buffer Yard. 34
Figure 48: Skip with general waste not covered at the buffer yard. 35
Figure 49: Brixeal that was placed next to a container has been removed. 37
Figure 50: Good housekeeping practiced. 39
Figure 51: Broken drip tray placed under a generator was replaced at WTG E13. 39
Figure 52: Toilet not anchored to the ground at RN1. 40
Figure 53: Waste not stored appropriately at WTG N1. 41
Figure 54: Waste separation done appropriately at West substation. 43
Figure 55: Hazardous substances stored in a bunded area at East substation. 43
Figure 56: Broken drip tray replaced under water pump at West substation. 44
Figure 57: Fire extinguisher provided in a smoking area at East and West substation. 44

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
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

Abbreviation	Item
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 April 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 Manuele Battisti
Head Office Physical Address	2017/118197/07
Head Office Telephone Number	102 Rivonia Road Sandton Johannesburg 2196
Head Office Fax Number	(010) 344 0388
Head Office Contact Person	Mr Manuele Battisti
Operations Physical Address	Impofu Wind Farm Cluster
Operations Telephone number	083 268 1963
Operations Contact Person	Mr Sadao Chika

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 4.3 for additional permits.

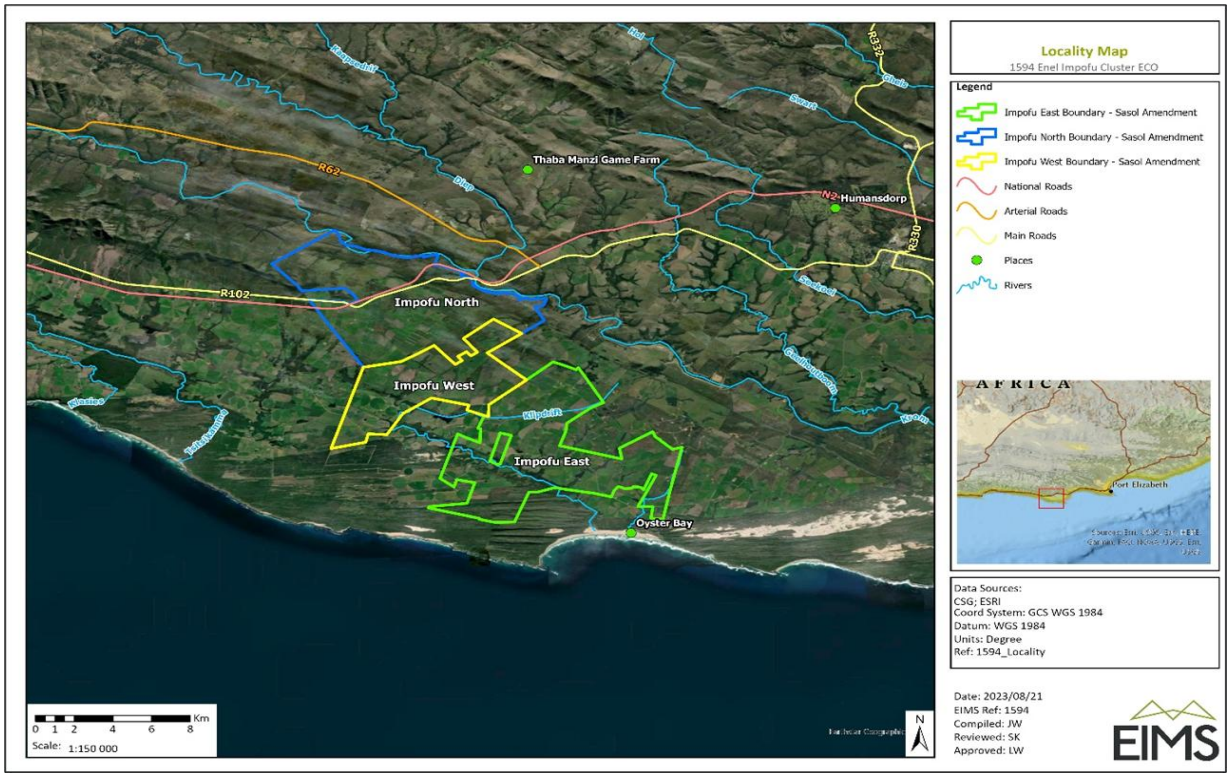


Figure 1: Impofu Cluster boundaries

The 112.1MW 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, Lucon Civils for trenching, and Keller appointed Sterns Drilling for drilling at WTG W17. 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) for control building as well as Eskom Building, M&T Solutions for Met Mast installation, and Imvelenhle Consulting and Engineering as well as RenPower for MV cable installation. Nordex has appointed Johnson Crane Hire to provide 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 where environmental aspects are discussed. During progress meetings, environmental issues are also discussed. HSE meetings are held once weekly. Construction of the following is underway:

- WTG foundation;
- Crane pads;

- Access roads;
- North substation;
- East substation;
- Powfontein substation;
- West substation;
- MV reticulation;
- Met mast excavations and installation;
- Internal overhead line foundations and installation of mono poles;
- Delivering of turbine components at the buffer yard and WTG areas; and
- Turbines pre-assembly and installation.

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.
- The 3rd amendment of the EA for the 189 MW Impofu East Wind Energy Facility (reference Number: 14/12/16/3/3/2/1104/AM3) was approved by DFFE on the 24th of February 2025.
- The 3rd amendment of the EA for the 182MW Impofu North Wind Energy Facility (reference Number: 14/12/16/3/3/2/1102/AM3) was approved by DFFE on the 07th of March 2025.
- The 3rd amendment of the EA for the 168MW Impofu West Wind Energy Facility (reference Number: 14/12/16/3/3/2/1103/AM3) was approved by DFFE on the 07th of March 2025.
- 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 24 m^3 of general waste was collected from site and disposed at the landfill site on the 19th and 20th of March 2025 as well as 03rd, and 07th of April 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. Isiviko Construction (Pty) Ltd, Power Buildings subcontractor dispose waste at Power Construction waste management area.

Nordex has appointed an independent service provider, Zumbe Services (Pty) Ltd who has appointed 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 18 m^3 of general waste was collected from site and disposed at the landfill site on the 14th, 25th, and 26th of March 2025.

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, no hazardous waste required disposal.

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 disposes effluent at Jeffreys Bay Wastewater Treatment Works under Kouga Local Municipality (Licence number: 12/K90F/EF/4333). During this reporting period, Bidvest collected 31 m^3 of effluent for disposal from servicing toilets from the 19th 31st of March 2025 as well as 01st to 05th April 2025. SW pumped and disposed a total of 50 m^3 of sewage from servicing the conservancy tank on the 19th, 21st, 24th, and 27th of March 2025 as well as 03rd of April 2025 (10 m^3 on each day). Waste disposal certificates are available in the contractor's environmental file.

At the substations (North, East, West, and Powfontein), Brand Besamandla, Power Buildings, Imvelenhle, and Renpower 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 serviced twice a week. During this reporting period, Bidvest collected 1,4m^3 of effluent for disposal from servicing toilets on the 15th, 18th,22nd, 27th, and 29th of March 2025 as well as from 1st to 4th, and 7th of April 2025 from all the mentioned contractors.

M&T Solution has appointed Bidvest as their service provider because Multi Tool Hire cannot produce disposal manifests from the Municipality.

Nordex 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 supposed to be serviced twice a week. During this reporting period, Bidvest collected 0,6 m^3 of effluent for disposal from servicing toilets on the 28th March 2025 as well as 1st and 4th of April 2025.

Johnson Crane Hire has appointed a service provider, Women of Strength to provide ablution facilities who has appointed Bidvest 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/2021/005). During this reporting period, Bidvest disposed 0,6 m^3 of effluent from servicing toilets from the 28th to 31st of March 2025 as well as 01st to 04th April 2025.

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. Water readings taken on the 04th of April 2025 show that they have abstracted 10 358 m^3 at Steynburg farm (Impofu West), 786 m^3 at Biggs farm (Impofu North), 9 840 m^3 at Cilliers farm (Impofu West), 4 281 m^3 at Vermaak farm (Impofu West), and 5 916 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. Power abstracted 329 m^3 of water from Oyster Bay Dam from the 04th to 27th March2025. The water from the dam was used for dust suppression at Impofu East. The water from the boreholes 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 regularly records the water used. Registered water uses are section 21 (c, i, and g), for Impofu North there are 41 water uses, Impofu West with 50, and Impofu East with 46.



Figure 2: Culvert installed at RE3.

4.4 SITE ASSESSMENT

The audit was conducted on the 07th and 10th of April 2025. Activities for this reporting period include 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, dewatering WTG excavations, foundation cast main pour at WTG E16, W10WTG backfilling, and rigid inclusions remedial works at WTG W17, steel delivery.
- **Crane pads and platforms**: Bulk earthworks on platforms, clearing and grubbing, crane pad bulk earthworks, construction of blade fingers.
- **Access Roads**: Trimming of trees and drainage construction on internal roads as well as pruning of Milkwood Tree at MN50032, bulk earthworks and processing internal roads as well as Security Bellmouths, load and haul of G5 material, stormwater installations, culvert installations and upgrading of District Roads (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 material, topsoil reinstatement, hydro demolition on WTG platform, 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**:
    - Bricklaying for the Eskom, IPP building, O&M, and Hazardous waste;
    - Steel fixing; and
    - Construction of subsoil drainage system.
- **Powfontein Substation**:

    - Steel fixing for the columns;
    - Bricklaying for the Eskom building;
    - Concrete pouring for the columns; and
    - Joining of copper tails.
- **North Substation**:
    - Casting of IPP relay room floors;
    - Casting of Eskom battery room floors;
    - Assembly and erection of columns; and
    - Excavation and erection of columns.
- **East Substation**:
    - Bricklaying of O&M building;
    - Installation of eaves on the Eskom building;
    - Casting concrete on the IPP section;
    - Casting concrete on manholes;
    - Excavation of isolators; and
    - Brazing of flat copper.
- **MV Cable installation**
    - Cable trenching and installation at the North, East, and West Wind Farms.
- **Met Mast**
    - Rigging of the temporary met mast at Impofu East Wind Farm.

Nordex is currently undertaking the following activities:

- Delivering components for the main assembly and material for installation;
- Site establishment;
- Pre-assembly of internals, pre-loading milk run trucks, and transportation of keystones;
- Pre-assembling of concrete tower section at WTG N2 and N15;
- Tower assembly and grouting at N1, N6, N9, and N12; and
- Preparation of a hub at WTG N7.



Figure 3: Drilling at WTG W17.



Figure 4: Topsoil reinstatement at Road West 17



Figure 5: Cattle grid construction at Road Wet 17.



Figure 6: Rebar setting at WTG W10.



Figure 7: Bricklaying of buildings at West substation.



Figure 8: Columns erected at West substation.



Figure 9: MV cable installation at Road North 1.



Figure 10: MV cable laying at Impofu East Wind Farm.



Figure 11: Casting concrete at East substation.



Figure 12: Met mast installation at Impofu East.



Figure 13: Pre-loading milk run trucks at the buffer yard.



Figure 14: Pre-assembly of internals at the buffer yard.



Figure 15: Pre-assembly of concrete towers at WTG N15.



Figure 16: Tower assembly and grouting at WTG N12.

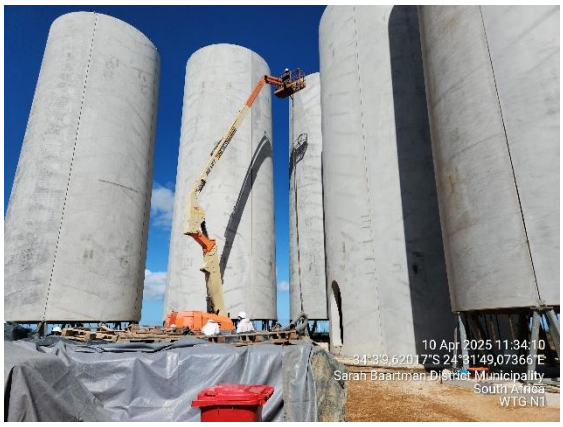


Figure 17: Chemical casting and grouting at WTG N1.



Figure 18: Tower assembly at WTG N6.



Figure 19: Installation of concervancy tanks at Nordex site camp.



Figure 20: Milkwood Tree pruned at District Road MN50032.

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.

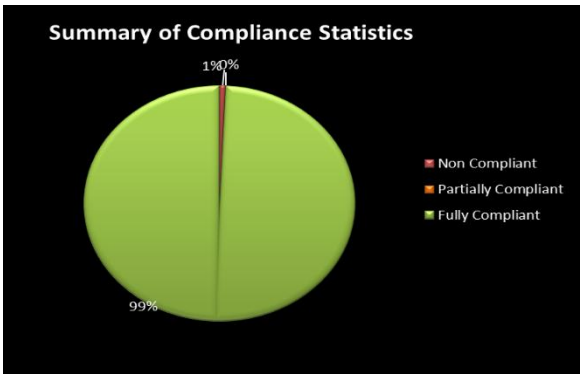


Figure 21: Summary of compliance with the requirements of the **Impofu West EA** (Power Construction).

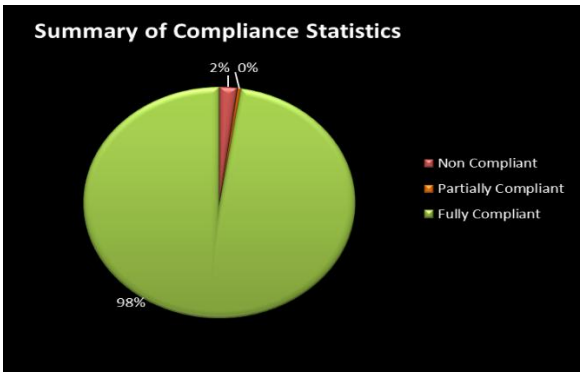


Figure 22: Summary of compliance with the requirements of the **Impofu West EMPr** (Power Construction).

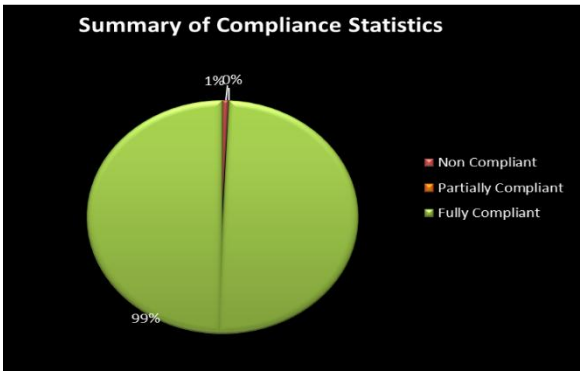


Figure 23: Summary of compliance with the requirements of the **Impofu East EA** (Power Construction).

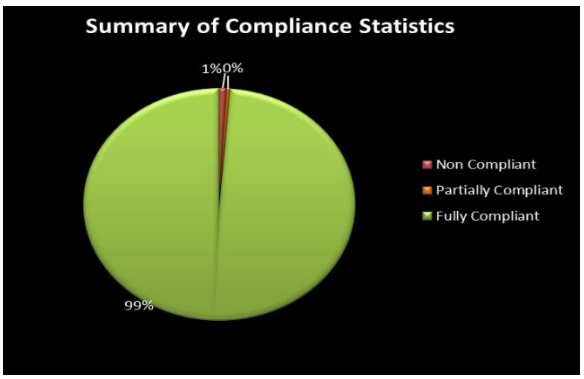


Figure 24: Summary of compliance with the requirements of the **Impofu East EMPr** (Power Construction).

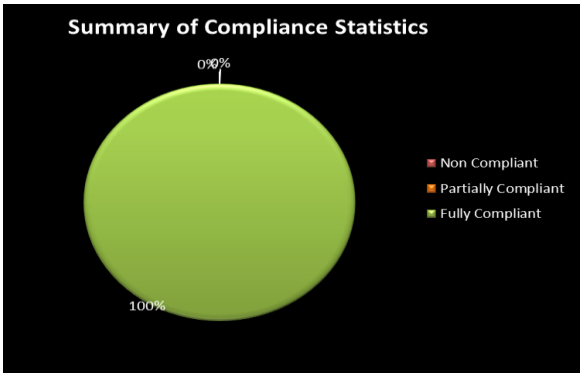


Figure 25: Summary of compliance with the requirements of the **Impofu North EA** (Power Construction).

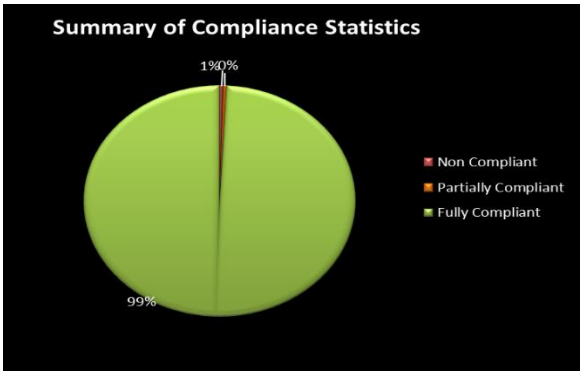


Figure 26: Summary of compliance with the requirements of the **Impofu North EMPr** (Power Construction).

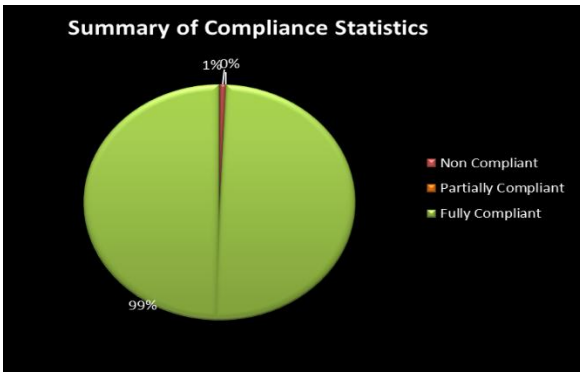


Figure 27: Summary of compliance with the requirements of the **Impofu North EA** (Nordex)

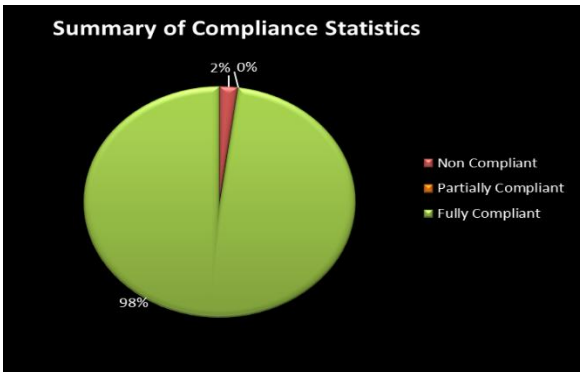


Figure 28: Summary of compliance with the requirements of the **Impofu North EMPr** (Nordex)

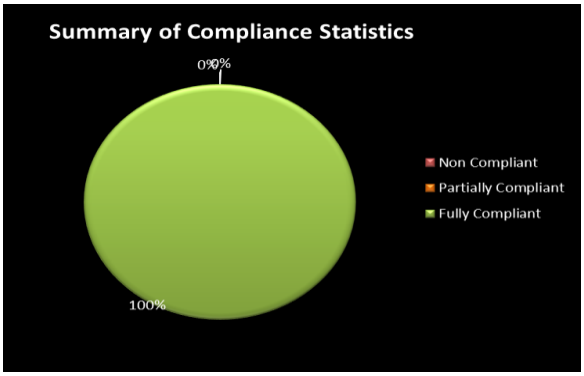


Figure 29: Summary of compliance with the requirements of the **Impofu West EA** (Nordex)

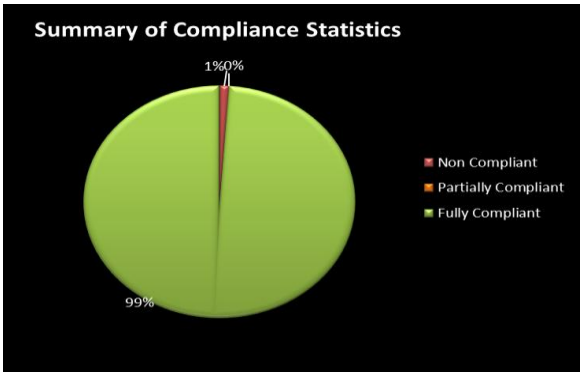


Figure 30: Summary of compliance with the requirements of the **Impofu West EMPr** (Nordex)

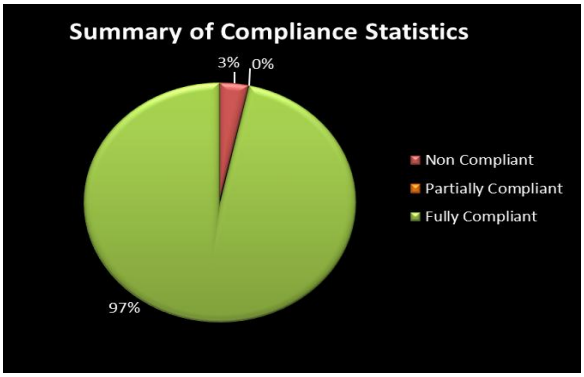


Figure 31: Summary of compliance with the requirements of the **Buffer Yard EA** (Nordex).

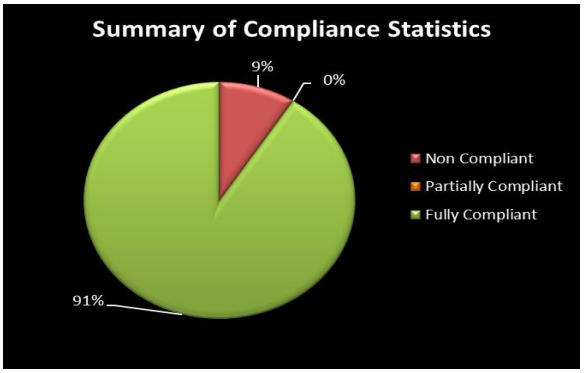


Figure 32: Summary of compliance with the requirements of the **Buffer Yard EMPr** (Nordex).

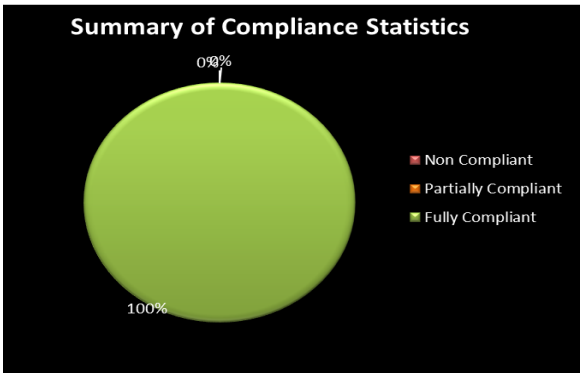


Figure 33: Summary of compliance with the requirements of the **Substations EMPr** (Brand Besamandla).

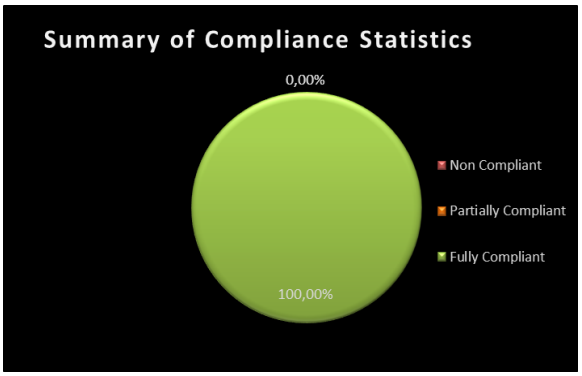


Figure 34: Summary of compliance with the requirements of the **Water Use Authorisations (GA)** (Power Construction).

5.2 GOOD COMPLIANCES

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

Location	Category	Responsible Party	Description	Photo Reference
WTG E13	Pollution control	Power Construction	Dust suppression done at WTG E13.	 Figure 35: Dust suppression at WTG E13.
East substation	Ablution facilities	Brand Besamandla	Chemical toilets being serviced at East substation.	 Figure 36: Chemical toilets being serviced at East substation.

Location	Category	Responsible Party	Description	Photo Reference
WTG W17	Housekeeping	Power Construction	Rebar placed in one area neatly at WTG W17.	 Figure 37: Rebar placed in one area neatly at WTG W17.
Buffer Yard	Pollution prevention	Nordex	Drip trays placed under parked trucks at the buffer yard.	 Figure 38: Drip trays placed under parked trucks at the buffer yard.

5.3 AREAS OF CONCERN

Two (02) new concerns were raised during this reporting period. Excavations for MV cable being left open for a long period in areas where there is livestock. Stormwater dissemination stones in areas with sandy soil, sand will be washed by water during rainy days and wash off to farmers' fields. 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 (04) new non-compliances were noted during this reporting period. Two (02) NCs were raised for Power Construction, and two (02) 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
053	EA 108 **For Power Construction** EMPr 5.3.9.9 **For Power Construction** EMPr 5.3.9.14 **For Power Construction**	Leakage of fuel must be avoided at all times and if spillage occurs, it must be remedied immediately. Where refuelling away from the dedicated refuelling station is required, a mobile refuelling unit shall be used and appropriate and adequate ground-protection such as drip trays used. 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	Fuel spillages were observed at WTG W17, E13 and at the site camp. Drip tray not placed under diesel bowser used for refuelling by drilling team. Bowser noted leaking to the ground. No measures taken to prevent soil contamination from a leaking diesel bowser at WTG W17.	The contractor should ensure that drip tray is placed under diesel bowser and fix or replace the leaking bowser. Contaminated soil should be cleaned and stored appropriately at the waste management area for safe disposal in a registered hazardous waste facility.	**Open/ Uncorrected**	 Figure 39: Drip tray not placed under a leaking diesel bower.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		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. All vehicles and plant shall be provided with a suitably sized service pan/drip tray to be used to effectively trap fuel leaks in the event of a breakdown.				
	EMPr 5.3.12.5 **For Power**					

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
	Construction	• Drip trays shall be provided for all plant including stationary plant (such as compressors) and for "parked" plant (such as scrapers, loaders or any vehicle).				
054	EMPr 5.3.10.2 **For Power Construction** EMPr 5.3.10.4 **For Power Construction**	Cement powder has a high pH, and spillage of cement powder and concrete slurry can affect soil and water pH. Spillage on permeable surfaces shall be prevented, and cement laden water/runoff shall be collected and disposed of as water containing waste. Bagged cement shall be stored at an appropriate facility, and empty cement bags shall be soundly secured with adequate binding material should these be stored on site.	Damaged cement bags were observed causing ground pollution at WTG W17. Bagged cement was not stored appropriately.	Where possible, the contractor should fence cement laydown areas to prevent livestock from damaging the bagged cement.	**Open/ Uncorrected**	 Figure 40: Damaged cement bags observed at WTG W17.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
055	EA 115 **For Nordex** EMPr 5.3.15.6 **For Nordex**	An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate reduction, recycling and re-use options where appropriate. Where solid waste is disposed of, such disposal shall only occur at a landfill licensed in terms of section 20(b) of the National Environment Management Waste Act, 2008 (Act 59 of 2008). Appropriate general waste (e.g. construction debris, rubble, timber, tins, drums and domestic waste) collection, storage and removal from site shall be implemented. • Waste shall be removed daily from areas remote from camp and transferred to the appropriate waste storage facility. • All non-recyclable litter and refuse shall be disposed of off-site at a licensed landfill facility approved by the Contract Manager and ECO.	An integrated waste management approach not implemented as waste was not stored appropriately at WTG N6 and N1.	The contractor should store all waste in the skips at the buffer yard for safe disposal in a registered landfill site.	**Open/ Uncorrected**	 Figure 41: Waste not appropriately at WTG N6.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
056	EMPr 7.1 Objective 2 **For Nordex** EMPr 7.1 Objective 11 **For Nordex** EMPr 7.1 Objective 11 **For Nordex**	Ensure compliance with all national, regional and local legislation with regard to the storage, handling and disposal of hydrocarbons, chemicals, solvents and any other harmful and hazardous substances and materials. Hydrocarbon waste must be contained and stored in sealed containers within an appropriately bunded area and clearly labelled. This must be regularly removed and recycled (where possible) or disposed of at an appropriately licensed landfill site. Ensure compliance with all national, regional and local legislation with regard to the storage, handling and disposal of hydrocarbons, chemicals, solvents and any other harmful and hazardous substances and materials. The onus is on the Contractor to identify and interpret the applicable legislation. Hazardous waste to be disposed of at a registered landfill site.	Oil waste (hazardous) not stored according to legislation. Drum with oil waste was placed on top of a pallet at the Buffer Yard.	The contractor should store oil waste in a bunded area to prevent contamination in an event of an accidental spillage.	**Open/ Uncorrected**	 Figure 42: Oil waste not stored in a bunded area at the Buffer Yard.

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 AVIFAUNAL MONITORING

Avifaunal monitoring was conducted by Jon Smalie from WildSkies Ecological Services (Pty) Ltd on the 28th of September 2024. The monitoring was undertaken slightly later in 2024 breeding season due to an outbreak of Foot and Mouth Disease, which placed restrictions on movement onto farms. The survey methods were as follows:

- Drive in towards the nest valley, being vigilant at all times for eagles in flight, perched in the area or flushed from the area;
- Park and walk to a view point to the east of the nest which overlooks the valley;
- Observe the area for several hours using binoculars and spotting scope; and
- Consult with the landowner with respect to any records and/or sighting made in the area.

The following observations were made during the monitoring:

- On route to the nest an adult Martial Eagle was observed flying away (flushed) from the nest area.
- The nest tree has been quite overgrown by creepers and these obscure the nest to such an extent that the nest itself is no longer visible from this vantage point.
- The ground close to the nest tree was intensely searched, and some fresh prey remains were found. This indicated that this nest was still active at the time of the monitoring.
- The landowner reported that they had recently observed three birds foraging around the area and sometimes perched in trees in the area. It was confirmed from photos shown to him that it was most probably two adults and one juvenile.

Based on the above information, the specialist concluded that breeding was active at the nest in the 2024 season. The construction of the Impofu Wind Farms does not appear to have had any effect on these birds, and there is no action required by the project developer.

A summary of the status of breeding at this location to date was given by the avifauna specialist as follows:

- In 2019 a pair of eagles successfully raised a chick at the nest (WildSkies recorded a juvenile in the nest vicinity).
- In 2020 landowners reported seeing a juvenile in the area indicating possible breeding, although it may have been the 2019 youngster.
- In 2021 it was concluded that the nest was used, although could not confirm a fledged young eagle.
- In 2022 it was concluded that no breeding took place.
- In 2023 there was no information.
- In 2024, breeding took place, possibly with a young bird fledged successfully.

These large eagles do not always breed every year, sometimes skipping a year. Importantly this breeding territory appears to have been occupied consistently for five years (2019 – 2024). A follow up site visit / monitoring event is proposed during the eagles breeding season in late May/June 2025.

5.7 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 ten (10) 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
034	EMPr 5.3.7.4 **For Power Construction**	"Should any de-watering activities be required then a Method Statement shall be submitted to the ECO for approval prior to these activities occurring: •De-watering activities shall not impact negatively on any adjacent water resource. •Sediment and pollution control measures shall be implemented. "	Silt trap not provided during de-watering at WTG E1.	The contractor should always ensure that silt trap is used during de-watering to prevent sedimentation and pollution. Kindly note that this is a reoccurring finding, it should be rectified and not noted during the next audit or the ECO will issue a NCR.	**Closed-Out/ Corrected** The contractor installed silt trap during de-watering and send proof to the ECO.	 Figure 43: Silt trap installed during de-watering at WTG E8.
035	EMPr 5.2.1.38	The contractor must supply the appointed archaeologist with the construction programme at least	The contractor shares the construction	The archaeologist subsequently visited the site for	**Work in Progress**	N/A

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
		4 weeks before construction starts to ensure the monitoring can be properly planned.	programme with the EA Holder on regular basis. However, this programme was not shared with the ECO and/or appointed archaeologist resulting in construction works being undertaken in areas that required specialist monitoring in the absence of the specialist.	monitoring. The ECO is awaiting finalisation of the specialist report and recommendations from the provincial authority in this regard.	An Archaeologist was notified about construction works and conducted monitoring on the 20th February 2025 at WTG E13 to E19.	
036	EA 114 **For Nordex**	Spill kits must be made available on-site for the clean-up of spills.	Spill kits not provided by the contractor.	The contractor should provide spill kits at the warehouse.	**Closed-Out/ Corrected** Contractor has provided spill kit in the warehouse.	

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
						Figure 4445: Spill kit provided at Nordex warehouse.
037	EMPr 5.3.4.2 **For Nordex**	Should portable/chemical toilets be used then these shall be used and maintained in such a way that they do not cause water or other pollution: • No toilet facilities shall be located closer than 50 m to any water body • Toilets shall be adequately secured to the ground to prevent them from toppling due to wind or any other cause. • Adequate toilet paper, and hand sanitiser or soap shall be provided. • Toilets shall be serviced regularly (as per the service providers recommendations) and care shall be taken to ensure no spillage occurs when the toilets are cleaned or emptied and that the waste contents and grey water are properly stored before removal from site. • Certificates of service/disposal by appropriate service providers or at appropriately licensed facilities shall be retained for submission to the ECO. • Discharge of waste from toilets into the environment (e.g. burial	Chemical toilets provided at the site camp not secured to the ground, and trailer toilet was leaking.	The contractor should communicate with service provider with regards to anchoring toilets to the ground to prevent them from being blown by wind and report leaking toilet to be replaced.	**Closed-Out/ Corrected** Contractor has cleaned spillage from leaking toilet and anchored toilet to the ground.	 Figure 46: Toilet anchored to the ground at Nordex site camp.

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
		of ablution waste from toilets) is strictly prohibited. Toilets at the recommended Health and Safety standards must be provided. These should be emptied regularly, to prevent staff from using the surrounding vegetation.				
038	EMPr 5.3.12.5 **For Nordex** EMPr 7.1 Objective 4 **For Nordex**	All vehicles and plant shall be provided with a suitably sized service pan/drip tray to be used to effectively trap fuel leaks in the event of a breakdown. • Drip trays shall be provided for all plant including stationary plant (such as compressors) and for "parked" plant (such as scrapers, loaders or any vehicle). Drip trays or any form of oil absorbent material must be placed underneath vehicles/machinery and equipment when not in use. Appropriately contain any generator diesel storage tanks, machinery spills (e.g., accidental spills of hydrocarbons oils, diesel etc.) in such a way as to prevent	Although, drip trays were replaced under parked trucks and machinery, drip tray was not placed under generator at the buffer yard	The contractor should provide stopper for all drip tray used on site and replace broken ones.	**Closed-Out/ Corrected** Contractor has placed drip tray under generator.	 Figure 47: Drip tray placed under generator at the Buffer Yard.

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
	EMPr 7.1 Objective 11 **For Nordex**	them leaking and entering the environment. Appropriately contain any generator diesel storage tanks and machinery spills (e.g. accidental spills of hydrocarbons oils, diesel etc.) in such a way as to prevent them leaking and entering the environment.				
039	EA 36 **For Nordex** EMPr 7.1 Objective 2 **For Nordex** EMPr 7.1 Objective 11 **For Nordex**	An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal. Ensure waste storage facilities are maintained and emptied on a regular basis. All litter must be deposited in a clearly marked, closed, animal proof disposal bin in the construction area. Waste management must be a priority and all waste must be collected and stored adequately. Waste should be stored at a licensed facility. It is recommended that all waste be	Integrated waste management approach was not implemented on site as environmental impacts were not minimised at the buffer yard where waste skip for general waste was full not covered.	The contractor should improve waste management by covering skips to prevent waste from being blown by wind. Kindly note that this is a reoccurring finding, it should be rectified and not noted during the next audit or the ECO will issue an NCR.	**Open/ Uncorrected**	 Figure 48: Skip with general waste not covered at the buffer yard.

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
		removed from site on a weekly basis to prevent rodents and pests entering the site. Maximum domestic waste storage period will be up to 10 days. Specific areas must be designated on-site for the temporary management of various waste streams, i.e. general refuse, construction waste (wood and metal scrap), and contaminated waste as required. Location of such areas must seek to minimise the potential for impact on the surrounding environment, including prevention of contaminated runoff, seepage, and vermin control Any waste generated during construction must be stored into designated containers and removed from the site by the construction teams. Waste management must be a priority and all waste must be collected and stored adequately.				

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
043	EA 110 **For Power Construction** EA 112 **For Power Construction** EMPr 5.3.9.3 **For Power Construction**	No dumping or temporary storage of any materials may take place outside designated and demarcated laydown areas, and these must all be located within areas of low environmental sensitivity. Hazardous and flammable substances must be stored and used in compliance to the applicable regulations and safety instructions. Furthermore, no chemicals must be stored nor may any vehicle maintenance occur within 350m of the temporal zone of wetlands, a drainage line with or without an extensive floodplain or hillside wetlands. 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. • Hazardous Chemical Substance containers shall be situated on a smooth impermeable surface (concrete or 250 micrometre (µm) plastic (plastic must have a	Brixeal (bitumen brickwork waterproofing content) not placed in an impermeable surface (designated bund or storage container).	The contractor should place opened Brixeal buckets in HCS bund then store the closed buckets in a storage container.	**Closed-Out/ Corrected** Brixeal that was placed next to a container has been removed and stored inside a storage container.	 Figure 49: Brixeal that was placed next to a container has been removed.

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
	EMPr 5.3.9.3 **For Power Construction**	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. Bitumen drums/products, if stored on site, shall be stored with an appropriate base, bunding and sump.				

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
044	EMPr 5.3.15.7 **For Power Construction**	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.	Although bins are provided at the site camp, waste was observed on the ground near Labco offices and laydown area.	The contractor should ensure that waste is placed inside provided waste bins and do housekeeping regularly.	**Closed-Out/ Corrected** Precautions to avoid waste from spreading on, or from, site taken. Good housekeeping practiced.	 Figure 50: Good housekeeping practiced.
045	EMPr 5.3.13.5 **For Power Construction**	All vehicles and plant shall be provided with a suitably sized service pan/drip tray to be used to effectively trap fuel leaks in the event of a breakdown. • Drip trays shall be provided for all plant including stationary plant (such as compressors) and for "parked" plant (such as scrapers, loaders or any vehicle).	Drip tray placed under a generator at WTG E8 was broken.	The contractor should ensure that all drip trays are in a good state in order to effectively trap any accidental spills.	**Close-Out/ Corrected** The contractor replaced broken drip tray placed under generator.	 Figure 51: Broken drip tray placed under a generator was replaced at WTG E13.

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
046	EMPr 5.3.4.2 **For power Construction**	Should portable/chemical toilets be used then these shall be used and maintained in such a way that they do not cause water or other pollution: • No toilet facilities shall be located closer than 50 m to any water body. • Toilets shall be adequately secured to the ground to prevent them from toppling due to wind or any other cause. • Adequate toilet paper, and hand sanitiser or soap shall be provided. • Toilets shall be serviced regularly (as per the service providers recommendations) and care shall be taken to ensure no spillage occurs when the toilets are cleaned or emptied and that the waste contents and grey water are properly stored before removal from site. • Certificates of service/disposal by appropriate service providers or at appropriately licensed facilities shall be retained for submission to the ECO.	Chemical toilet at RN 1 was not secured to the ground and a spillage from servicing the toilet was observed.	The contractor should ensure that toilets are anchored to the ground and not serviced regularly at RN1.	**Open/ Uncorrected**	 Figure 52: Toilet not anchored to the ground at RN1.

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
		• Discharge of waste from toilets into the environment (e.g. burial of ablution waste from toilets) is strictly prohibited.				
047	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.	Waste bins provided at WTG N6 and N1 were not enough for the waste stored there. Waste was placed on a trailer and could easily be blown away by wind.	The contractor should provide enough waste bins that are sufficient capacity to waste that is produced on site.	**Open/ Uncorrected**	 Figure 53: Waste not stored appropriately at WTG N1.
048	EMPr 5.4.1.2 **For both Brand Besamandla and Nordex** EMPr 5.4.2.1	The Contractor shall agree the detailed access routes and requirements to the development sites, turbine locations and pylon positions with the relevant landowner, specifically adhering to gate management protocols of each landowner/ authorised representative.	Landowners have been complaining about contractors not adhering to gate management. Gates management	The contractor should always adhere to landowners' gate management protocols and ensure that all gates are closed when they leave site after a shift.	**Open/ Uncorrected**	N/A

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
	For both Brand Besamandla, and Nordex	Existing gates shall be used wherever possible when traversing private property to access the site. •A photographic record of the existing gates shall be kept, and the gates reinstated to their former status once no longer used for construction purposes. •Existing gates that were locked shall remain locked once access is gained, unless otherwise agreed with the landowner. •Under no circumstances are existing fences/gate locks to be cut without prior approval from the landowner/authorised representative.	has not been done properly, gates have been reported left open, and cows end up mixing.			
049	EMPr 5.8 **For Brand Besamandla**	All measures regarding waste management must be undertaken using an integrated waste management approach; Waste must be segregated into separate bins and clearly marked for each waste type for recycling and safe disposal;	Mixing of general waste with hazardous waste was observed at West substation.	The contractor should practice waste separation.	**Closed-Out/ Corrected** The contractor practice waste separation appropriately at West substation.	

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
						Figure 54: Waste separation done appropriately at West substation.
050	EMPr 5.17 **Brand Besamandla**	Hazardous substances were not stored suitably stored at Easte substation. Containers must be clearly marked to indicate contents, quantities and safety requirements; All storage areas must be bunded. The bunded area must be of sufficient capacity to contain a spill / leak from the stored containers; Bunded areas to be suitably lined with a SABS approved liner;	Hazardous substances were not suitably stored, some containers were not labelled, bunding was not sufficient to contain a spill or leak from the containers nor lined at East substation.	The contractor should store hazardous substances in an appropriate bunded area and label all containers.	**Closed-Out/ Corrected** Hazardous substances stored in a container on a bunded area.	 Figure 55: Hazardous substances stored in a bunded area at East substation.
051	EMPr 5.17 **Brand Besamandla**	Provision must be made for refuelling at the storage area by protecting the soil with an impermeable groundcover. Where dispensing equipment is used, a drip tray must be used to ensure small spills are contained;	Drip tray placed under a water pump was broken at West substation.	The contractor should replace broken drip tray to ensure that accidental spillages or leaks are contained.	**Closed-Out/ Corrected** Broken drip tray replaced with a new one at West substation.	

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
						Figure 56: Broken drip tray replaced under water pump at West substation.
052	EMPr 5.23 **For Brand Besamandla**	Designate smoking areas where the fire hazard could be regarded as insignificant;	Smoking areas designated at the site camp and all working areas. Fire extinguisher not provided though smoking area is near offices.	The contractor should provide fire extinguisher in all smoking areas for in case of accidental fire.	**Closed-Out/ Corrected** Fire extinguisher provided in a smoking area at East and West substation.	 Figure 57: Fire extinguisher provided in a smoking area at East and West substation.

5.8 INCIDENTS

Two (02) new incidents were reported during this reporting period. Small diesel spills were observed at the Main site camp storage area as well as WTG E13. OilCap was applied to the minor spillage areas to neutralise hydrocarbon in the gravel and prevent pollution from runoff. Inadequate diesel bowser was utilised by Steyns Drilling as obvious leaks from the bowser was evident and diesel spills on the ground at WTG W17. Environmental Manager instructed that the diesel bowser be removed from site and that adequate infrastructure is to be used. 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.

5.9 COMPLAINTS

Two (02) new complaints were reported to the ECO during this reporting period. A farmer reported that a cow got stuck in an open trench for MV reticulation. Another farmer reported that gate was left opened and his cows went to eat in another farmer's yard. All complaints have been recorded in the complaints register and are being monitored for closure by the EO and ECO. It should be noted that all complaints should be reported to the ECO as soon as they occur.

6 CONCLUSION

The contractors are 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**	**17**	**2**
Non-compliances	**4**	**56**	**9**
Non-compliance Reports	**0**	**0**	**0**
Incidents	**2**	**17**	**1**
Complaints	**2**	**16**	**2**

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.
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