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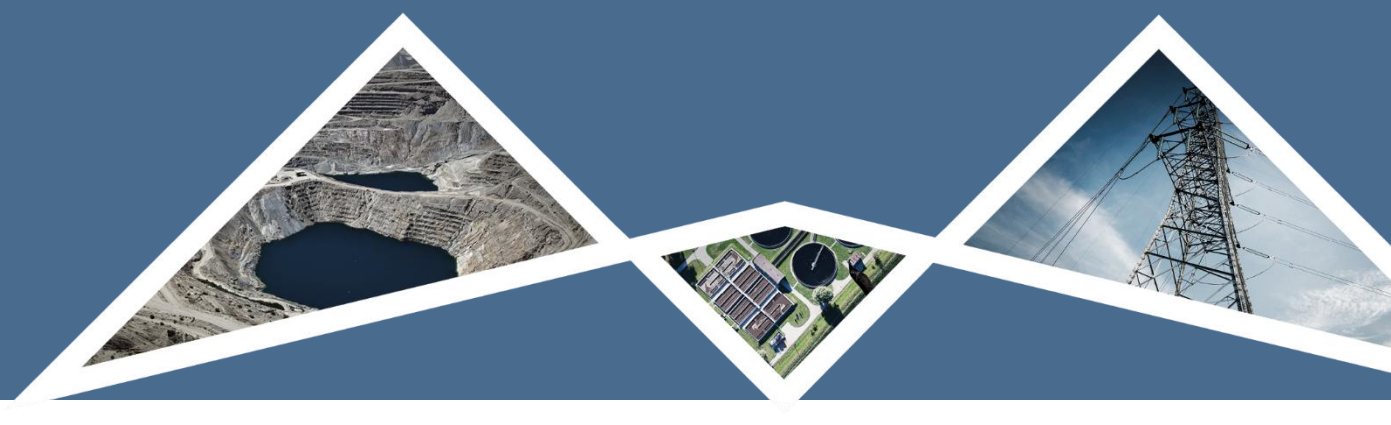
POST-CONSTRUCTION AUDIT REPORT

IMPOFU CLUSTER WIND ENERGY FACILITY NEAR OYSTER BAY IN THE EASTERN CAPE

DFFE REF:

Impofu East Wind Energy Facility: 14/12/16/3/3/2/1104

June 2026



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Report Distribution

Company / Organization	Name	Type
Department of Forestry, Fisheries and Environment	**Director of Compliance** **Email:** directorcompliance@dffe.gov.za	Electronic copy
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List of Abbreviations

Abbreviation	Item
DFFE	Department of Forestry, Fisheries and the Environment (also referred to as "The Department" in this report)
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
ECO	Environmental Control Officer
EGP	Enel Green Power
EIMS	Environmental Impact Management Services (Pty) Ltd
EMPr	Environmental Management Programme
FP	Fully Compliant
I&AP	Interested and Affected Party
N/A	Not Applicable
NC	Non-Compliance
NEMA	National Environmental Management Act, Act 107 of 1998
NEMWA	National Environmental Management: Waste Act
NV	Not Verified
PC	Patial Compliance/Partially Compliant



Definitions

Term	Definition
Auditor	A suitably qualified, trained and experienced professional who assesses if a Holders' / Licensee's activities, systems and/or processes comply with the requirements of the License and/or applicable Authorisations / Permits for a specific activity / project.
Auditee	The Holders' / Licensees' representative being audited to verify their compliance with specified conditions of the License and/or applicable Authorisations / Permits for a specific activity / project.
Environmental Authorisation	Environmental Authorisation is a legal permit required for activities that may have a significant impact on the environment, such as certain development projects, land use changes, or activities affecting coastal zones.
EA Holder / Licensee	The individual or legal entity that has received permission from a governing body to carry out specific activities.
Environmental Control Officer	An Environmental Control Officer is a professional who ensures that projects and activities comply with environmental laws, regulations, and permits.
Environmental Officer	An officer who ensures an organization or project complies with environmental laws and standards by monitoring activities, assessing risks, and developing mitigation strategies.
Environmental Management Programme	An Environmental Management Programme is a detailed approved / authorised document that outlines how a project will mitigate, control, and monitor its negative environmental impacts throughout its life cycle.
Full Compliance / Fully Compliant	Instances where a condition is entirely complied with as stipulated in the Authorisation / License.
Non-compliance	Instances where a condition is not entirely complied with as stipulated in the conditions being audited.
Not Applicable	Instances where a specific question, procedure, or reporting requirement does not apply to the specific entity, situation, or conditions being audited.
Not Verified	Instances where the Auditor is unable to obtain sufficient audit evidence to confirm the accuracy, existence, or valuation of a specific item, activity, systems and/or processes associated with a specific condition.
Patial Compliance / Partially Compliant	Instances where the Holder / Licensee meets some, but not all, of the requirements of a specific condition or requirement. It indicates that there are gaps in the implementation, or some aspects of a requirement have not been fully met and requires further action to achieve full compliance.

EXECUTIVE SUMMARY

Environmental Impact Management Services (Pty) Ltd. (EIMS) was appointed by Enel Green Power RSA (Pty) Ltd (EGP) on behalf of Red Cap Impofu East RF (Pty) Ltd (Impofu East), Red Cap Impofu West RF (Pty) Ltd (Impofu West) and Red Cap Impofu RF (Pty) Ltd (Impofu North) as an Independent Environmental Auditor (IEA) to undertake environmental audits as required by condition 29 of the Environmental Authorisations (EAs) for the three Impofu Wind Farms near Oyster Bay in the Eastern Cape Province, South Africa. These wind farms are referred to collectively as the Impofu Wind Farms (the Impofu Cluster). The consolidated site of the Impofu Cluster is bordered 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 Wind Farm having its own substation, foundations to support turbine towers, hardstand/maintenance areas at each turbine, permanent operations/maintenance buildings, temporary construction office and workshop areas. service and access roads were constructed in addition to upgrading existing roads, with the relevant stormwater infrastructure and gates constructed as required. A buffer yard for turbine assembly was also established within the Impofu North boundary.

The scope and objective of the audit was to assess compliance with the conditions of the Environmental Authorisation (EA), Environmental Management Programme (EMPr) and subsequent EA Amendments. This audit represents the independent post-construction audit findings for the three Impofu Wind Farms East Wind Farm and excludes the grid connection infrastructure and Buffer Yard which are subject of separate audits. Initial documentation was obtained and reviewed in preparation for the audit. Checklists and questionnaires were prepared based on the requirements of the EA's. Following the initial checklist preparation and documentation review, a site visit/audit was undertaken on the 26th of May 2026 to determine compliance with the requirements of the EA and EMPr.

It should be noted that the final audit report was submitted to DFFE on the 19th of June 2026. Subsequent feedback received from the Department requested that the report be revised to clearly address and distinguish the requirements and compliance status associated with the separate EA's. This report is therefore being revised accordingly to ensure that the findings and assessment are appropriately aligned with the respective EAs.

The EA assessment achieved a Straight Compliance Score of 94.16% and a Weighted Compliance Score of 97.08%. Whilst the Environmental Management Programme (EMPr), the compliance assessment yielded a Straight Compliance Score of 88.94% and a Weighted Compliance Score of 94.29%.

A summary of the key findings and recommendations resulting from the audit is provided below and the detailed findings and recommendations are provided in **Section 4**:

- Erosion and stormwater management remain a concern, with erosion observed along access roads, rehabilitated areas, side slopes, and drainage channels. Significant siltation was also noted in stormwater infrastructure.
- Rehabilitation and revegetation efforts are underway; however, vegetation establishment has been unsuccessful in some areas due to livestock trampling and ongoing land use activities.
- Livestock access to rehabilitation areas is affecting vegetation recovery, with several areas not adequately fenced or protected.
- Alien invasive plant species are present across the site and require ongoing management and removal.

- Heritage resource management was generally implemented; however, damaged fencing around heritage no-go areas was noted, and a heritage-related non-compliance occurred when excavation activities proceeded without adequate archaeological monitoring.
- Archaeological monitoring requirements were not consistently adhered to due to communication and scheduling shortcomings.
- Sediment and pollution control measures require improved maintenance to prevent impacts on watercourses.
- Demarcation fencing and barriers in some locations require repair and maintenance.
- Construction materials and equipment have largely been removed, although isolated remnants remain on site.
- Certain Environmental Authorisation conditions, particularly relating to erosion control, rehabilitation, alien plant management, health and safety planning, and EMPr implementation, were not fully complied with.

1 INTRODUCTION

Environmental Impact Management Services (Pty) Ltd. (EIMS) was appointed by Enel Green Power RSA (Pty) Ltd (EGP) on behalf of Red Cap Impofu East RF (Pty) Ltd (Impofu East), Red Cap Impofu West RF (Pty) Ltd (Impofu West) and Red Cap Impofu RF (Pty) Ltd (Impofu North). as an Independent Environmental Auditor (IEA) to undertake environmental audits as required by condition 29 of the Environmental Authorisations (EAs) for the three Impofu Wind Farms near Oyster Bay in the Eastern Cape Province, South Africa. These wind farms are referred to collectively as the Impofu Wind Farms (the Impofu Cluster). The consolidated site of the Impofu Cluster is bordered 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 (See **Figure 1**).

Ancillary infrastructure associated with the Impofu Cluster includes but is not limited to underground and above-ground cabling between project components, with each Impofu Wind Farm having its own substation, foundations to support turbine towers, hardstand/maintenance areas at each turbine, permanent operations/maintenance buildings, temporary construction office and workshop areas. Service and access roads were constructed in addition to upgrading existing roads, with the relevant stormwater infrastructure and gates constructed as required. A buffer yard for turbine assembly was also established within the Impofu North boundary. As indicated in the Executive Summary, the DFFE requested that the final audit report be revised to clearly address and distinguish the requirements and compliance status associated with the separate EA's. The scope of this audit report is therefore limited to the East Wind Farm.

1.1 PROJECT DESCRIPTION AND LOCATION

The project consists of three Wind Farms and associated infrastructure which are referred to as Impofu wind farms (Impofu Cluster), as outlined above energy generated by the Impofu Cluster will be wheeled from the site via a self-build Powfontein collector station, a 132 kV overhead powerline, approximately 120 km in length and a self-build Algoa switching station that would feed into the national electricity grid near the Nelson Mandela Bay Metropolitan Municipality (NMBM) Chatty substation, in Port Elizabeth. The Impofu Cluster has a combined electrical generation capacity of approximately 333 MW. Each of these Wind Farms underwent separate environmental authorisation processes. This report serves to fulfil the post-construction audit for the Impofu East WF.

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 198 MW Wind Farm comprised of up to 33 wind turbines. As above, this was revised and is now 112.1 MW through 19 turbines.

The below authorisations shown in **Table 1** were applicable to the post-construction audit for the aforementioned Impofu Wind Farm cluster:

Table 1: Authorizations applicable to the post-construction audit

Authorization	Date of Authorization	Reference Number	Amendments
Impofu East EA	25 September 2019	14/12/16/3/3/2/1104	AM1 - Amendment granted 16 November 2020 with respect to various changes to project description and locations of infrastructure AM2 – Amendment granted on 6 December 2022 with respect to layout changes AM3 – Granted in March 2025 for name changes and amendment of technical details AM4 – Granted in November 2025 for inclusion of 3 painted murals on site

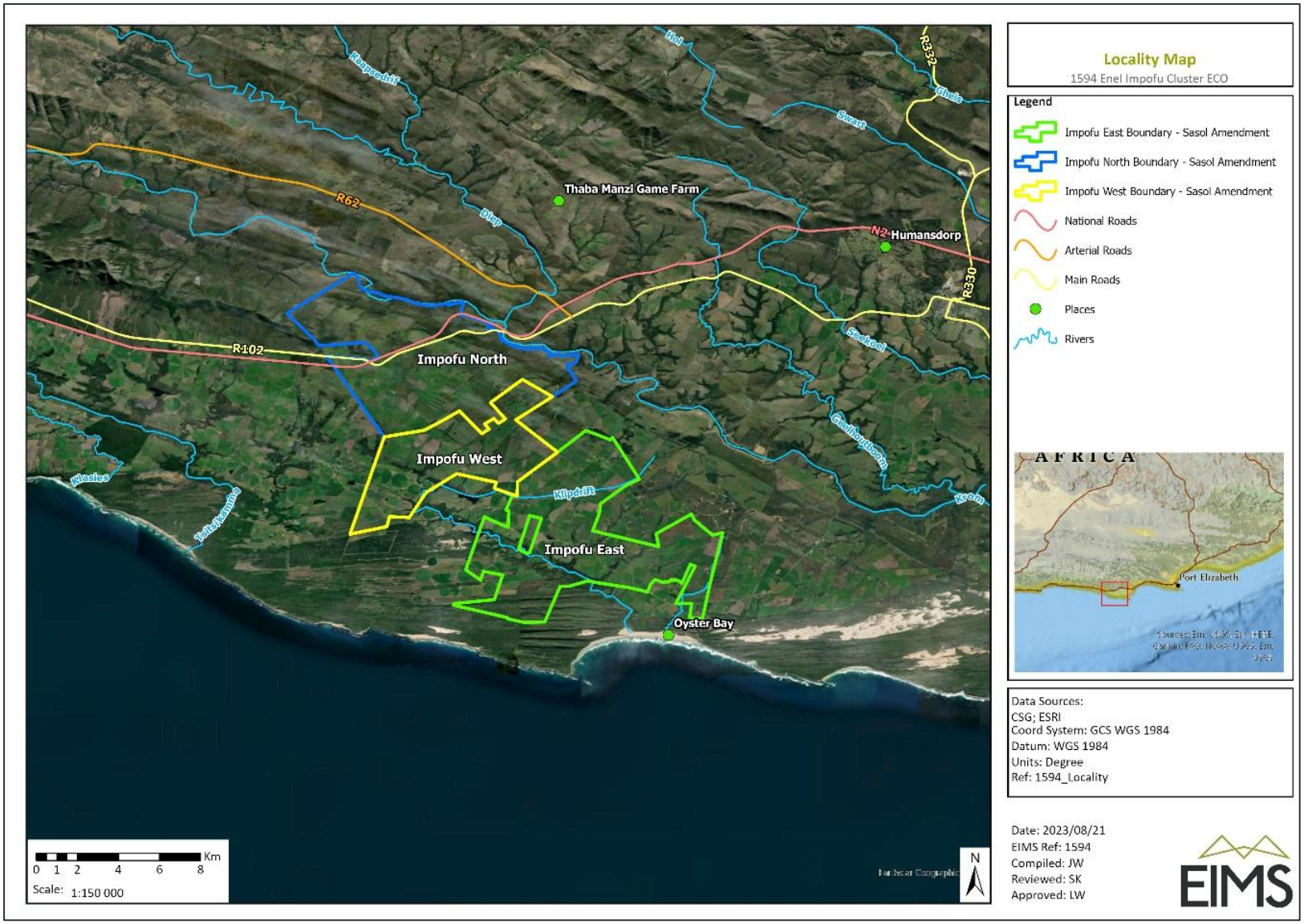


Figure 1: Impofu Wind Farm Cluster Boundaries

1.2 DETAILS OF THE HOLDER

Details of the holder are summarised in **Table 2** below.

Table 2: Details of the Holder.

Company Name	Red Cap Impofu East (Pty) Ltd
Responsible Person Name	Mr Manuele Battisti
Company Registration	2017/118197/07
Head Office Physical Address	102 Rivonia Road Sandton Johannesburg 2196
Head Office Telephone Number	(010) 344 0388
Head Office Contact Person	Mr Manuele Battisti
Operations Physical Address	Impofu Wind Cluster ERF 1/676 34°5'11.49"S 24°33'17.43"E
Operations Telephone number	083 268 1963
Operations Contact Person	Mr Sadao Chika

2 DETAILS OF THE AUDITOR

EIMS is a private and independent environmental management-consulting firm that was founded in 1993. EIMS is an independent specialised environmental consulting firm offering the full spectrum of environmental management services across all sectors within the African continent. EIMS has successfully completed many hundreds of assignments over the years with an excess of 30 years' experience in conducting compliance audits for both the government and private sector. Please refer to our company profile (available on request) for list of projects and experience in ECO work.

2.1 AUDITOR DETAILS

This audit was undertaken by Mr John von Mayer from EIMS. Mr John von Mayer is a senior consultant at EIMS and has been involved in numerous significant projects the past 18 years. He has experience in Project Management, small to large scale Environmental Impact Assessments, Environmental Auditing, Water Use Licensing, and Public Participation. He is a Registered Professional Natural Scientist (400336/11) with the South African Council Natural and Scientific Professions (SACNASP) as well as a registered EAPASA Environmental Practitioner (2019/1247).

2.2 DECLARATION OF INDEPENDENCE

*I, **John von Mayer**, declare that –*

- *I act as the independent environmental auditor;*
- *I will perform the work relating to the audit 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.*

3 AUDIT PROCESS

The audit process undertaken for the audit involved managing an audit program, conducting the audit, and providing the Auditee with a list of supporting information required for the audit. Key stages included planning the audit (reviewing EA and EMPr conditions, setting objectives, and creating the plan), conducting the audit (gathering evidence, and reporting findings), and following up on requested information to allow the Auditee an opportunity to provided necessary information to inform the audit.

3.1 AUDIT OBJECTIVE

The aim of the audit was to assess the post-construction compliance with the conditions stipulated in the EAs and the EMPrs for each Wind Farm. The audit objectives were to identify and present areas of compliance, non-compliances and recommendations of potential rectification measures. Most importantly, the compliance audit was undertaken as per the DFFE EA requirements for conducting post-construction compliance.

3.2 AUDIT SCOPE

The scope of the audit was limited to the post-construction and rehabilitation of the Impofu Wind Farms detailed in **Section 1.1**. The audit was limited to the three EAs (and subsequent amendments) and associated EMPrs for the Wind Farm Cluster. Whilst consideration was given to the relevant legislation, a full comprehensive legal compliance audit is beyond the scope of this audit. 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.

Although this audit is framed as a post-construction compliance audit, conditions assigned to earlier project phases were not automatically excluded from consideration. Where such conditions had continuing relevance, created enduring obligations, or were linked to observable legacy impacts or ongoing management requirements, they were considered as part of the audit. Conditions were only treated as not applicable where they were clearly historical in nature and no longer had a bearing on the current compliance status of the site.

3.3 AUDIT PRINCIPLES

The audit was conducted in accordance with the principles and processes outlined in Department of Environmental Affairs and Tourism - The Integrated Environmental Management Information Series: 14 Environmental Auditing and SANS 19011: 2019.

3.4 AUDIT CRITERIA

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

- Fully Compliant (FC): Indicating that the condition was fully complied with and provided with a compliance score of 4.
- Partially Compliant (PC): Indicating that the condition was partially but not entirely complied with and provided with a compliance score of 2.
- Non-Compliant (NC): Indicating that the condition has not been entirely 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.
- Not Verified (NV): Indicating that the Auditor was unable to obtain sufficient audit evidence to confirm the accuracy, existence, or valuation of a specific item, activity, systems and/or processes associated with a specific condition. It is important to note that these conditions remain binding on the applicant and must be implemented and complied with as and when relevant to ensure compliance.

3.5 AUDIT METHODOLOGY

Initial documentation was obtained and reviewed in preparation for the audit. Checklists were prepared, based on the requirements of the EAs and EMPrs. After the initial checklist preparation and documentation review, a site visit was undertaken on the 25 – 26 May 2026. Site inspections were targeted to representative areas and infrastructure components considered relevant to the audit scope, risk profile, and accessibility during the audit period. Compliance with the requirements of the EA and EMPr were evaluated using pre-determined scoring criteria as described in **Section 3.4**. The results of the evaluation are summarised in **Section 4.1** and the findings are discussed in **Section 4.2**. Each condition in the EA and EMPr was weighted equally to determine a compliance score.

Various documentation and records were required during the audit to confirm compliance with the EA and EMPr conditions. Where possible, documentation and records were made available electronically for review prior the site visit. A request for additional information/documentation was prepared and submitted to the Auditee following the site inspection. The outcome and/or information obtained from the document request informed this audit. The findings of this audit are based on site interviews and walkabout with the Auditees as well as documentation reviewed. No, physical testing or chemical analysis was undertaken during the audit, and information provided by Auditees was verified by inspection and review only. The following Auditees formed part of the audit, the EA Holder's Environmental Officer and Construction/Site Manager and the Contractor's Environmental Officer.

4 RESULTS OF THE AUDIT

The results of the audit are presented in this section of the report. The results include a summary of compliance with the requirements, the results of the overall compliance evaluation and summary of findings.

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.

4.1 SUMMARY OF COMPLIANCE

A summary of compliance for the three wind farms is provided below:

A total of one-hundred and sixty-seven (167) license conditions were evaluated for the EA of which one-hundred and forty-one (141) were found to be applicable and twenty-six (26) were found not applicable to the current phase of the audit. While a total of three-hundred and twenty-four (324) conditions were evaluated for the Environmental Management Programme (EMPr), of which two-hundred and fifteen (215) were found to be applicable and one-hundred and nine (109) were not applicable to the current phase of the audit.

The EA assessment achieved a **Straight Compliance Score of 95.04%** and a **Weighted Compliance Score of 97.52%**. Whilst the Environmental Management Programme (EMPr), the compliance assessment yielded a **Straight Compliance Score of 89.77%** and a **Weighted Compliance Score of 94.65%.**

Compliance was evaluated using the pre-determined scoring criteria as described in **Section 3.4** and the results of the audit are described in **Section 4** of this report. Each condition in the EA and EMPrs was weighted equally to determine a compliance score. A summary of the key findings resulting from the audit are provided in **Section 5** below.

The level of compliance for each commitment was calculated according to the methodology described in **Section 3.4**. A summary of the conditions rated as Compliant and Non-Compliant are presented in Figure 2 and Figure 3 below.

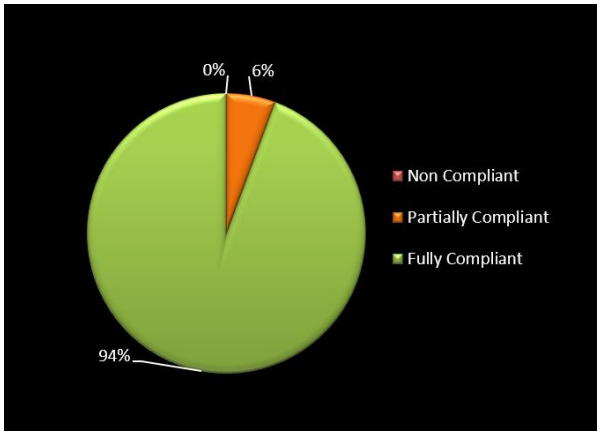


Figure 2: Summary graph illustrating compliance scores against the requirements of the EA.

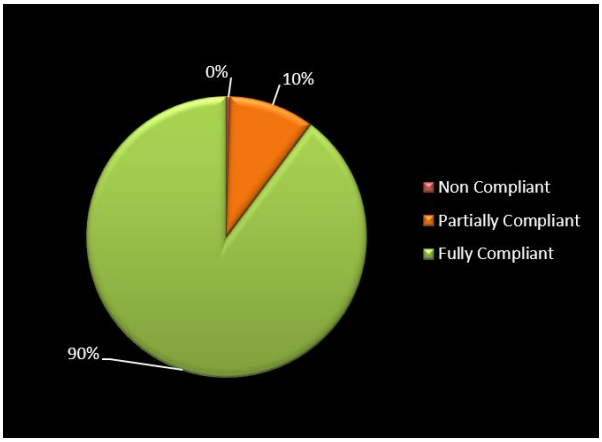


Figure 3: Summary graph illustrating compliance scores against the requirements of the EMPr

4.2 DETAILED COMPLIANCE EVALUATION

Table 3 and **Table 4** below shows the detailed compliance evaluation and findings for the EA and EMPr respectively. As indicated in **Section 3.4**, and List of Abbreviations, the following are applicable to this Section; Full Compliant (FC), Partial Compliance (PC), Non-Compliance (NC), Not Applicable (N/A) and Not Verified (NV). **Non-Compliances** (compliance rating of 0) are indicated in red and **Partial Compliances** (compliance rating of 2) are indicated in light gold for the Auditees to easily identify conditions that need to be rectified. **Full compliances** are provided a rating of 4.



Table 3: Audit Findings for the East Environmental Authorisation

Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
Conditions of Environmental Authorization			
Scope of authorization			
The construction of the Impofu East Wind Energy Facility and its associated infrastructure with a maximum output capacity of ~~198MW~~ 189MW as described above is hereby approved.	N/A	N/A	Information item.
Authorisation of the activity is subject to the conditions contained in this environmental authorisation, which form part of the environmental authorisation and are binding on the holder of the authorisation.	N/A	N/A	Information item.
The holder of the authorisation is responsible for ensuring compliance with the conditions contained in this environmental authorisation. This includes any person acting on the holder's behalf, including but not limited to, an agent, servant, contractor, sub-contractor, employee, consultant or person rendering a service to the holder of the authorisation	Y	4	All personnel working on site has been issued a copy of the EA/EMPr or sensitised about the importance of compliance to the conditions of these documents.
The activities authorised must only be carried out at the property as described above.	Y	4	All authorised activities are currently being carried out at the property as described in the EA.
Any changes to, or deviations from, the project description set out in this environmental authorisation must be approved, in writing, by the Department before such changes or deviations may be effected. In assessing whether to grant such approval or not the Department may request such information as it deems necessary to evaluate the significance and impacts of such changes or deviations and it may be necessary for the holder of the authorisation to apply for further environmental authorisation in terms of the regulations.	Y	4	All amendments were undertaken in the manner described/required.
The holder of an environmental authorisation must apply for an amendment of the environmental authorisation with the competent authority for any alienation, transfer or change of ownership rights in the property on which the activity is to take place.	N/A	N/A	It was reported that no alienation, transfer or change of ownership rights in the property on which the activity is to take place have taken place. The contact persons details were updated and amendment was approved in this regard.
This activity must commence within a period of five (05) years from the date of issue of this environmental authorisation expiry of the EA issued on 25 September 2019 (i.e. the EA lapses on 25 September 2029) . If commencement of the activity does not occur within that period, the authorisation lapses and a new application for environmental authorisation must be made in order for the activity to be undertaken.	Y	4	The activity commenced in 31st October 2023.
Construction must be completed within five (05) years of the commencement of the activity on site.	Y	4	Construction commenced in October 2023 and was completed in May 2026.
Commencement with one activity listed in terms of this environmental authorisation constitutes commencement of all authorised activities.	N/A	N/A	Information item. Noted by the holder of the EA and contractor.
Notification of authorisation and right to appeal			



The holder of the authorisation must notify every registered interested and affected party, in writing and within 14 (fourteen) calendar days of the date of this Environmental Authorisation, of the decision to authorise the activity.	Y	4	Notification were sent to I&APs on the 1st of October 2019. AM3 was granted on 24/02/2025 and Notification to I&AP's was done on 10/03/2025.
The notification referred to must -			
specify the date on which the authorisation was issued;	Y	4	Specified in the notification letter.
inform the interested and affected party of the appeal procedure provided for in the National Appeal Regulations, 2014;	Y	4	Specified in the notification letter.
advise the interested and affected party that a copy of the authorisation will be furnished on request; and	Y	4	Specified in the notification letter.
give the reasons of the Competent Authority for the decision.	Y	4	The reasons for decision were attached to the notification letter.
Commencement of the activity			
The authorised activity must not commence until the period for the submission of appeals has lapsed as per the National Appeal Regulations, 2014 and no appeal has been lodged against the decision. In terms of Section 43(7), an appeal under Section 43 of the National Environmental Management Act, Act No, 107 of 1998, as amended will suspend the Environmental Authorisation or any provision or condition attached thereto. In the instance where an appeal is lodged you must not commence with the activity until such time that the appeal has been finalised.	Y	4	Construction commenced following the lapse of appeals submission period. Confirmation of appeals/no appeals was sought from the Competent Authority.
Management of the activity			
A copy of the final site layout map must be made available for comments by registered Interested and Affected Parties and the holder of this environmental authorisation must consider such comments. Once amended, the final development layout map must be submitted to the Department for written approval prior to commencement of the activity. All available biodiversity information must be used in the finalisation of the layout map. Existing infrastructure must be used as far as possible e.g. roads. The layout map must indicate the following:	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023.
13.1. Cable routes (where they are not along internal roads);	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023.
13.2. Position of wind turbines and associated infrastructure;	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023.
13.3. Internal roads indicating width;	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023.
13.4. Wetlands, drainage lines, rivers, stream and water crossing of roads and cables;	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023.
13.5. All sensitive features e.g. Critical Biodiversity Areas, Ecological Support Areas, heritage sites, wetlands, pans and drainage channels that will be affected by the facility and associated infrastructure;	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023.
13.6. Substation(s) inverters and/or transformer(s) sites including their entire footprint;	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023.
13.7. Connection routes (including pylon positions) to the distribution/transmission network;	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023.
13.8. All existing infrastructure on the site, such as roads;	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023.
13.9. Soil heaps (temporary for topsoil and subsoil and permanently for excess material);	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023.
13.10. Buildings, including accommodation; and,	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023.
13.11. All "no-go" and buffer areas.	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023.



14. Furthermore, a shapefile of the approved development layout/footprint must be submitted to this Department within two months from the date of this decision. The shapefile must be created using the Hartebeesthoek 94 Datum and the data must be in Decimal Degree Format using the WGS 84 Spheroid. The shapefile must include at a minimum the following extensions i.e. .shp; .shx; .dbf; .prj; and, .xml(Metadata file). If specific symbology was assigned to the file, then the .avl and/or the .lyr file must also be included. Data must be mapped at a scale of 1:10 000 (please specify if an alternative scale was used). The metadata must include a description of the base data used for digitizing. The shapefile must be submitted in a zip file using the EIA application reference number as the title.The shape file must be submitted to:Postal Address:Department of Environmental AffairsPrivate Bag X447Pretoria0001Physical address:Department of Environmental AffairsEnvironment House473 Steve Biko RoadArcadiaPretoriaFor Attention: Mr Muhammad EssopIntegrated Environmental AuthorisationsStrategic Infrastructure DevelopmentsTelephone Number: (012) 399 9406Email Address: MEssop@environment.gov.za	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023.
The Environmental Management Programme (EMPr) submitted as part of the ElAr is not approved and must be amended to include measures as dictated by the final site lay-out map and micro-siting, and the provisions of this environmental authorisation. The EMPr must be made available for comments by registered Interested and Affected Parties and the holder of this environmental authorisation must consider such comments. Once amended, the final EMPr must be submitted to the Department for written approval prior to commencement of the activity. Once approved the EMPr must be implemented and adhered to.	Y	4	Final revision of the EMPr was issued on the 17th of May 2023. This complied with the EA requirements as confirmed by the DFFE letter dated 13/06/2023.
16. The EMPr amendment must include the following:	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023.
16.1. The requirements and conditions of this authorisation.	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023.
16.2. All recommendations and mitigation measures recorded in the ElAr.	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023.
16.3. All mitigation measures as listed in the specialist reports must be included in the EMPr and implemented.	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023.
16.4. The final site layout map.	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023.
16.5. An alien invasive management plan must be implemented during construction and operation of the facility. The plan must include mitigation measures to reduce the invasion of alien species and ensure that the continuous monitoring and removal of alien species is undertaken.	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023. An alien invasive plan was included in the approved EMPr
16.6. A plant rescue and protection plan which allows for the maximum transplant of conservation important species from areas to be transformed must be implemented. This plan must be compiled by a vegetation specialist familiar with the site in consultation with the ECO and be implemented prior to commencement of the construction phase.	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023. Included in EMPr App 3.5.2. Impofu East Plant Rescue and Protection
16.7. A re-vegetation and habitat rehabilitation plan must be implemented during the construction and operation of the facility. Restoration must be undertaken as soon as possible after completion of construction activities to reduce the amount of habitat converted at any one time and to speed up the recovery to natural habitats.	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023. Included in EMPr App 3.5.3. Impofu East Aquatic Rehab and Revegetation Plan
16.8. A traffic management plan for the site access roads must be implemented to ensure that no hazards would results from the increased truck traffic and that traffic flow would not be adversely impacted. This plan must include measures to minimize impacts on local commuters e.g. limiting	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023. Included in EMPr App 3.5.5. Impofu East Traffic Management Plan



construction vehicles traveling on public roadways during the morning and late afternoon commute time and avoid using roads through densely populated built-up areas so as not to disturb existing retail and commercial operations.			
16.9. A construction and operational avifauna and bat monitoring plan.	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023. Included in EMPr App 3.5.6. Impofu East Avifauna Monitoring Plan and App 3.5.7. Impofu Bat Mitigation Management Plan
16.10. A storm water management plan must be implemented during the construction and operation of the facility. The plan must ensure compliance with applicable regulations and prevent off-site migration of contaminated storm water or increased soil erosion. The plan must include the construction of appropriate design measures that allow surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows. Drainage measures must promote the dissipation of storm water run-off.	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023. Included in EMPr App 3.5.8 Stormwater Management Plan.
16.11. An erosion management plan for monitoring and rehabilitating erosion events associated with the facility. Appropriate erosion mitigation must form part of this plan to prevent and reduce the risk of any potential erosion.	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023. Included in EMPr App 3.5.9. Impofu East Erosion Management Plan
16.12. An effective monitoring system to detect any leakage or spillage of all hazardous substances during their transportation, handling, use and storage. This must include precautionary measures to limit the possibility of oil and other toxic liquids from entering the soil or storm water systems.	Y	4	The EMPr covers the management of spills and monitoring. It is further covered by the Emergency preparedness plan.
16.13. A fire management plan must be implemented during the construction and operational phases.	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023. Included in EMPr App 3.5.10. Impofu East Fire Management Plan
16.14. Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments: and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants.	Y	4	Included in the EMPr and emergency preparedness plan.
16.15. An environmental sensitivity map indicating environmental sensitive areas and features identified during the EIA process.	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023.
16.16. A map combining the final layout map superimposed (overlain) on the environmental sensitivity map. This map must reflect the proposed location of the turbine as stated in the ElAr and this authorisation.	Y	4	Complied as confirmed by the DFFE letter dated 13/06/2023.
17. The final amended EMPr (once approved) must be implemented and strictly enforced during all phases of the project. [t shall be seen as a dynamic document and shall be included in all contract documentation for all phases of the development when approved.	N	2	The EMPr is enforced however certain non-compliances were noted with respect to several EMPR conditions. These were captured in the monthly ECO reports and closed out as construction progressed.
18. Changes to the approved EMPr must be submitted in accordance to the EIA Regulations applicable at the time.	Y	4	It should be noted however that the amended EMPr was approved with the inclusion of the required plans and figures.
19. The Department reserves the right to amend the approved EMPr should any impacts that were not anticipated or covered in the ElAr be discovered.	N/A	N/A	Information item.
Frequency and process of updating the EMPr			
20. The EMPr must be updated where the findings of the environmental audit reports, contemplated in Condition 28 below, indicate insufficient mitigation of environmental impacts associated with the	N/A	N/A	The current EMPr is considered sufficient to manage mitigation of environmental impacts associated with the activity.



undertaking of the activity, or insufficient levels of compliance with the environmental authorisation or EMPr.			
21. The updated EMPr must contain recommendations to rectify the shortcomings identified in the environmental audit report	N/A	N/A	The current EMPr is considered sufficient to manage mitigation of environmental impacts associated with the activity.
22. The updated EMPr must be submitted to the Department for approval together with the environmental audit report, as per Regulation 34 of GN R. 982 of the EIA Regulations of 2014, as amended. The updated EMPr must have been subjected to a public participation process, which process has been agreed to by the Department, prior to submission of the updated EMPr to the Department for approval.	N/A	N/A	The current EMPr is considered sufficient to manage mitigation of environmental impacts associated with the activity.
23. In assessing whether to grant approval of an EMPr which has been updated as a result of an audit, the Department will consider the processes prescribed in Regulation 35 of GN R.982 of the EiA Regulations of 2014, as amended. Prior to approving an amended EMPr, the Department may request such amendments to the EMPr as it deems appropriate to ensure that the EMPr sufficiently provides for avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity.	N/A	N/A	The current EMPr is considered sufficient to manage mitigation of environmental impacts associated with the activity.
24. The holder of the authorisation may apply for an amendment of an EMPr, if such amendment is required before an audit is required. The amendment process is prescribed in Regulation 37 of GN R982 of the EIA Regulations of 204, as amended. The holder of the authorisation must request comments on the proposed amendments to the impact management outcomes of the EMPr or amendments to the closure objectives of the closure plan from potentially interested and affected parties, including the competent authority, by using any of the methods provided for in the Act for a period of at least 30 days.	N/A	N/A	The current EMPr is considered sufficient to manage mitigation of environmental impacts associated with the activity.
Monitoring			
25. The holder of the authorisation must appoint an experienced independent Environmental Control Officer (ECO) for the construction phase of the development that will have the responsibility to ensure that the mitigation/rehabilitation measures and recommendations referred to in this environmental authorisation are implemented and to ensure compliance with the provisions of the approved EMPr.	Y	4	An ECO was appointed for construction phase of the project. The ECO was appointed in June 2023 and the DFFE was notified by email in a letter where construction start dates were also stipulated.
25.1. The ECO must be appointed before commencement of any authorised activities.	Y	4	An ECO was appointed for construction phase of the project. The ECO was appointed in June 2023 and the DFFE was notified by email in a letter where construction start dates were also stipulated.
25.2. Once appointed, the name and contact details of the ECO must be submitted to the Director: Compliance Monitoring of the Department.	Y	4	An ECO was appointed for construction phase of the project. The ECO was appointed in June 2023 and the DFFE was notified by email in a letter where construction start dates were also stipulated.
25.3. The ECO must keep record of all activities on site, problems identified, transgressions noted and a task schedule of tasks undertaken by the ECO.	Y	4	All issues and site problems were kept on record by the ECO.
25.4. The ECO must remain employed until all rehabilitation measures, as required for implementation due to construction damage, are completed and the site is ready for operation.	Y	4	The ECO remains employed during the post construction/rehab phase of the project.



Recording and reporting to the Department			
26. All documentation e.g. audit/monitoring/compliance reports and notifications, required to be submitted to the Department in terms of this environmental authorisation, must be submitted to the Director: Compliance Monitoring of the Department.	Y	4	All required monitoring and compliance reports are submitted to the department as required.
27. The holder of the environmental authorisation must, for the period during which the environmental authorisation and EMPr remain valid, ensure that project compliance with the conditions of the environmental authorisation and the EMPr are audited, and that the audit reports are submitted to the Director: Compliance Monitoring of the Department.	Y	4	All required monitoring and compliance reports are submitted to the department as required.
28. The frequency of auditing and of submission of the environmental audit reports must be as per the frequency indicated in the EMPr, taking into account the processes for such auditing as prescribed in Regulation 34 of GN R. 982 of the EIA Regulations of 2014, as amended.	Y	4	The frequency of audits is conducted as stipulated in the EA / EMPr.
29. The holder of the authorisation must, in addition, submit environmental audit reports to the Department within 30 days of completion of the construction phase (i.e. within 30 days of site handover) and a final environmental audit report within 30 days of completion of rehabilitation activities.	N/A	N/A	Rehabilitation of the site is still ongoing.
30. The environmental audit reports must be compiled in accordance with Appendix 7 of the EIA Regulations, 2014, as amended and must indicate the date of the audit, the name of the auditor and the outcome of the audit in terms of compliance with the environmental authorisation conditions as well as the requirements of the approved EMPr.	Y	4	All required monitoring and compliance reports are submitted to the department as required.
31. Records relating to monitoring and auditing must be kept on site and made available for inspection to any relevant and competent authority in respect of this development.	Y	4	The required records are kept on site
Notification to authorities			
32. A written notification of commencement must be given to the Department no later than fourteen (14) days prior to the commencement of the activity. Commencement for the purposes of this condition includes site preparation. The notice must include a date on which it is anticipated that the activity will commence, as well as a reference number.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Operation of the activity			
33. A written notification of operation must be given to the Department no later than fourteen (14) days prior to the commencement of the activity operational phase.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Site closure and decommissioning			
34. Should the activity ever cease or become redundant, the holder of the authorisation must undertake the required actions as prescribed by legislation at the time and comply with all relevant legal requirements administered by any relevant and competent authority at that time.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. The site has not been decommissioned.
Specific conditions			
Turbines position			
35. Up to 33 27 23 19 wind turbines are approved.	Y	4	The layout of the facility is in line with the requirements of the EA. 19 Wind turbines have been constructed.
36. All wind turbines must avoid all areas designated as "no-go" areas as well as their buffers.	Y	4	All no go areas have been avoided by the current layout.



37. The final placement of turbines must follow a micro siting procedure involving a walk-through and identification of any sensitive areas by ecological, avifaunal, bat, surface water and heritage specialists.	Y	4	Final turbine placement was completed in line with the required micro-siting procedure
38. Exclusion of sensitive ecological, avifaunal, bat, surface water and heritage areas from construction activities must inform micro siting of all development activities.	Y	4	All no go/sensitive areas have been avoided by the current layout.
Avifauna and bats			
39. Monitoring of breeding status of Martial Eagles must be conducted in all breeding seasons prior to and during construction.	Y	4	Monitoring of marital eagles was completed in all breeding seasons prior to and during construction as required.
40. During the operation phase, if Blue Crane turbine or power line collision fatalities occur as a result of livestock feeding, either farmers must be restricted from feeding between 200m-300m from turbines and power lines or feeding points must be covered or obstructed in some way that prevents the birds from easily feeding from them.	N/A	N/A	At the time of the audit, the facility had not yet entered the operational phase. *Powerline bird fatalities had not occurred to date.*
41. A 6km no-go buffer around the Martial Eagle nest must be respected.	Y	4	There has been no encroachment into the 6km buffer of the martial eagle nest.
42. Prior to construction, an avifaunal specialist must conduct a site walkthrough, covering the final road and powerline routes as well as the final turbine positions, to identify any nests/breeding/roosting activity of priority species, as well as any additional sensitive habitats. The results thereto must inform the final construction schedule in close proximity to that specific area, including reducing construction time, scheduling activities around avian breeding and/or movement schedules, and lowering levels of associated noise.	Y	4	A Final layout avifaunal walk through was undertaken in November 2022 by an avifaunal specialist to fulfil these requirements.
43. During operational monitoring, if above threshold mortalities are recorded, then the following preliminary mitigation schedule must be consulted to advise on the mitigation to be applied at identified turbines at selected high risk bat activity times and weather conditions:	N/A	N/A	The facility has not yet entered the operational phase.
44. Curtailment must be applied initially to alt turbines at the start of operation at Level 3 of the mitigation scale (Ninety-degree feathering of blades below manufacturer's cut-in speed so it is exactly parallel to the wind direction as to minimise free-wheeling blade rotation as much as possible without locking the blades).	N/A	N/A	The facility has not yet entered the operational phase.
45. A construction and operational avifauna and bat monitoring plan must be developed and implemented according to the latest Birdlife South Africa/Endangered Wildlife Trust: Best practice guidelines for avian monitoring and impact mitigation at proposed wind energy development sites in Southern Africa and the latest South African Bat Assessment Advisory Panel's (SABAAP) guidelines.	Y	4	Construction and post-construction bird and bat monitoring programmes are in place in line with the guidelines and are being implemented. Operational monitoring will commence once the facility enters the operational phase.
46. As an absolute minimum, avifauna and bat monitoring, to survey impacts resulting from the infrastructure on the bird communities with focus on assessing the displacement and disturbance effects of the development on the bird communities, as well as bird collisions and continue to gather information on the bird communities present in the area and monitor the effectiveness of the mitigation measures, must occur during the construction period and continue for at least three years during the operation of the facility. The results of this monitoring must be made available to the Department of Environmental Affairs (DEA), Birdlife South Africa (BLSA) and the South African Bat Assessment Advisory Panel (SABAAP) and must further advise the EMPr where necessary.	Y	4	Avifaunal monitoring was undertaken in line with the Avifauna management plan and bat mitigation management plan during construction. The EA holder must continue with the required monitoring, in line with the requirement of the condition.



47. The results of the pre-construction bird and bat monitoring assessments including all recommendations proposed by the reports dated March 2019, must inform the final layout and the construction schedule of the facility.	Y	4	The bird assessments were considered
48. The facility must be designed in a manner that prevents infrastructure components from being used as perching or roosting substrates by birds and bats, as such is prohibited discourages the roosting of bats in the buildings.	Y	4	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
49. The holder of this environmental authorisation must restrict the construction activities to the footprint area. No access to the remainder of the property is allowed.	Y	4	Construction activities were limited to the approved footprint/layout.
50. Anti-collision devices such as bird flappers must be installed where powerlines cross avifaunal corridors (e.g. grasslands, rivers, wetlands, and dams). The input of an avifaunal specialist must be obtained for the fitting of the anti-collision devices onto specific sections of the line once the exact positions of the towers have been surveyed and pegged. Additional areas of high sensitivity along the preferred alignment must also be identified by the avifaunal specialist for the fitment of anti-collision devices. These devices must be according to Eskom's Transmission and EWTs Guidelines.	Y	4	Bird diverters and bird guards have been on required sections of power lines as per the Avifaunal specialist recommendations.
51. A pre-construction walk through of the approved powerline alignment and turbine positions by a bat specialist, avifaunal specialist and ecologist, must be conducted to ensure that the micro-siting of the turbines, pylons and powerline alignments have the least possible impact, there are no nest sites of priority species on or close to the construction corridor and all protected plant species impacted are identified.	Y	4	A pre-construction walkdown was undertaken as required and the final layout was adjusted to limit impacts in line with specialist findings and recommendations.
Vegetation, wetlands and water resources			
52. No development/infrastructure are allowed within the No-Go areas.	Y	4	No development has occurred in identified no-go areas.
53. All internal powerline/cables must follow internal access roads.			This condition is removed in AM1.
54. The 'no-go' areas of the development property must be clearly demarcated and must be excluded from the final layout plan.	Y	4	The final layout plan demarcates the no-go areas.
55. An aquatic specialist must conduct an in-depth site walkover prior to the construction phase commencing, after the proposed construction footprint has been confirmed and demarcated. This is to assess the footprint for any freshwater habitats, allowing for slight alterations in the footprint, to prevent any impacts on the freshwater habitats due to the actions conducted during the construction phase.	Y	4	Aquatic specialist walk through done, and Final Site Layout Plan developed to avoid watercourses, wetlands and their buffer area
56. Relevant permits must be obtained from relevant authorities for any removal or destruction of Threatened or Protected Species (TOPS).	Y	4	An ordinance flora permit was issued to the project by the EC DEDEAT
57. Before the clearing of the site, the appropriate permits must be obtained from the Department of Agriculture, Forestry and Fisheries (DAFF) for the removal of plants listed in the National Forest Act and from the relevant provincial departments for the destruction of species protected in terms of the specific provincial legislation. Copies of the permits must be kept by the ECO.	Y	4	All appropriate permits were obtained and provided to the ECO.
58. Construction activities must be restricted to demarcated areas to restrict the impact on sensitive environmental features.	Y	4	Construction activities appear to have been restricted to the demarcated areas only.

59. All areas of disturbed soil must be reclaimed using only indigenous grass and shrubs. Reclamation activities shall be undertaken according to the rehabilitation plan to be included in the final EMPr. 60. Topsoil from all excavations and construction activities must be salvaged and reapplied during reclamation.	Y	4	Indigenous grasses are used for rehabilitation purposes except where it was already covered with alien vegetation, in line with the rehabilitation plan
60. Topsoil from all excavations and construction activities must be salvaged and reapplied during reclamation.	Y	4	Topsoil was salvaged from construction activities and reapplied as required
61. No exotic plants must be used for rehabilitation purposes; only indigenous plants of the area must be utilised.	Y	4	No exotic plants were used for rehabilitation purposes, only indigenous grasses, except where aliens were already present. This is in line with the requirements of the rehabilitation plan provided.
62. No activities will be allowed to encroach into a water resource without a Water Use License being in place from the Department of Water and Sanitation.	Y	4	The relevant permits and approvals from DWS are in place for these areas
63. Cleared alien vegetation must not be dumped on adjacent intact vegetation during clearing but must be temporarily stored in a demarcated area.	Y	4	No clearance of alien vegetation was taking place at the time of the audit. However, the auditee stated that alien vegetation was either killed using herbicides, or cut, plucked out and moved to a designated area such as the waste storage areas per the alien vegetation management plans approved for the project.
64. Removal of alien invasive species or other vegetation and follow-up procedures must be in accordance with the Conservation of Agricultural Resources Act, 1983 (Act 43 of 1983).	N	2	Alien removal is generally in line with the CARA and the requirements of the rehab plan, however issues are still noted with respect to proliferation of aliens on the site. *Acacia saligna (*or Port Jackson Willow*)*, for instance was observed in stormwater drains and on the sides of the internal roads.
65. Contractors and construction workers must be clearly informed of the no-go areas.	Y	4	No go areas are clearly demarcated. Workers are informed of the requirement to avoid these areas.
66. Where roads pass right next to major water bodies, provisions must be made for fauna to pass under the roads by using culverts or similar structures.	Y	4	Culverts were noted in areas where roads pass by or cross key water bodies.
67. Bridge design must be such that it minimises impact to riparian areas with minimal alterations to water flow and must allow the movement of fauna and flora.	N/A	N/A	No bridges were constructed. However, culverts were noted in areas where roads pass by or cross key water bodies. These were designed to allow movement of flora and fauna with minimal alterations to water flows.
68. The final development area must be surveyed for species suitable for search and rescue, which must be trans-located prior to the commencement of construction.	Y	4	Search and rescue was undertaken by 'EnviroSci (Pty) Ltd' prior to the commencement of construction.
69. Electric fencing must not have any strands within 30cm of the ground, to allow smaller mammals, reptiles and tortoises to pass through, but still remain effective as a security barrier.	N/A	N/A	No electric fencing is in place except at the on-site substation areas.
70. Disturbed areas must be rehabilitated as soon as possible after construction with locally indigenous plants to enhance the conservation of existing natural vegetation on site.	Y	4	Disturbed areas were rehabilitated in a timely manner using indigenous grasses.
71. Wetlands, rivers and river riparian areas must be treated as "no-go" areas and demarcated as such. No vehicles, machinery, personnel, construction material, fuel, oil, bitumen or waste must be allowed into these areas without the express permission of and supervision of the ECO, except for rehabilitation work in these areas.	Y	4	No machinery, vehicles or storage areas were noted within wetlands or riparian areas.



72. Workers must be made aware of the importance of not destroying or damaging the vegetation along rivers and wetland areas and this awareness must be promoted throughout the construction phase.	Y	4	Construction workers were made aware of the importance of not destroying or damaging the vegetation along rivers and wetland areas through toolbox talks.
73. Freshwater ecosystems located in close proximity to the construction areas must be inspected on a regular basis (but especially after rainfall) by the ECO for signs of disturbance, sedimentation and pollution from construction activities. If signs of disturbance, sedimentation or pollution are noted, immediate action must be taken to remedy the situation and, if necessary, a freshwater ecologist must be consulted for advice on the most suitable remediation measures.	Y	4	The freshwater areas are inspected regularly for signs of disturbance, sedimentation or pollution.
74. No discharge of effluents or polluted water must be allowed into any rivers or wetland areas.	Y	4	No discharge of effluents or polluted water was noted/reported into rivers or wetland areas
75. If construction areas are to be pumped of water (e.g. after rains), this water must be pumped into an appropriate settlement area, and not allowed to flow into any rivers or wetland areas.	N/A	N/A	It was reported that no water was pumped into rivers and/or wetlands.
76. Workers must be made aware of the importance of not polluting rivers or wetlands and of not undertaking activities that could result in such pollution, and this awareness must be promoted throughout the construction phase.	Y	4	Construction workers were made aware of the importance of not polluting rivers and wetland areas through toolbox talks.
Roads and transportation			
77. Existing road infrastructure must be used as far as possible for providing access to the proposed turbine positions. Where no road infrastructure exists, new roads must be placed within existing disturbed areas or environmental conditions must be taken into account to ensure that minimum amount of damage is caused to natural habitats.	Y	4	Existing roads have been utilized as far as possible.
78. Signs must be placed along construction roads to identify speed limits, travel restrictions, and other standard traffic control information. To minimize impacts on local commuters, consideration must be given to limiting construction vehicles travelling on public roadways during the morning and late afternoon commute time.	Y	4	Appropriate traffic control measures and signage was in place during construction and the condition was adhered to. It was stated that construction vehicles were parked on site overnight limiting their movement/during peak travel hours.
79. Internal access roads must be located to minimize stream crossings. All structures crossing streams must be located and constructed such that they do not decrease channel stability or increase water velocity.	Y	4	Stream crossings were minimised as far as possible, where they were unavoidable, culverts were constructed in line with the approved site layout.
80. A designated access to the site must be created and clearly marked to ensure safe entry and exit,	Y	4	The site has a designated entrance with security.
81. Signage must be erected at appropriate points warning of turning traffic and the construction site.	Y	4	It was stated that appropriate signage was in place throughout construction phase.
82. Necessary permits must be obtained for the oversized construction vehicles to transport turbine components.	Y	4	Appropriate permits were obtained, in line with the Road Traffic Act (RTA) to transport turbine components.
83. Construction vehicles carrying materials to the site must avoid using roads through densely populated built-up areas so as not to disturb existing retail and commercial operations.	y	4	Given the location of the site, and through confirmation by the ECO, construction vehicles carrying material to site avoided densely populated built-up areas.
84. Signs must be placed along construction roads to identify speed limits, travel restrictions, and other standard traffic control information to minimize impacts on possible fauna species.	Y	4	Traffic signage was noted on the roads during the audit.
85. Road borders must be regularly maintained to ensure that vegetation remains short and that they therefore serve as an effective firebreak.	Y	4	No concerns were raised regarding vegetation along road boarders.



86. Roads must be designed such that changes to surface water runoff are avoided and erosion is not initiated.	N	2	Some erosion was noted along access road routes.
87. All construction vehicles must adhere to a low speed limit to avoid collisions with susceptible species.	NV	NV	This condition could not be verified during the audit.
Noise			
88. Routine noise measurements must be conducted during the operation of the facility and a complaints register must be opened and made available to affected parties and to the Department on request.	N/A	N/A	The facility has not yet entered the operational phase.
89. The holder of this authorisation must ensure that the construction staff working in areas where the 8-hour ambient noise levels exceed 75dBA wear ear protection equipment.	Y	4	It was stated that construction machinery had been fitted with silencers. Workers were also provided ear protection as required.
90. The holder of this authorisation must ensure that all equipment and machinery are well maintained and equipped with silencers.	Y	4	It was stated that construction machinery had been fitted with silencers.
91. The holder of this authorisation must provide a prior warning to the community when a noisy activity e.g. blasting is to take place.	Y	4	Blasting was undertaken at the beginning of con
92. Construction staff must be trained in actions to minimise noise impacts.	Y	4	Construction staff were trained through toolbox talks. Plant machinery were fitted with silencers.
93. The holder of this authorisation must ensure that the National Noise Control Regulations and SANS10103:2008 are adhered to and measures to limit noise from the work site are implemented.	Y	4	Construction staff were trained through toolbox talks. Plant machinery were fitted with silencers.
Visual resources			
94. The holder of this authorisation must reduce visual impacts during construction by minimising areas of surface disturbance, controlling erosion, using dust suppression techniques and restoring exposed soil as closely as possible to their original contour and vegetation.	N	2	Some erosion was noted along access road routes. Dust suppression was done using a mobile water tank to spray water on site.
95. A lighting engineer must be consulted to assist in the planning and placement of light fixtures in order to reduce visual impacts associated with glare and light trespass.	Y	4	A lighting layout was undertaken by a lighting engineer to fulfil this condition.
96. Lighting of main structures (turbines) and ancillary buildings must be designed to minimise light pollution without compromising safety, and turbines must be lit according to Civil Aviation Regulations.	Y	4	A lighting layout was undertaken by a lighting engineer to fulfil this condition. Relevant CAA permits were obtained in this regard.
97. Signage on or near wind turbines must be avoided unless they serve to inform the public about wind turbines and their function.	Y	4	Permanent signage that was near the turbine indicated the turbine number, and on the turbine was safety warning/instruction signage associated with the turbine.
98. Commercial messages and graffiti on turbines are prohibited. Murals and/or art paintings on turbines are only permitted subject to written approval from the Competent Authority.	Y	4	Permissions for murals was obtained from the CA.
98.1. The holder is authorised to apply a non-commercial mural to Turbine E1 (approximately 34006'34.43"S; 24036'4981"E), limited to a maximum height of 11 metres above the base of the turbine. The mural must not affect turbine visibility or interfere with applicable aviation safety requirements, and no lighting or additional visual elements are permitted without prior written approval from the Competent Authority.	Y	4	Measurement of murals, according to surveyor, is 10.2 meters.
Human health and safety			



99. A health and safety programme must be developed to protect both workers and the general public during construction, operation and decommissioning of the energy facility. The programme must establish a safety zone for wind turbines from residences and occupied buildings, roads, rights-of-way and other public access areas that is sufficient to prevent accidents resulting from the operation of the wind turbines.	N	2	Revision 03 of a draft HSE master plan was provided. The plan emphasizes social risk management during all phases of the project development, and no indication on appropriate setbacks distance or safety exclusion zones around wind turbines and associated infrastructure.
100. Potential interference with public safety communication systems (e.g. radio traffic related to emergency activities) must be avoided.	Y	4	No complaints with respect to interference of public communication systems were received.
101. The holder of this authorisation must obtain approval from the South Africa Civil Aviation Authority that the wind facility will not interfere with the performance of aerodrome radio Communication, Navigation and Surveillance (CNS) equipment, especially the radar, prior to commencement of the activity. A copy of the approval must be kept on site by the ECO.	Y	4	The relevant CAA approvals have been obtained
102. The holder of this authorisation must ensure that the operation of the wind facility complies with the relevant communication regulations or guidelines relating to electromagnetic interference, e.g. microwave, radio and television transmissions.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
103. The holder of this authorisation must obtain approval from the South Africa Weather Services (WeatherSA) that the energy facility will not interfere with the performance of their equipment, especially radar, prior to commencement of the activity. A copy of the approval must be kept on site by the ECO.	Y	4	The relevant SAWS approvals have been obtained.
104. The holder of this authorisation must train safety representatives, managers and workers in workplace safety. The construction process must be compliant with all safety and health measures as prescribed by the relevant act.	Y	4	Revision 03 of a draft HSE master plan was provided. Additionally, an induction presentation of workplace safety and every employees' commitment to be their 'brother's keeper' was submitted.
105. Liaison with land owners/farm managers must be done prior to construction in order to provide sufficient time for them to plan agricultural activities.	Y	4	Liaison with landowners was undertaken in July 2023.
106. No unsupervised open fires for cooking or heating must be allowed on site.	Y	4	It was indicated that no open fires were permitted on site. No evidence of open fires was noted.
<u>Hazardous materials and waste management</u>			
107. Areas around fuel tanks must be bunded or contained in an appropriate manner as per the requirements of SABS 089:1999 Part 1.	Y	4	Fuel tanks of were kept on site. The tanks were adequately bunded.
108. Leakage of fuel must be avoided at all times and if spillage occurs, it must be remedied immediately.	Y	4	Spills were cleaned and disposed off appropriately. Hazardous waste disposal corticates were kept on file.
109. Hazardous waste such as bitumen, oils, oily rags, paint tins etc. must be disposed of at an approved waste landfill site licensed to accept such waste.	Y	4	Hazardous waste was removed by a reputable and waste service providers and waste disposal records were kept on file.
110. No dumping or temporary storage of any materials must take place outside designated and demarcated laydown areas, and these must all be located within areas of low environmental sensitivity.	Y	4	No dumping/evidence of dumping was noted during the audit.
111. Hazardous substances must not be stored where there could be accidental leakage into surface or subterranean water.	Y	4	Hazardous waste /substances is stored in appropriate waste receptacles.
112. 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	NV	NV	Not verified. There were no hazardous materials/vehicle maintenance were noted to be used in the specified sensitive areas during the inspection.



maintenance occur within 350m of the temporal zone of wetlands, a drainage line with or without an extensive floodplain or hillside wetlands.			
113. Temporary bunds must be constructed around chemical storage to contain possible spills.	Y	4	Bunds are constructed around the temporary stores.
114. Spill kits must be made available on-site for the clean-up of spills.	Y	4	Spill kits provided as per the waste management plans.
115. 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).	Y	4	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
116. The holder of this authorisation must provide sanitation facilities within the construction camps and along the road so that workers do not pollute the surrounding environment. These facilities must be removed from the site when the construction phase is completed as well as associated waste to be disposed of at a registered waste disposal site.	Y	4	Sanitation facilities were provided throughout the construction phase.
117. The holder of this authorisation must take note that no temporary site camps will be allowed outside the footprint of the development area as the establishment of such structures might trigger a listed activity as defined in the Environmental Impact Assessment Regulations, 2014 as amended.	Y	4	All site camps/temporary facilities were located within the approved development footprint.
Excavation and blasting activities			
118. Underground cables and internal access roads must be aligned as much as possible along existing infrastructure to limit damage to vegetation and watercourses.	Y	4	All underground cables are laid in accordance with approved layout. Where water crossings could not be avoided, water use authorisations are in place.
119. Foundations and trenches must be backfilled with originally excavated materials as much as possible. Excess excavation materials must be disposed of only in approved areas or, if suitable, stockpiled for use in reclamation activities.	Y	4	All excavations and blasting were completed during construction phase. Trenches have been backfilled.
120. Borrow materials must be obtained only from authorised and permitted sites. Permits must be kept on site by the ECO.	Y	4	3 borrow pits were authorised and the appropriate Borrow Pit Authorisations were shared with the ECO.
121. Anti-erosion measures such as silt fences must be installed in disturbed areas.	N	2	Anti erosion measures such as geotextiles have been installed in disturbed areas to prevent erosion, however erosion continues to be an issue in certain areas. Further interventions to deal with erosion are required in some of the disturbed areas where erosion continues to be an issue. Erosion across the Impofu East and North and west Wind Farm suggest its not under control, early onset gully erosion was observed at various areas, especially in the v-drains, side slopes of rehabilitated areas and along the roads.
Air emissions			
122. Dust abatement techniques must be used before and during surface clearing, excavation, or blasting activates.	Y	4	A mobile water tank was used to implement dust suppression on site.
123. Appropriate dust suppression techniques must be implemented on all exposed surfaces during periods of high wind. Such measures must include wet suppression, chemical stabilisation, the use of a wind fence, covering surfaces with straw chippings and re-vegetation of open areas.	Y	4	A mobile water tank was used to implement dust suppression on site.

Historical / cultural I paleontological resources			
124. No construction activities must be within 100 metres from archaeological sites and historical sites, the sites must be demarcated and fenced off. Should construction activities be within 100 metres from archaeological sites and historical sites, the sites must be demarcated and fenced off.	Y	4	Heritage site fenced with 'No-Go' sign displayed.
125. If concentrations of archaeological heritage material, fossils and human remains are uncovered during construction, all work must cease immediately and be reported to the South African Heritage Resources Agency (SAHRA) so that a systematic and professional investigation / excavation can be undertaken.	N/A	N/A	No concentrations of archaeological material were uncovered during construction.
126. Construction managers/foremen must be informed before construction starts of the possible types of heritage sites and cultural material that may be encountered and the procedures to follow when they find sites.	Y	4	Pre-construction archaeological training was undertaken by a suitably qualified and accredited professional Archaeologist from 'ArchaeoMaps' on 3 August 2023. Training was attended by both the client and the contractor's representatives.
127. All buffers and no-go areas stipulated in the ElAr must be adhered to for the facility, all roads and powerlines.	Y	4	All buffers and no-go areas were adhered to.
128. All construction and maintenance crew and vehicles (except small vehicles which may use existing farm tracks) must be kept out of the buffer zones.	Y	4	Noted by applicant. No vehicles noted in buffer zones during audit.
129. The final layout must be shown to the appointed archaeologist before implementation to confirm that all significant heritage resources have been adequately protected.	Y	4	ECPHRA Issued letter of no objection to the EA amendment for larger turbines but fewer turbines
General			
130. The recommendations of the EAP in the ElAr dated June 2019 and the specialist studies attached must be adhered to. In the event of any conflicting mitigation measures and conditions of the Environmental Authorisation, the specific condition of this Environmental Authorisation will take preference.	N	2	Some non-compliances were noted with respect to certain of the EMPr conditions.
131. A copy of this environmental authorisation, the audit and compliance monitoring reports, and the approved EMPr, must be made available for inspection and copying-	Information item	Information item	Audited under items below
131.1. at the site of the authorised activity;	Y	4	A copy of the EA and EMPr is available at the site
131.2. to anyone on request; and	Y	4	Copies of the approvals are made to anyone on request
131.3. where the holder of the environmental authorisation has a website, on such publicly accessible website.	N	2	Only the EA and their amendments were available on Enel Geen Power's (EGP) website.
132. National government, provincial government, local authorities or committees appointed in terms of the conditions of this authorisation or any other public authority shall not be held responsible for any damages or losses suffered by the holder of the authorisation or his/her successor in title in any instance where construction or operation subsequent to construction be temporarily or permanently stopped for reasons of non-compliance by the holder of the authorisation with the conditions of authorisation as set out in this document or any other subsequent document emanating from these conditions of authorisation.	N/A	N/A	Information item.



Table 4: Audit Findings for the East Environmental Management Programme

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
PRE-CONSTRUCTION PHASE			
LEGAL COMPLIANCE			
EMPr inclusion			
This EMPr is an extension of the conditions of the Environmental Authorisation and is binding on all parties involved in this project.	N/A	N/A	Information item
This EMPr is to form part of the contract documentation for tender such that the Contractor/s is/are aware of its conditions and associated pricing implications.	Y	4	It was confirmed by interview process that the EMPr and EA's formed part of the contractors appointments and contracts.
This EMPr has been updated based on detailed designs and the Final Site Layout Plan. This was informed by the specialist walk-through and micro-siting process that was used to provide environmental requirements with regards to pylon locations, routing options, access choices and mitigation / management options.	Y	4	Final revision of the EMPr was issued on the 17th of May 2023. This complied with the EA requirements as confirmed by the DFFE letter dated 13/06/2023. The final layout was informed by the specialist walk through.
The appointments associated with the project team required to implement this EMPr shall be made prior to any activities (that may require their attention) being undertaken.	Y	4	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Permits, licenses, and registrations			
These measures will ensure that activities are executed in accordance with the law and requirements of the relevant authority:			
Should any permits, licenses or registrations be required then the Proponent shall ensure that these are applied for by a relevant specialist/professional, and that these are obtained prior to such activities commencing. Typical activities include (but are not restricted to): • The rescue, relocation or destruction of certain protected plants. • The disturbance, damage, destruction or alteration of known heritage resources. • Any water uses as listed in Section 21 of the National Water Act (No. 36 of 1998). • Proposed quarries, borrow pits, or sand mining operations. • The subdivision, rezoning or registration of a servitude.	Y	4	Complied. Search and rescue was undertaken in accordance with Impofu East Plant Rescue and Protection. Relevant search and rescue certificates were made available to the auditor. Heritage features have been cordoned off. All necessary licenses and permits and licenses have been obtained.
Permits to rescue, transport, translocate or destroy protected plants in terms of NEM:BA	Y	4	Plant Search and Rescue Permit issued 19/04/2023 by DEDEAT.
Protected plant species may require a permit to be issued by the DEDEAT in terms of the National Environmental Management: Biodiversity Act (No. 10 of 2004) and the East Cape Nature and Environment Conservation Ordinance	Y	4	The necessary NEMBA/ East Cape Nature and Environment Conservation Ordinance (1974) permit in place.



(1974) before they may be disturbed, rescued, transported, translocated or destroyed. While micro-siting has attempted to avoid SCCs as far as possible, there are still some areas where permits will be required. These will be applied for ahead of construction commencing. Refer to the list of Protected plant species in the Terrestrial Ecology micro-siting report. Species that will not translocate well should be destroyed, but those that have a good chance of surviving (e.g. bulbs) should be relocated.			
Where protected trees species listed under the National Forest Act cannot be avoided or where clearance of forest is required, then the relevant permits shall be obtained from the Department of Agriculture, Forestry and Fisheries (DAFF). Based on micro-siting, no forest will be affected by the development. However, there is a ***Sideroxylon inerme*** (*White Milkwood*) tree which is protected under the NFA. The ***S. inerme*** tree at the Klipdrift River bridge crossing must be avoided.	Y	4	Received exemption letter for pruning of Milkwood tree.
Permits to damage or destroy heritage resources in terms of the NHRA			
If it is not possible to avoid the archaeological sites, or mitigation is found to be more feasible than in-situ conservation, a permit in terms of Section 35 of the National Heritage Resources Act (No 25 of 1999) (NHRA) and Chapter IV of the NHRA Regulations must be applied for by a professional archaeologist prior to construction. Mitigation of the archaeological sites may only occur if permitted by the South African Heritage Resources Agency (SAHRA) or the Eastern Cape Provincial Heritage Resources Agency (ECPHRA). The archaeologist's micro-siting report has confirmed that there are no sensitive archaeological sites that are affected by the Final Site Plan. Should archaeological evidence be found a Chance Find procedure should be followed.	Y	4	Archaeological site was avoided. It was fenced of with 'no-go area' signage displayed and area was monitored frequently.
Water Use Licenses (or permissible uses) in terms of the NWA			
Section 21 of the National Water Act (No. 36 of 1998) recognises water uses that are to be licensed (unless these are existing lawful uses, permissible in terms of Schedule 1, or permissible in terms of a General Authorisation) before they may commence. An integrated Water Use License Application will be required for the following water uses listed in Section 21: a, b, c, g and i. General Authorisations were issued to Red Cap Impofu for water uses listed under Section 21: a, c, i & g.	Y	4	Necessary GAs were obtained by RedCap Impofu.
License/permits for Mining in terms of the MPRDA			
Mining activities such as sand mining, borrow pits and quarries may require permits or licenses from the Department of Mineral Resources in terms of the Mineral and Petroleum Resources Development Act (No. 28 of 2002) before they may commence.	Y	4	Section 53 approvals and borrow pit permits were obtained as required.



Right to land and access acquisition			
These measures will ensure good relationships with landowners and occupiers of land:			
All land negotiations for the development sites are to be resolved prior to layout designs being finalised.	Y	4	Landowner engagement pre-construction engagements were undertaken in 2023/07/23 to fulfil this condition.
Written consent is to be obtained for the use (access or occupation) of private land outside of the approved development sites.	N/A	N/A	No land outside of approved sites was utilised. All affected landowners were contacted.
DETAILED DESIGN PHASE CONSIDERATIONS			
Environmental sensitivities for pre-construction			
These measures will ensure that the requirements of the specialists pertaining to specific environmental sensitivities will be integrated into the design phase:			
The design site layout (the turbine positions, the servitudes, the locations of the power line infrastructure, buildings and access roads (temporary or permanent)) is to accommodate: • The sensitive areas and associated buffer requirements identified by the Specialists in the Environmental Impact Assessment Process. • Any landowner requirements that are already known.	Y	4	The turbines avoid all sensitive areas and take into account landowner requirements where applicable, in line with the final site layout planRelevant specialists have done a site walkthrough using the plan provided at detailed design phase. The No-Go layer was updated to incorporate additional sensitive areas identified in this micro-siting process. The Final Site Layout Plan has been developed based on these, and specialists have confirmed that the Final Plan is acceptable.
The expertise of a Terrestrial Ecologist, an Aquatic Ecologist, an Archaeologist and an Avifaunal Specialist are to be enlisted to conduct a post-authorisation walkthrough with the design engineers as a micrositing exercise.	Y	4	Micrositing exercise was completed. Detailed designs have been done, and specialists have done a walkthrough of the site to check the position of structures and infrastructure. Micro-siting reports have been produced and the Final Site Plan has been developed. Specialists have confirmed that the Final Site Plan is acceptable. Additional mitigation measures provided by specialists in the micrositing process are included in this updated EMPr, where relevant.
Final adjustments to the layout shall be made once the specialist micrositing recommendations from the walkthrough process have been provided. Any No-Go Areas (areas that shall be excluded from any construction activity or general access by the construction team) within the development sites or servitudes shall be clearly indicated on maps and included with the micrositing reports or attached to this EMPr.	Y	4	A Plan was developed at detailed design stage and provided to specialists to do a walkthrough. The agricultural specialist noted that Turbine 19 and 22 conflicted with a macadamia orchard. The Turbines were slightly shifted to avoid impacts on the current farming activities and planned expansion activities. No other issues were identified by specialists. All specialists have confirmed that the Final Site Layout Plan is acceptable. A *Sideroxylon inerme* tree at the Klipdrift River bridge crossing must be avoided if the road is upgraded for construction purposes. Micrositing exercise was completed. No additional no-go areas identified.
Terrestrial Ecology			
The Terrestrial Ecologist shall undertake a pre-construction walkthrough to further refine the layout and reduce impacts on the Species of Conservation Concern through micrositing of the turbines and access roads.	Y	4	Walkthrough done and the location of Protected plant species have been indicated. Permit applications have been submitted where structures / infrastructure coincide with SCCs. The specialist indicated that the *Sideroxylon inerme* tree at the Klipdrift River bridge (near Oyster Bay) must be avoided when the road is upgraded.



Identified areas of high fauna importance at the design stage (as achieved in the current layout) are to be avoided.	Y	4	The avifaunal and bat specialists have provided micro-siting reports and updated management plans based on the Final Site Plan. No changes to the Site Layout Plan are required. The avifaunal specialist has provided additional mitigation measures and has updated the Monitoring Plan. The bat specialist has updated the Bat Mitigation Plan.
The design of roads and other infrastructure is to consider faunal impacts and allow fauna to pass through or underneath these features wherever possible.	Y	4	Roads designed appropriately
The electrical fencing shall be designed to have a 20 cm gap off the ground. This is to reduce impact to tortoises that can become stuck against such fences and be electrocuted to death.	Y	4	The only areas with electric fencing are the substation areas. The fence is designed appropriately
Aquatic Ecology			
The Aquatic Ecologist shall undertake a final pre-construction walkthrough as part of a plant search and rescue plan, with the appropriate permits in place.	Y	4	The Aquatic Ecologist has done a walkthrough of the site. No additional mitigation measures have been provided. The current mitigation measures are re-iterated.
The Aquatic Ecologist shall undertake the post-authorisation walkthrough to assist in developing a wetland rehabilitation and monitoring plan, and potentially updating a stormwater management plan. The Wetland Rehabilitation and Monitoring Plan and Updated Stormwater Management Plan have been developed and are attached as Appendices.	Y	4	The Wetland Rehabilitation and Monitoring Plan and Updated Stormwater Management Plan have been developed and are attached as Appendices to the approved EMPr.
Where any road crossings will be upgraded, detailed design should take cognisance of the following: • All pipe culverts shall be removed and replaced with suitably sized box culverts, where road levels are raised. • If any of the delineated wetlands occur within 50 m of the existing crossings, then a detailed monitoring plan must be developed.	Y	4	Pipe culverts have been replaced by box culverts.
Effective stormwater management must include effective stabilisation (e.g. gabions and Reno mattresses) and the re-vegetation of any disturbed riverbanks.	Y	4	No issues not with respect to stabilization of river banks. Refer to the attached Stormwater Management Plan.
Bats			
Detailed design shall prescribe: • Lights with low sensitivity motion sensors, that can switch off automatically when no persons are nearby, to prevent the creation of regular insect gathering pools that would attract bats. • Aviation lights should remain as required by aviation regulations. • Floodlights should be down-hooded and where possible, lights with a colour (lighting temperature) that attract less insects should be used. • The storm water drainage plan must avoid creating of artificial ponds/open water sources or wetlands in turbine zones (less than 290 m from any turbine base), as these will increase insect activity and therefore bat activity in the area.	Y	4	The Bat management plan submitted/attached to the EMPr prescribes the requirements in line with this condition.
Avifauna			



The turbine layout shall avoid sensitive bird habitats such as wetlands and dams (this mitigation measure was adopted at screening phase and implemented in the initial turbine layout).	Y	4	Micro-siting confirms that the Final Site Plan avoids these areas, and that the pylon designs are acceptable.
An avifaunal walkthrough shall be conducted to: • Confirm final turbine layout, • Identify any new sensitive species breeding sites, • Identify any sensitivities that may arise between environmental authorisation and the construction phase.	Y	4	Avifaunal micro-siting report was done and confirms that the Final Site Layout is acceptable. The Bird Monitoring Plan has been updated. Additional operational phase mitigation measures have been provided.
Monitoring of breeding status of Martial Eagles shall be conducted in all breeding seasons prior to and during construction.	Y	4	An updated Monitoring Plan has been provided in the Avifaunal Micro-Siting Report. The last monitoring event by an avifaunal specialist was conducted on the 20th of August 2025. It was reported that breeding had likely taken place at the time, and that it was worth noting that the Martial Eagles do not breed the same time every year.
Pylons or poles shall be designed according to Eskom approved bird friendly designs to ensure that perching large birds cannot be electrocuted.	Y	4	The final pylon type was to be the standard Eskom “Intermediate self-supporting DDT 7611” and “Guyed Angle Strain structure DDT 7645”. These are both safe designs for large eagles as the clearances are sufficient. The Avifaunal micro-siting report confirmed that the pylon design, and current grid connection power line alignment is acceptable from a bird electrocution perspective.
Overhead conductors or earth wires shall be designed to be fitted with an Eskom approved anti bird collision line marking device to make cables more visible to birds in flight and reduce the likelihood of collisions.	Y	4	Site inspection showed that bird flight diverts were fitted (BDF's) as recommended by the Avifaunal Walk-through. The Eskom 'BIRD COLLISION PREVENTION GUIDELINE' was also submitted as evidence of compliance.
Provision for a mitigation contingency budget for the operational phase should be made for the potential avifaunal impacts that may arise during operation.	N/A	N/A	The Avifaunal specialist updated the mitigation measure to include - it is likely given the current state of knowledge in SA, that an Observer Led Shutdown On Demand programme would be the preferred mitigation measure if required. Operational phase had not commenced at the time of the audit.
Agriculture			
Detailed design shall prescribe cattle grids where necessary to mitigate risks of gates being left open.	NV	NV	Not verified.
Archaeology			
Before the potential three sections of 33kV overhead line are constructed, a final micro-siting walkthrough shall be undertaken to ensure that any unforeseen impacts due to this line are mitigated.	Y	4	The archaeological specialist has inspected the Final Site Plan and issued a micro-siting report confirming that no new / additional sensitive areas were identified, and the original No-Go Areas map remains. The Final Site Plan avoids the sensitive heritage areas identified in the EIA and Amendment Application.
Visual			
Where substations are to be located near main roads or district roads, and where highly visible from these roads, then the design is to include screening such as earth berms or landscaping (tree or hedge planting).	N/A	N/A	No substations are located near main/district roads. Substations are located near local/farm access roads where they do not create a visual nuisance.



Design consideration for lighting choices on turbines and facilities include: • Navigation lights to be kept to the minimum allowed by the Civil Aviation Authority. • Security and area lighting at substations and Operation and Maintenance buildings to be fitted with reflectors to minimize light spillage. • Low-level lights to be used in preference to lamp standards.	Y	4	Lighting designed by a suitably qualified lighting engineer and approved by CAA. The final lighting layout was designed to fulfil the requirements of this condition.
Design considerations for signage/billboards include: • External signage to be kept to a minimum and billboard type signs avoided.	NV	NV	Not verified. Signage was generally kept at a minimum during construction, and primarily indicated direction of the site camp, 'no-go' areas and sensitive areas, speed limits, borrow pits, among others.
Traffic			
The Traffic Management Plan needs to be updated to: • Clearly define route to site for specific vehicles needed to transport equipment and materials; and • Schedule delivery to avoid local congestion.	Y	4	The Project Traffic Management Plan was been updated in 2022. Road works on public road network associated with the development mostly included upgrading of the roads.
Socio-Economic			
The Proponent shall engage with local authorities and business organisations to investigate the possibility of procuring construction materials, goods and products from local suppliers where feasible.	NV	NV	Not verified
Organise local community meetings to advise the local labour force about the project that is planned to be established and the jobs that can potentially be applied for.	Y	4	The appointed stakeholder relations manager facilitated public meetings providing updates on the project status and employee/SMME intakes. The Proponent also addressed some of the claims/grievances the SMME's had. For instance, employment of SMME's outside Kouga Municipality.
Establish a local skills desk (in Humansdorp) to determine the potential skills that could be sourced in the area.	NV	NV	Not verified.
Engage with relevant local authorities (and provincial if necessary) and inform them of the development as well as discuss with them their ability to meet the additional demands on social and basic services created by the in-migration of workers.	NV	NV	Not verified.
Management plans			
These measures will ensure that the specific specialist requirements resulting from the micrositing exercise will be captured:			
The following Management Plans are included as Appendix 5 of this report: • Plant Rescue and Protection Plan • Listed Invasive Alien Plant Species Management Plan • Avifauna and Bat Monitoring and Management Plan • Revegetation and Habitat Rehabilitation Plan • Open Space Management Plan – this is relevant to management of Wind Farm activities so as not to impact on open space areas beyond the footprint of the Wind Farm (for example erosion, poaching etc.).	Y	4	These Management Plans have been updated where required, based on the Final Site Plan and micrositing exercise. These are attached as Appendices to the EMPr document.



• Traffic Management Plan • Stormwater Management Plan • A Fire Management Plan • An Erosion Management Plan			
The following Management Plans are to be developed and finalised post-authorisation: •Transportation Management Plan • Wetland Rehabilitation and Monitoring Plan	Y	4	Management plans were developed and implemented.
Tender considerations			
These measures will ensure that the specialist requirements for tender are included:			
The approved construction footprint shall be issued as a formal drawing, that would require a request for revision with substantial motivation should a larger or amended construction footprint be required.	NV	NV	Not verified. Amendments to the EA and EMPr to reduce the number of turbines also reduced the construction footprint. However, environmentally sensitive areas did not increase i.e. there were no new sensitive areas that were identified.
The recruitment selection process shall seek to promote gender equality.	NV	NV	Not verified. There was no confirmation of the measures implemented to fulfil this requirement.
The terms of Contract shall include mechanisms for disciplinary action for environmental transgressions (such as the issuing penalties and fines), and the recovery of any monies due (including for any remedial costs where these were born by a third party).	NV	NV	Not verified. The Auditor was not privy to the details of the Terms of Contract(s) drafted by the EA holder.
The terms of Contract shall include for the liabilities in terms property damage or fire-fighting costs of runaway fire proven to be caused by a member of the Contractor's team or construction activities.	NV	NV	Not verified. The Auditor was not privy to the details of the Terms of Contract(s) drafted by the EA holder.
CONSTRUCTION PHASE			
CODE OF CONDUCT			
Personal conduct			
These measures will ensure that the personal conduct of all staff is environmentally and socially considerate:			
The Code of Conduct and the conditions of the EMPr apply to all staff involved in the project, including (but not limited to) the Engineer and Contract Manager, Contractor(s) and staff (including Sub Contractors and staff), EAPs, Environmental Specialists, and other service / product providers (including the survey teams, material delivery teams, geotechnical or other specialist teams).	NV	NV	Not verified.
All staff must wear the appropriate safety gear, utilize the appropriate safety equipment, and adhere to the appropriate safety laws & standards (including the Occupational Health and Safety Act, Act No 85 of 1993 (OHSA).	Y	4	Safety officers on site ensured that no work activities proceeded without a pre-work checklist being completed. Hard hats, reflective shirts, safety boots, safety glasses, etc. were work by the staff.
Teams working outside of the development sites (including the contractor's camp/s) or requiring access to private properties are to carry identification on their persons that includes their name and company of employ, with reference	Y	4	All working teams carried work permits which specified the specific areas of work and anticipated duration.



to the project. Similarly, such information should be displayed on vehicle dashboards / exteriors.			
No firearms or weapons of any description are to be allowed on site, unless required by security personnel.	Y	4	Daily security checks ensured there were no weapons of any description on site.
Private property access is only permitted on previous agreement with the affected landowner or will be considered trespassing.	Y	4	Landowners were frequently updated about possible deviation from scope of works and permission was requested by the Contractor/Developer.
No swimming, bathing, or washing activities may occur in any water source / body on or adjacent to the development sites other than those supplied specifically for such use.	Y	4	Water resources were monitored frequently and supervisors reminded their teams about safe works.
Ablution activities may only occur in designated facilities.	Y	4	Teams on site had designated mobile toilets that were labelled clearly.
All staff are to make use of the facilities provided for them, as opposed to ad-hoc alternatives, (e.g. fires for cooking, use of the surrounding areas / bush as a toilet).	Y	4	Requirements of the EA, EMPr and GA were communicated to all staff during induction. Additionally, the team supervisors and construction management conducted toolbox talks to re-iterate these requirements.
All staff are to make use of the facilities provided for them, as opposed to ad-hoc alternatives, (e.g. fires for cooking, use of the surrounding areas / bush as a toilet).	Y	4	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Unauthorised access inside No-Go areas is prohibited.	Y	4	No-go areas were demarcated and labelled clearly across the site. Staff were frequently reminded about the importance of practicing environmental care.
All staff involved in the project shall adhere to the rules set by the Proponent, in line with the specified laws and regulations.			Not verified.
Environmental care			
These measures will ensure that all staff exercise environmental care:			
Biodiversity Care			
Any unauthorised disturbance or damage to open space areas or flora and fauna outside of the development sites (including the contractor's camp/s) is prohibited and may be subject to reinstatement or rehabilitation to the culprit's cost.	Y	4	Prohibition of damage to fauna and flora was communicated to all staff during site induction. Furthermore, this condition was frequently communicated to all teams on site through toolbox talks and.
Hunting or snaring any animal (mammal, reptile, amphibian, bird, insect or fish) is prohibited. Capturing any animal is prohibited, unless on instruction from the ECO where the animal is at risk from the development activities. No animal may be wilfully harmed unless it threatens the life of a person, or the person is in imminent danger.	Y	4	There were no animals that were harmed on site during construction and there were no dangerous animals that threatened the life of persons on site.
Collecting, cutting, clearing, burning or otherwise disturbing plant material not designated for clearing or rescue is prohibited.	Y	4	There was no unnecessary or unauthorised vegetation clearance during site clearance and establishment. The ECO and contractor EO's monitored active works around sensitive areas on site.
Any person found to be deliberately or negligently polluting any part of the development sites (including the contractor's camp/s), or adjacent areas will face disciplinary action.	Y	4	Disciplinary action was taken by management if a person was guilty of polluting any part of the development site. The teams conducted housekeeping after every shift to ensure that the site is kept neat.



The unauthorised abstraction / use of water from any water sources / bodies on the site is prohibited.	Y	4	General Authorisation (GA) for taking water from the OYSTER Bay Dam was granted in November 2019. Furthermore, GA's for abstraction of water from registered boreholes were issued to the EA holder in July 2024.
The use of any natural water sources (e.g. springs, streams, open water bodies) for the purposes of bathing, or the washing of machinery, equipment or clothes is prohibited.	Y	4	The site had a designated wash bay area for machinery and/or equipment. There was no bathing or washing of clothes during the construction period.
The harvesting of firewood or any other natural resources from the development site (including the contractor's camp/s) or adjacent areas is prohibited.	Y	4	The EA holder adhered to this condition. There was no harvesting of firewood or unsupervised fires on site during the construction period.
The removal of boulders, rocks, pebbles, gravel, sand or any other material not designated for removal is prohibited.	Y	4	Construction material was sourced legally and within the parameters of the EMPr and relevant legislation.
Heritage Care			
Any persons found to be deliberately or negligently defacing, damaging, painting or marking natural features such as rock formations (with the exception of approved marking exercises during rescue operations) will face disciplinary action, and restoration or compensation as determined by the heritage authority may apply.	Y	4	There were no incidents relating to damaging or defacing that were reported to the ECO during construction. Site supervisors communicated practicing heritage care frequently during active works.
Any persons found to be deliberately or negligently defacing, damaging, destroying or altering a heritage resource as depicted in the sensitivity maps will be subject to disciplinary action, and restoration or compensation as determined by the heritage authority may apply.	Y	4	The Eastern Cape Provincial heritage Resources Authority (ECPHRA) received a formal heritage crime on the 19th of May 2025 for ground-disturbing activities i.e. excavations, that occurred without adequate archaeological monitoring. The developer reported that this was due to miscommunication and construction programme changes. Given that the development activity had been completed at the rime, ECPHRA formally placed the matter on record as a case of *post-facto* non-compliance with Section 35 of the NHRA.
SPECIALIST REQUIREMENTS			
Environmental sensitivities for construction			
Terrestrial Ecology			
A search and rescue operation for reptiles and other vulnerable species shall be conducted before areas of intact vegetation are cleared.	Y	4	The pre-construction report for Impofu WEF indicated that search and rescue (S&R) operations were undertaken by a qualified professional Botanist to carry out necessary flora S&R. The S&R operations commenced early December 2023.
All vehicles accessing the site should adhere to low speed limits (40km/h max) to avoid collision with susceptible species such as snakes and tortoises.	Y	4	Speed limit signage was erected and adhered to on site.
No excavated holes or trenches shall be left open for extended periods as fauna may fall in and become trapped.	Y	4	Excavation holes and trenches were tightly barricaded and appropriate signage erected.
Protected Plant species that have a good chance of successful translocation must be relocated during a search-and-rescue exercise. Permits must be obtained from the DEDEAT before this is done.	Y	4	The required search and rescue permits were obtained from the EC DEDEAT.
Aquatic Ecology			



All alien plant re-growth, which is currently high within the greater region shall be monitored and should it occur, these plants should be eradicated within the project footprint and especially in areas near the proposed water crossings. The scale of the operation does however not warrant the use of a Landscape Architect and / or Landscape Contractor	Y	4	The development site was already infested with alien plants before construction. However, new plants were monitored and managed accordingly.
Where any road crossings will be upgraded, construction shall take cognisance of the following: • River levels, regardless of the current state of the river / watercourse shall be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist during a post-authorisation walkdown, prior to commencement of the construction phase. • Approach road embankments especially where large cut and fill areas will be required shall be rehabilitated during the construction process, to minimise erosion. • Suitable stormwater management systems shall be installed and monitored during the first few months of use. Any erosion / sedimentation must be prevented.	N	2	Road crossings have been upgraded, with pipe culverts upgraded to box culverts as required. Adequate stormwater management infrastructure including culverts has been installed, however, erosion was noted in some sections during the site inspection
The appropriate permits from DEDEAT and DAFF shall be obtained prior to disturbing/removing any protected plants.	Y	4	Permission to remove and relocate protected plant was issued by Department of Economic Development, Environmental Affairs (DEDEAT) on the 19th of April 2023.
Mechanical plant and bowsers shall not be refuelled or serviced within or directly adjacent to any channel.	Y	4	Signage indicating 'No refuelling' was placed close to environmentally sensitive areas.
All construction camps, lay down areas, batching plants or areas and any stores shall be more than 50 m from any demarcated watercourses.	Y	4	The construction camps and laydown areas were constructed according to the final approved site layout.
Emergency plans shall include for spillages onto road surfaces and water courses.	Y	4	The emergency preparedness plan accounted for emergency response to contamination of soils, ground and surface water as a result of spillages and leakages.
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.	Y	4	Fuel tanks stored on site were equipped with a bund structure and the appropriate signage displayed.
No stockpiling should take place within a watercourse.	Y	4	General foremen were notified of sensitive areas and no-go zones on site, and the environmental team advised on the suitable areas for stockpiling
Vegetation clearing should occur in a phased manner in accordance with the construction programme to minimise erosion and/or run-off.	Y	4	There was no unnecessary vegetation clearance and the erosion management plan was implemented.
All cleared areas must be re-vegetated after construction has been completed	N	2	All cleared areas are currently undergoing rehabilitation. Certain cleared areas which the landowners requested to remain as is, to allow them to be used for storage for their farming operations, are struggling to establish. Other cleared areas such as laydown area at WTG E13 were also struggling to re-establish vegetation. This can be mainly attributed to trampling by cattle.
Bats			



Rehabilitate cleared vegetation where possible at areas such as temporary laydown areas.	N	2	All cleared areas are currently undergoing rehabilitation. Certain cleared areas which the landowners requested to remain to allow them to be used for storage for their farming operations and certain areas were noted where vegetation is struggling to establish, mainly due to trampling by cattle (for example East 13). Because of this the condition cannot be marked as fully compliant.
Avifauna			
Monitoring of breeding status of Martial Eagles shall be conducted in all breeding seasons prior to and during construction.	Y	4	Monitoring in all breeding season took place as required. The last monitoring event occurred on the 20th of August 2025.
Overhead conductors or earth wires shall be fitted with an Eskom approved anti bird collision line marking device, as per design, to make cables more visible to birds in flight and reduce the likelihood of collisions.	Y	4	Eskom approved bird diverters were placed throughout the overhead line.
Removal of alien trees in the area could make a significant contribution to improving this environment. Consideration should be given to such removal during construction where possible. This is not compulsory but voluntary and would make a meaningful difference to the receiving environment	NV	NV	It was not verified if alien trees were removed from site during construction. The condition is marked as voluntary and therefore was not scored.
Palaeontology			
The recording and sampling of significant fossil discoveries shall be undertaken by a professional palaeontologist, and any potential fossil finds shall be safeguarded and reported to ECPHRA.	N/A	N/A	No fossils were discovered during construction.
Archaeology			
The Stone Age quarry site at IE8 (34 8'59" S and 24 39'36" E) is avoided by the layout of the project, but as it is in close proximity to development it shall be made a No-Go Areas, and shall be protected from damage during the construction phase of the project: • The site shall be enclosed with a temporary fence for the construction phase of development. Fencing should be a temporary standard 4 strand 1.2 m cattle fence. • Large clear 'No-Go Area' signs shall be attached from the top strand of the fence at intervals of every 15 m. These measures must be in place prior to the construction phase of the wind farm development. The temporary fencing erected around the No-Go Area IE8 ((34 8'59" S and 24 39'36" E) shall be removed after construction. It is recommended that no signage or fencing is used during the operational phase as this may attract unwanted attention and possible damage to the archaeological resource.	N	2	The area is cordoned off with appropriate fencing and marked as a no-go area. At the time of the audit however the fencing was damaged and required repair.
A suitably qualified and accredited professional archaeologist shall be appointed to undertake archaeological monitoring during the construction phase, including the fencing of any No-Go areas prior to construction.	N	2	A qualified and accredited archaeologist was appointed to undertake the required archaeological monitoring. However, on the 19th of May 2025 ground-disturbing activities i.e. excavations, occurred without adequate archaeological monitoring. The developer reported that this was due to miscommunication and construction programme changes.



The contractor must supply the appointed archaeologist with the construction programme at least 4 weeks before construction starts to ensure the monitoring can be properly planned.	N	2	On the 19th of May 2025 ground-disturbing activities i.e. excavations, occurred without adequate archaeological monitoring. The developer reported that this was due to miscommunication and construction programme changes. The ECHPRA issued response noting acceptance of the above management and no further action or non-compliance was noted.
It is recommended that archaeological monitoring be undertaken by a suitably qualified and accredited professional archaeologist during the construction phase for any construction that takes place in the area south of the white dashed line as indicated in Appendix 2.	Y	4	An accredited professional archaeologist form 'ArchaeoMaps' was appointed for archaeological monitoring during the construction phase. It is worth noting that on the 19th of May 2025 ground-disturbing activities i.e. excavations, occurred without adequate archaeological monitoring. The developer reported that this was due to miscommunication and construction programme changes. The ECHPRA issued response noting acceptance of the above management and no further action or non-compliance was noted.
Noise & Shadow Flicker			
A proactive warning system shall be established to inform affected community members of the planned construction activities with an estimation of the commencement date and duration of each activity.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Visual			
Construction camps and storage/stockpile areas to be located in unobtrusive positions in the landscape, away from main roads, farmsteads and scenic areas, or alternatively screening measures utilised, as implemented in the current layout.	Y	4	Construction camps were located away from main roads and scenic areas. Storage/stockpiles were earmarked in consultation with the landowners.
Construction camps to be clearly delineated and limited in size to only that which is essential.	Y	4	Construction camps were constructed according to the approved method statements. The camps were optimally sized with no redundant space and they were clearly fenced.
Company/Organization			
Create local WhatsApp Groups: • Post notices of road conditions and propose alternatives. Notify users of expected deliveries and propose alternative routes.	Y	4	A WhatsApp group was created to notify immediate landowners of construction works that may impact traffic and possible time delays during deliveries to site, and proposed alternatives. The Proponent also coordinated with the South African Police Service (SAPS) to ensure that delivery of major equipment such as turbine blades, was undertaken safely.
Proponent to contribute to the maintenance of the public roads in the area during construction phases of the development.	Y	4	The appointed Contractor for civil balance of plant was responsible for upgrading and maintaining existing and public roads, as indicated in the '57 TRAFFIC MANAGEMENT PLAN – EXTERNAL PUBLIC ROADS'.
Upgrade unpaved roads to suitable condition for proposed construction vehicles.	Y	4	The appointed Contractor for civil balance of plant was responsible for upgrading and maintaining existing and public roads, as indicated in the '57 TRAFFIC MANAGEMENT PLAN – EXTERNAL PUBLIC ROADS'. Furthermore, the roads required maintenance for the equipment/material delivered to site.



Post relevant road signage along affected routes.	Y	4	Signage illustrating construction works such as mobile yellow plant, including temporary speed limits, were displayed on all affected public roads.
Provide advance driver training to key personnel, including truck drivers.	NV	NV	Not verified.
Socio-Economic			
The Proponent shall encourage the main contractors to increase the local procurement practices and promote the employment of people from local communities, as far as feasible, to maximise the benefits to the local economies.	NV	NV	Not verified. The ECO reported that the Proponent strongly encouraged the main contractors promote the employment of people, and SMME's, from local communities.
Recruit local labour as far as feasible.	NV	NV	Not verified.
Employment of labour-intensive methods in construction where feasible.	NV	NV	Not verified.
Sub-contract to local construction companies particularly SMME's and BBBEE compliant and women-owned enterprises where possible.	NV	NV	Not verified.
Use local suppliers where feasible and arrange with the local SMME's to provide transport, catering and other services to the construction crews.	NV	NV	Not verified.
Facilitate knowledge and skills transfer between foreign technical experts and South African professionals during the pre-construction and construction phases.	NV	NV	Not verified.
Set up apprenticeship programmes to build onto existing skill levels or develop new skills amongst construction workers especially those from local communities.	NV	NV	Not verified.
Ensure a community liaison officer is active in the nearby towns and ensure adherence to strict labour recruitment practices that would reduce the desire of potential job seekers to loiter around the properties in the hope of finding temporary employment.	NV	NV	Not verified.
An HIV/AIDS/TB awareness programme for all construction workers shall be implemented at the outset of the construction phase.	Y	4	Policy and posters were available at the site camp during construction.
GENERAL REQUIREMENTS			
No-Go Areas			
These measures will ensure that No-Go Areas will be protected:			Information item
A temporary fence/barricade shall be erected and maintained around the perimeter (including any specified buffers) of No-Go areas.	Y	4	No-go areas had been demarcated as such.
Development related activities inside No-Go areas shall be prohibited, and access restricted.	Y	4	No development was noted in identified no-go areas
Emergency preparedness			
These measures will ensure that staff are prepared for and able to respond to emergency situations (as best as possible) to reduce the risk of injury or incident:			Information item
Emergency procedures			



The procedures for dealing with an environmental incident or public complaint as described in Section 3.3 and Section 3.4 shall be communicated to relevant staff. Emergency preparedness shall form part of the Environmental Awareness and Induction Training (Section 3.6).	Y	4	The emergency preparedness procedure dated 13/01/2023 was submitted. The plan covers the requirements of the condition. Inductions were undertaken on site.
The Contractor shall determine appropriate procedures in the event of an emergency (e.g. medical emergencies, runaway fires, environmental incidents, site evacuation and staff assembly), and shall submit a Method Statement to the Contract Manager and ECO for approval of the proposed procedures.	Y	4	The emergency preparedness procedure dated 13/01/2023 was submitted. Emergency drills were conducted ad hoc, e.g. Identifying and congregating at the assembly point in case of fire, etc. Contractors also did medicals emergency drills to also try and estimate time taken by the ambulance to reach various parts of the wind farm cluster. The method statements were submitted to the ECO.
The following contact details shall be clearly displayed at the contractor's camp near a telephone, and provided to relevant staff: • Emergency contact details for the local hospital, fire brigade, and police department. • A list of contact details for the ECO, Contract Manager and relevant authorities. • Contact details for the heritage authority (ECPHRA) (in the event that a heritage discovery is made).	N/A	N/A	All contractors camps were located at the Impofu West Wind Farm. The ECO reports have indicated that emergency contact lists were clearly displayed at the contractor's camps and were updated regularly.
First Aid Kits are to be strategically placed at the site office / camp, laydown areas, and on site where required. All staff are to be made aware of their locations and purposes and trained in their basic use.	Y	4	First aid kits were visibly placed.
Material Safety Data Sheets (MSDSs) shall be readily available on site for all chemicals and hazardous substances housed or used on site. Where possible and available, MSDSs should additionally include information on ecological impacts and measures to minimise negative environmental impacts during accidental releases or escapes.	Y	4	Contractors kept a soft copy of the MSDS's
Evacuation Plans shall: • Be appropriately displayed at the Contractor's camp/s showing evacuation routes and assembly points. • Be communicated to all staff as part of the Environmental Awareness and Induction Training. • Include for the contingency plans to evacuate severely injured staff to designated medical facilities.	Y	4	Emergency drills were conducted ad hoc, e.g. Identifying and congregating at the assembly point in case of fire, etc.
Fire preparedness			
Fire extinguishers and fire-fighting equipment (in terms of the OHSA) are to be strategically placed at the site office / camp, laydown areas, and on site where required. All staff are to be made aware of their locations and purposes and trained in their basic use.	Y	4	All working teams on site had fire extinguishers that were visibly placed (next to the smoking area). At the laydown and site camps, they were available next to hazardous substance storage area. Signage showing placement of fire extinguisher was placed at the site camps and for teams on site.
Smoking shall not be permitted in those areas where it is a fire hazard. Such areas shall include fuel storage and refuelling areas, vegetation stockpile areas	Y	4	Signage prohibiting smoking in areas where it is a fire hazard was placed next to the diesel tanks, HCS storage areas, etc. Smoking zones were communicated to teams on site



and any other areas where the vegetation (e.g. fynbos) or other materials are susceptible to the start and rapid spread of fire.			
A Fire Officer shall be nominated (the ESO may fulfil this role) to be responsible for developing immediate and appropriate actions in the event of a fire and shall ensure that employees are aware of the procedure to be followed. In the event of a fire, site staff shall first try to contain the fire without posing unnecessary risks to themselves. As soon as it looks as if the fire may get out of control, appropriate emergency personnel shall be dispatched.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Contractor's camp and laydown areas			
These measures will ensure that impacts to the environment and neighbouring land uses are minimized during site establishment:			Information Iten
The Contractor shall determine appropriate locations for the contractor's camp/s and laydown areas for the portion of work in progress and shall submit a Method Statement to the Contract Manager and ECO for approval of the proposed locations and layouts. • The location and layout shall be such that visual, dust and noise impacts on sensitive receptors such as adjacent residents / businesses / activities are minimized as far as possible. • These shall be located within the development sites, approved areas or authorised corridors wherever possible, and may not be situated on sensitive areas identified in the environmental assessment or specialist walkthrough exercise. • Wherever possible, these shall be located on previously disturbed areas.	N/A	N/A	All contractors camps were located at Impofu West Wind Farm. The method statement titled "02 SITE CAMP ESTABLISHMENT" dated 13 January 2026 was compiled to fulfil this condition. The method statement was submitted to the contract manager and ECO.
The main contractor's camp layout shall make provision for (where applicable): • Access off the road network and visitor / staff parking facilities. • Site office facilities and a structure to shelter security staff. • Ablution facilities and a potable water source. • Designated cooking areas. • Hazardous material / chemical storage and fuel storage. • Equipment cleaning areas. • Waste storage and wastewater management. • Plant parking facilities and a vehicle refuelling/maintenance area/s. • Emergency equipment storage areas including fire extinguishers and first aid kits. • Laydown areas, batching plant and materials storage. • Security fencing.	N/A	N/A	Contractors camp was designed in accordance to the requirements. It should be noted that all contractors camps were located at the Impofu West Wind Farm.
The facilities that require slabbed or bunded surfaces are to be designed to engineering standards of sufficient capacity.	N/A	N/A	All contractors camps were located at Impofu West Wind Farm. The 23 000L Diesel tanks and HCS storage areas were bunded. Workshop area and wash bay were also slabbed.
The disturbance to topsoil shall be minimised, and compaction or removal of topsoil shall be restricted wherever possible (e.g. access routes and parking areas, and activity areas).	Y	4	There was no unnecessary removal/disturbance of topsoil noted on site. Topsoil that was removed during site establishment was windrowed next to where it was removed.



Any additional telephone lines, electricity lines, sewer and / or water supply networks are to be approved by the relevant authorities prior to installation if so required by law, even if temporary.	Y	4	All necessary water use authorisations were obtained for water supply and waste water. No further additional infrastructure required approvals.
Paved / hardened or dedicated (marked) pathways are to be provided between office facilities / security facilities, high pedestrian and vehicle traffic areas (such as parking areas) to reduce soil erosion.	Y	4	Crushed yard stone was placed between office facilities at the site camps. To reduce dust and erosion.
Should lights be installed at the contractor's camp for security purposes, then: • Any security lighting installed shall not cause a reasonably avoidable disturbance to other users of the surrounding area. • Lighting shall meet the requirements to mitigate impacts to bats as set out in the environmental sensitivities for pre-construction. • Lighting installed shall, as far as practically possible, be energy efficient and angled downwards. • Lighting shall be turned off when not in use or fitted with movement sensors (where lights only come on when required) or similar.	Y	4	lights installed in accordance with the requirements. A lighting engineer was appointed to design the lights layout for the site.
Potable water shall be provided for drinking purposes at the main Contractor's camp. Should a potable water supply / container be provided, then: • It is to be animal and weather proof and sealed / fenced to prevent potential contamination / drowning.	N/A	N/A	All contractors camps were located at the Impofu West Wind Farm. Bottled water was used for drinking purposes at the office site camp, and a Jojo tanked linked to the permitted borehole was used other employees to refill bottles.
All cooking shall be done in a designated area of the contractor's camp (preferably on well-maintained gas cookers) with fire extinguishers present.	N/A	N/A	All contractors camps were located at the Impofu West Wind Farm.
Temporary fencing shall be installed around the Contractor's camps and designated laydown areas (as required by Contract) with appropriate gates and signage to prevent unauthorised access by the public.	N/A	N/A	All contractors camps were located at the Impofu West Wind Farm.
The movement of construction workers on and off the site should be closely managed and monitored.	NV	NV	Not verified. There was no indication the measures implemented to fulfil this requirement.
Ablution facilities			
These measures will ensure the appropriate maintenance and management of ablution facilities to prevent pollution of the environment, including ground and surface water:			Information item
The Contractor shall submit a Method Statement for Ablution Facilities, which shall address washing facilities (including methods for managing grey water) and toilets (including the number of, location and method of securing portable/chemical toilets to the ground (if not trailer versions), the proposed service providers and their service schedule). • A sufficient number of toilets shall be provided for the site staff at a ratio of not less than 1 toilet per 15 people. • Toilet facilities shall be located within the contractor's camp and at work areas remote from the camp.	Y	4	Method statement submitted in accordance to condition.



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 of ablution waste from toilets) is strictly prohibited.	Y	4	Mobile toilets that had anchors fitted travelled with each team on site. They we also secured using stop blocks. The toilets had servicing dates displayed on the them. No concerns were raised in relation to ablution.
Long drops are forbidden. Septic tank systems (if required) are to be designed by qualified professionals and built to specification and include any requirements of a Water Use Authorisation, if applicable.	Y	4	No long drops were constructed on site. Section 21(g) water use GA approved for conservancy tank that was used by one of the contractors.
Any staff wash-up areas or bathing facilities are to drain into the municipal drainage system / septic tank system, or alternative arrangements are to be made for the collection and disposal of runoff from these areas at a suitable facility.	N/A	N/A	No long drops were constructed on site. S21g approved for conservancy tank that was used by one of the contractors. No connection to municipal infrastructure was used in this regard.
Protection of public infrastructure and services			
These measures will limit and consolidate the impacts of the construction activities on existing infrastructure and services:			
Should there be plans to affect any public infrastructure, services or servitudes during the construction, then the Contractor shall contact the relevant service authorities to obtain agreement on proposed action.	NV	NV	Not verified. Evidence of implementation was not submitted as part of audit documentation.
Any restrictions that are placed on the construction activities or choice of plant when working under or in close proximity to public infrastructure or service servitudes as set by the relevant service authorities shall be adhered to, and measures to protect such infrastructure and services shall be implemented.	NV	NV	Not verified. Evidence of implementation was not submitted as part of audit documentation.
Should such public infrastructure or services be damaged in any way, the owner of the infrastructure or the custodian of the service shall be notified and the damage satisfactorily repaired.	NV	NV	Not verified. Evidence of implementation was not submitted as part of audit documentation.
The Contractor shall notify affected parties (e.g. affected adjacent landowners, relevant service providers and/or the affected community) of any planned disruptions to water, electricity, road thoroughfare, or telecommunications.	Y	4	Disruptions that may interfere with landowner operations were communicated in a WhatsApp group and sometimes verbally. Such interruptions were mostly affected road throughfare during keystone deliveries.
In the event of accidental disruptions, the Contractor shall endeavour to advise the affected parties of when the problem is likely to be resolved.	Y	4	Disruptions that may interfere with landowner operations were communicated in a WhatsApp group and sometimes verbally. Such interruptions were mostly affected road throughfare during keystone deliveries.



Heritage resource protection			
These measures will prevent impacts to objects of historical significance or heritage value:			Information item
The Contractor shall ensure that the Proponent has obtained the requisite permits to destroy/remove any known heritage resources that cannot be conserved prior to any disturbance, damage, destruction, alteration or demolition activities being executed.	Y	4	Known heritage resources were barricaded. The cultural heritage chance find procedure that was developed for the wind farm, permits for removal would be gathered by the ECO after the archaeologist has assessed the find. There was no removal of known heritage resources during the construction phase, only accidental ground-disturbing activities.
New Discoveries			
Should a new discovery of possible heritage significance (archaeological sites or remains e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, charcoal and ask concentration, fossils e.g. vertebrate bones and teeth, or petrified logs of fossil wood; or other categories of heritage resources) be made, then: All works within the vicinity of any discovery of potential heritage significance shall cease immediately, and the area shall be cordoned off until the necessary remedial steps have been implemented and authorisation has been obtained to resume activities. • The ECO and the relevant heritage authority (SAHRA and/or ECPHRA) shall be notified immediately, and arrangements made for the discovery to be examined by an appropriate heritage specialist. The requisite actions emanating from the advice of the heritage authority and specialist shall then be implemented. • Develop a Chance Find Procedure. Reasonable precautions shall be taken to prevent any person from removing or damaging any discovered fossils, coins, articles of value or antiquity, structures and other remains of archaeological/ palaeontological/ historical interest discovered within the site.	N/A	N/A	No new discoveries were made during construction.
If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA/ECPHRA.	N/A	N/A	No new discoveries were made during construction
The palaeontologist concerned with any mitigation work will need a valid fossil collection permit from the ECPHRA and any material collected would have to be curated in an approved depository (e.g. museum or university collection). All palaeontological specialist work would have to conform to international best practice for palaeontological fieldwork and the study (e.g. data recording fossil collection and curation, final report) should adhere as far as possible to the minimum standards for Phase 2 palaeontological studies developed by SAHRA (2013).	N/A	N/A	No new discoveries were made during construction
Graves/Human Remains			



Should a new discovery of human remains/grave be made, then: • All works within the vicinity of the human remains/grave shall cease immediately, and the area shall be cordoned off until the necessary remedial steps have been implemented and authorisation has been obtained to resume activities. • The find may fall into the domain of SAHRA and would need to be reported to them, and will require inspection by a professional archaeologist to undertake mitigation, if needed. • The ECO and the Police shall be notified, and arrangements made for the discovery to be examined by an appropriate specialist. The requisite actions emanating from the advice of the Police and specialist shall then be implemented. • Graves and burial grounds are the property of the state and may require excavation and curation in an approved institution. Any work associated with the find will also be at the cost of the developer.	N/A	N/A	No new heritage features were identified during construction.
Any disturbance to a human burial older than 60 years will require a permit in terms of Section 36 (3)(a).	N/A	N/A	No new heritage features were identified during construction.
Habitat resource protection			
These measures will limit impacts on the natural habitats for fauna and flora:			
Any animal (mammal, reptile, amphibian, bird, insect or fish) found to be trapped within the site or in distress as a result of the site activities shall be appropriately relocated to a suitable site under the guidance of the ECO, relevant specialist if required or relevant authorities.	N/A	N/A	It was stated that no animals that were in distress as result of the site activities. However, it was also confirmed that there were trained snake catchers who, when snaked were identified would capture and safely release the snakes away for the active sites.
Habitats and terrestrial or aquatic environments shall not be unnecessarily disturbed or damaged, unless as indicated in the approved development design. Any unauthorised disturbance or damage to habitats, or pollution of aquatic resources by anyone involved in the project shall be subject to reinstatement or rehabilitation to the culprit's cost.	Y	4	No unnecessary disturbance of habitats or environments were noted.
Care shall be exercised during all phases of the work to prevent sediment, debris or pollutants from entering any watercourses or waterbodies.	N	2	V-drains were heavily silted at the time of the audit throughout the wind farm.
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.	Y	4	The spill response and pollution prevention plan covers the use of pumps for dewatering activities. Dewatering was noted during the day of the audit, where no settling pond was used, however, the water was released onto a grassed field allowing for desilting.
Alien invasive plant species shall be controlled for the duration of the site activities, and for a stipulated period following rehabilitation. • Care must be taken to avoid the introduction of alien plant species to the site and surrounding areas.	N	2	Alien vegetation was noted in numerous areas on site. It is suggested that alien invasives are removed from site on a continual basis.



• Alien vegetation encroachment onto the site and from the site shall be controlled and prevented.			
Vegetation clearance			
These measures will limit the extent of any environmental impacts and minimise unnecessary remediation:			
Indigenous vegetation on the approved construction site that does not interfere with the construction activities shall be left undisturbed.	Y	4	There was no unnecessary removal of indigenous vegetation during site clearance and establishment.
Damage shall not be caused to sensitive environmental features outside of the demarcated construction areas, including marked and barricaded heritage resources, protected trees, structures and infrastructure.	N	2	The Eastern Cape Provincial heritage Resources Authority (ECPHRA) received a formal heritage crime on the 19th of May 2025 for ground-disturbing activities i.e. excavations, that occurred without adequate archaeological monitoring. The developer reported that this was due to miscommunication and construction programme changes. This was subsequently resolved.
Site clearing shall not commence until any required recovery exercises aimed at rescuing and relocating protected plant species has been undertaken by the specialists on the area earmarked for clearing.	Y	4	Search and rescue activities began in August 2023 through September 2023, and establishment of Power Construction's site camp commenced 31 October 2023.
Vegetation clearing shall be kept to that which is absolutely essential, within the footprints of the servitudes, laydown areas, Contractor's camp/s and access roads wherever possible.	Y	4	There was no additional vegetation clearing in areas not earmarked for clearing.
Where possible, areas of phased construction shall be cleared, developed and rehabilitated prior to moving to the next. Soil should be exposed for the minimum time possible once cleared, such that the timing of clearance is coordinated with the onset of construction. This will prevent wind and water erosion.	Y	4	No concerns raised during the audit with respect to scheduling of construction activities.
Vegetation to be cleared along steep banks should only be removed at the onset of the construction of that area, or immediately prior to landscaping, to reduce soil erosion to the site.	Y	4	No concerns raised with respect to vegetation clearing.
The clearance of vegetation for a trace line during stringing activities shall be undertaken in accordance with Section 0.	N/A	N/A	Not applicable to current audit as the reference was noted to be incorrect. Furthermore, the condition pertains to the overhead powerline which was out of the scope of this audit.
Watercourses and drainage lines shall be kept free of felled trees or vegetation cuttings and debris. The integrity of riverbanks shall be maintained wherever possible by leaving the soil and roots undisturbed by clearing activities (i.e.. trimming or slashing/cutting rather than total vegetation removal).	Y	4	No felled trees/vegetation noted at riverbanks.
The disposal of vegetation by burying or burning is prohibited in terms of national legislation.	Y	4	No burning or burying of vegetation was noted during construction.
Cleared vegetation that is not appropriate for shredding/mulching/chipping, and/or reuse on site shall be disposed of at licensed municipal garden refuse sites.	NV	NV	Not verified. Safe disposal slips for general waste did not specify the different waste types/material of waste. It was however stated that the condition had been complied to.
Hazardous substances and hydrocarbon management			



These measures will manage the risk of hydrocarbon leaks and spills as well as the associated risk of pollution:			Information item
The Contractor shall submit a Method Statement to the Contract Manager and ECO detailing the Hazardous Chemical Substances (as defined in the Regulations for Hazardous Chemical Substances in GN 1179 (25 August 1995)), hydrocarbon substances or dangerous goods to be used, together with the storage, handling and disposal procedures of the materials.	Y	4	The Method statement "Hazardous chemical substances" was submitted and covers the required items.
Hazardous Chemical Substances and dangerous goods			
The relevant Material Safety Data Sheets (MSDSs) for all Hazardous Chemical Substances on site shall be readily available. Procedures detailed in the MSDSs shall be followed in the event of an emergency situation.	Y	4	Contractors kept a soft copy of the MSDS's
If potentially Hazardous Chemical Substances are to be stored on site, then:• Hazardous Chemical Substances shall be stored in appropriate containers which are clearlylabelled and sealed.• 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.	Y	4	HCS containers were stored on an impermeable surface. All HCS storage areas had warning/safety signage
All staff working with Hazardous Chemical Substances shall be trained in the safe use of the substance in accordance with the MSDS.	Y	4	It was indicated that the turbine contractor undertook an oil spill drill with their staff. Furthermore, continuous toolbox talks were undertaken. A sample of the Toolbox talks was submitted to the auditor.
Hydrocarbons			
All necessary approvals with respect to fuel storage and dispensing shall be obtained from the appropriate authorities.	Y	4	The contractor (Power Construction) holds a flammable liquid storage certificate.
Should fuel (petrol and diesel) be stored on-site, then fuel storage areas within the contractor's camp shall be identified and designated to this purpose: • The designated area shall be located in a portion of the site where it is unlikely to pose a significant risk in terms of water pollution or traffic safety. • Warning/safety signage conforming to the requirement of SANS 1186 shall be prominently displayed in and around the fuel storage area.	N/A	N/A	All contractors camps were located at the Impofu West Wind Farm. Fuel was stored within bunded areas of the site camps (and temporary laydown areas), with the appropriate safety signage clearly displayed.
Fuel storage management shall ensure limited risk to the environment: • All liquid fuels and oils shall be stored in tanks with lids, which are kept firmly shut and adequately secured. The capacity of the tank shall be clearly displayed,	N/A	N/A	This condition has been scored as not-applicable to this specific EMPr as the contactors camp is located at the West Wind Farm. East substation did have a bund at the laydown area during construction.



and the product contained within the tank clearly identified using the emergency information system detailed in SANS 0232 part 1. • Fuel storage tanks shall have a capacity not exceeding 50 000 litres and shall be kept on site only for as long as fuel is needed for construction activities, on completion of which they shall be removed. • The fuel storage tanks will be within the site camp area which is of low environmental significance9. • Fuel shall be stored in drums or bowsers 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). • Only empty externally clean drums may be stored on the bare ground. Empty and externally dirty tanks shall be sealed and stored on an area where the ground has been made impermeable. • There shall be adequate fire-fighting equipment at the fuel storage area. • Rainwater that collects in bunded areas shall be promptly removed and dealt with as water containing waste.			
Should regular refuelling on site be necessary, then provision shall be made for a dedicated refuelling station at the fuel storage area: • The impermeable, bunded fuel storage area shall also accommodate refuelling activities. • The proper dispensing equipment shall be used, and the drum shall not be tipped in order to dispense fuel. • The dispensing mechanism of the fuel storage drum shall be stored in a waterproof container when not in use. • A supply of absorbent material (e.g. Spill Sorb or Enretech #1 powder or equivalent) shall be readily available to absorb, break down and encapsulate minor hydrocarbon spillage. The quantity of such material shall be able to handle a minimum of 200 litres of hydrocarbon liquid spill per incident • There shall be adequate fire-fighting equipment at the refuelling area.	Y	4	Although no storage of fuel occurred at the East EMPr, refuelling was undertaken by a mobile bowser utilising drip trays to contain spills. Spill kits were also available on site.
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.	Y	4	Although no storage of fuel occurred at the East EMPr, refuelling was undertaken by a mobile bowser utilising drip trays to contain spills. Spill kits were also available on site.
Pollutants, or water contaminated with any pollutants (e.g. detergent, cement, fuels and oils) shall be disposed of in accordance with Section 0.	Y	4	Contaminated water was stored in 250 L drums and would be disposed as hazardous waste.
Bitumen			
Bitumen drums/products, if stored on site, shall be stored with an appropriate base, bunding and sump.	N/A	N/A	Not applicable to current audit. No bitumen was used on site.



Rainwater that collects in bunded areas shall be promptly removed and dealt with as water containing waste.	N/A	N/A	Not applicable to current audit. No bitumen was used on site.
When heating bitumen products, the cognisance shall be taken of appropriate fire risk controls.	N/A	N/A	Not applicable to current audit. No bitumen was used on site.
Spills			
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.	Y	4	Complied. Method statement was made available.
Cement and batching plants			
These measures will ensure the appropriate management of materials to reduce pollution to the environment:			Information item
Concrete mixing shall be carried out on an impermeable hardened surface (e.g. boards, or a designated bunded area with an impermeable surface).	Y	4	Concrete mixing was undertaken on mixing trays or supplied by a concrete mixer truck.
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.	Y	4	No concerns raised with respect to spillage of cement. Cement was stored appropriately on wooden pallets on top of a plastic/tarpaulin.
A washout facility utilising shall be provided for washing concrete mixing equipment, should cement mixing be required.	NV	NV	Not verified. There were no designated washout facilities for washing concrete mixing equipment.
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.	Y	4	Cement was stored appropriately on wooden pallets on top of a plastic/tarpaulin.
Hardened concrete from the concrete mixer or washout facility shall be reused or disposed of as builder's rubble at an appropriately licensed spoil facility.	Y	4	Hardened concrete was disposes licensed borrow pit as rubble waste.
Where 'readymix' concrete is used, delivery vehicle shall not wash chutes onsite, unless at a designated area where such water can be collected and disposed of as water containing waste. Similarly drum wash shall not be	Y	4	No washing of chutes on site.



disposed of onsite unless into a contaminated water pond/facility. Any spillage from 'readymix' delivery shall be immediately collected and disposed of as builder's waste as per 5.2.10.5 above			
Material and stockpile management			
These measures will consolidate areas of impact, preserve stockpiled material and ensure the appropriate management of materials to reduce pollution to the environment:			Information item
Materials in transit			
Delivery drivers shall be informed of all delivery procedures and restrictions (including "no go" areas) and shall be supervised during offloading by someone with an adequate understanding of the relevant requirements of the EMPr.	Y	4	No concerns raised with respect to deliveries.
Materials in transit shall be appropriately secured to ensure safe passage between destinations: • 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.	Y	4	No concerns raised with respect to securing of loads being transported.
All manufactured and or imported materials shall, where reasonably possible, be stored within the contractor's camp and designated laydown areas and, where required, out of the rain.	Y	4	All large materials were stored within designated laydown areas, and out of rain where possible.
Stockpile management			
Stockpiling areas shall be located close to the working area(s) to minimise disturbance to the environment and to avoid modification of drainage patterns. Method Statements are required for the location and method of protection of stockpiled materials stored outside of the contractor's camp or designated laydown areas, together with the proposed method of rehabilitating these areas.	Y	4	Stockpiles were located in areas that were close to working areas. Topsoil was windrowed next to site camps and laydown areas. Topsoil removed from the turbine areas would be stored in a designated area per property.
Care shall be taken to ensure that the location of stockpiling areas will not cause damming of water or runoff, nor expose the stockpiled material to extreme erosive elements.	Y	4	Stockpiles were monitored regularly and they did not display any signs of extreme erosion.
Stockpiles shall not be placed in a manner that obstructs vehicle visibility or drivers' line of site, especially when working near traffic intersections and sharp corners.	Y	4	No stockpiles were placed near roads obstructing views.
Stockpiled material (e.g. topsoil, soil, subsoil, and rocky material) shall be stable and well secured to avoid collapse and possible injury to site workers. Where required, appropriate precautions shall be taken to limit the erosion and compaction of stockpiles: • Stockpiled material shall not exceed 2 m in height (note: stockpiled topsoil shall be restricted to 1.5 m in height to prevent compaction).	Y	4	No concerns raised regarding stockpiles.



• Stockpiled material shall be placed to occupy the minimum width compatible with the natural angle of repose of the material (simple dimensions to be provided by the ECO), and measures shall be taken to prevent the material from being spread over too wide a surface. • The stockpiles and stockpile areas shall be carefully managed to prevent cross-contamination of stockpile material and to guard against "stockpile creep" (topsoil stockpiles shall be clearly demarcated & be distinguishable from other material stockpiles). • Stockpiled material shall be kept clear of weeds and alien invasive vegetation growth by regular weeding, or herbicides if permitted (restrictions on herbicide use for topsoil stockpiles is to the discretion of the ECO). • If the stockpiles start to erode significantly or cause dust problems, they shall be covered with suitable erosion protection materials (e.g. hessian or geo-fabric).			
Every effort shall be made to handle topsoil twice only: once to strip and stockpile, and once to replace, level, shape and scarify.	Y	4	Effort was made to adhere to this as far as practicably possible. However, changes in designs perhaps, having to fix or rework an area multiple times necessitated disturbance of topsoil/handling more than once.
Topsoil stripped from different sites of different soil types shall be stockpiled separately and clearly identified as such for return to area of origin, and every effort shall be made to prevent the mixing of topsoil from different sites of different soil types.	Y	4	Complied. No mixing of topsoil reported/recorded.
Where practical, stockpiled topsoil shall not be left for more than two to four months before being used for rehabilitation, as longer storage will compromise its fertility. When topsoil must be stored for extended periods of time, topsoil stockpiles shall be protected from erosive forces using a suitable cover: • Stockpiled topsoil could be vegetated to reduce the potential for erosion and deterioration in soil quality. Appropriate ground cover could be planted on topsoil stockpiles to prevent surface damage, maintain active populations of beneficial soil microbes, prevent weed infestation and control erosion. • Where wind and water erosion are a particular problem, stockpiled topsoil could be covered in erosion protection materials (e.g. hessian or geo-fabric or similar). • Stockpiled topsoil shall not be covered with any material (e.g. plastic) that may kill seeds or cause it to compost.	Y	4	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
To ensure continued biological activity within topsoil stockpiles, stockpiled topsoil shall not exceed 1.5 m in height and shall not be compacted in any way.	Y	4	It was stated that topsoil stockpiles do not exceed 1.5m in height and they were not compacted. The growth of healthy grass indicated some biological activity.
Vehicle/plant and equipment management			
These measures will ensure that soil, surface water and groundwater contamination are minimized:			Information item



All employees must be given the necessary safety ear protection gear when utilising noise generating equipment or plant. In this regard, the employer is required by law to provide the necessary equipment (i.e.. ear protection).	Y	4	All employees were given ear protection. The safety and environmental officers made sure that full PPE was work at all times.
All plant shall be stored within the designated secure area of the contractor's camp, or a secure area equivalent approved by the ECO, when not in use.	N/A	N/A	All contractors camps were located at the Impofu West Wind Farm. The plant were parked in together in the contractors camp at West WF, and alternatively at the substation laydown.
All vehicle / plant shall be maintained in good working order, shall adhere to the relevant lighting & noise requirements of the Road Traffic Act (93 of 1996) and SANS 1200A Clause 4.1, and vehicle service histories are to be kept up to date to reduce potential noise and air pollution from vehicle emissions: • All vehicles shall be equipped with an appropriate silencer on their exhaust systems. • Mechanical equipment with lower sound power levels shall be selected wherever possible. • Safety measures that generate noise, such as reverse gear alarms on large vehicles, shall be appropriately calibrated or adjusted to minimise noise. • Appropriate directional and intensity settings shall be applied on all hooters and sirens.	Y	4	Construction vehicles and machinery were equipped with silencers. No concerns raised with respect to air pollution/traffic act compliance.
Where possible and practical the maintenance of all vehicles and equipment shall take place in a designated bunded area of the contractor's camp on a sloping hardened surface with a suitable collection sump or suitable oil/water separator. • The vicinity of such areas shall be monitored for fuel and oil spills, and these shall be promptly addressed. • Rainwater that collects in bunded areas shall be promptly removed and dealt with as water containing waste in Section 0.	Y	4	There was a designated workshop area on concrete slab at West WF (Power Construction's).
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).	Y	4	Drip trays provided for standing plant.
Vehicles / plant shall not park along the roadside in such a way that they obscure visibility to road users or anyone wishing to leave or enter the contractor's camp or development sites.	Y	4	No concerns raised.
Spoil and trench management			
These measures will facilitate appropriate management and use/disposal of spoil material to prevent environmental degradation and dumping:			
Inert spoil material (material obtained from site that cannot be engineered into the site design as fill or overburden) can be used in the rehabilitation process, either to aid in the final finishing of the site or in providing subsoil cover over which the stockpiled topsoil can be spread.	Y	4	Excess subsoil and/or spoil material was disposed at the approved borrow pit outside.



To consolidate impacts, all spoil material intended for rehabilitation shall be stockpiled within the designated stockpile areas prior to its spoiling or use in rehabilitation.	Y	4	Excess subsoil and/or spoil material was disposed at the approved borrow pit outside. Spoil to be used during rehab was kept in the stockpile area on site.
Any surplus inert spoil that cannot be used elsewhere on site, or for other third party (private/municipal/provincial) purposes, shall be permanently disposed of as builder's rubble at an appropriately licensed facility.	Y	4	Excess subsoil and/or spoil material was disposed at the approved borrow pit outside.
All trenching activities are to comply with the relevant safety requirements, and unless otherwise stated by the Contract, shall have shoring if the excavations are greater than 1.2 m in depth.	Y	4	No trenches remained open/were noted during the time of the audit. It was reported that the safety officers of all contractors and the client inspected trenches and any safety hazards that may be associated with those works. The designated safety officers supervised safe works within and around open trenches. Toolbox talks were also discussed regularly as a reminder.
In the event of temporary site closure or shut down, trenches are to be secured to prevent unauthorised access.	Y	4	No trenches remained open/were noted during the time of the audit. All active works were completed and there were no temporary trenched associated with this phase of the project. In the event of temporary site closure, the ECO and construction team completed checklists to ensure site was safety secured.
Open trenches, excavations and earthworks pose a hazard to both domestic livestock and wild animals: • Trenches shall be regularly inspected if they can be accessed by animals. • Domestic animals or livestock belonging to surrounding communities or landowners shall be kept away from the works, and in this regard appropriate stock-proof fencing may be required around excavations and earthworks.	Y	4	No trenches remained open/were noted during the time of the audit. All active works were completed and there were no temporary trenched associated with this phase of the project. The ECO reports indicated that trenches that were left overnight had a solid barricade to prevent animals from falling in.
Blasting and hotworks			
These measures will ensure that impact to the environment and neighbouring land uses are minimized through safe blasting and hotworks practices:			
Should it be necessary to undertake blasting activities, then adjacent landowners, nearby sensitive receptors, site personnel and the relevant emergency services shall be notified of the location, planned timing and duration of such activities, with sufficient warning to secure livestock/pets.	Y	4	Notification of blasting activities was sent to landowners nearby via the WhatsApp group (ref. blasting folder in compliance folder). A blasting permit was acquired from SAPS.
Blasting activities are to be conducted in accordance with the Explosives Act No. 15 of 2003, the Minerals act, Act No. 50 of 1991 and Regulation 4 of the Explosives Regulations of the Occupational Health and Safety Act No. 85 of 1993). Emergency procedures are to be adhered to.	Y	4	No concerns were raised relating to blasting.
Blasting activities shall be conducted by a suitably licensed blasting contractor.	Y	4	'ProFrag Drilling and Blasting (Pty) Ltd' was appointed as the professional blasting contractor.
Prior to any blasting, the Contractor is to document the status of nearby structures, infrastructure or buildings through photographs or video footage.	Y	4	Landowners were consulted prior to blasting. Emergency procedures were in place. No concerns raised with respect to blasting.
All reasonable measures shall be implemented to reduce the noise impacts associated with drilling and blasting to neighbouring residents, land uses, services or infrastructure.	Y	4	A blasting notice was issued to the construction team, surrounding landowners and general public. Procedures for clearing an area prior to blasting included having a an appointed competent Blaster position guards and danger signs at all entry points into



			the danger area. The guards were positioned where they would not be affected by excessive dust and fumes.
Staff shall wear dust masks during and immediately after any blasting activities (on confirmation with relevant HSE officer).	Y	4	Blasting notices detailed blasting procedures. The construction management team (including safety manager) had a pre-blasting meeting to ensure that proper PPE is worn at all times.
The Contractor shall ensure that construction related activities that pose a potential fire risk (e.g. hotworks such as welding and grinding) are properly managed and are confined to areas where the risk of fires has been reduced: **• Any activities that involve an open flame or pose a fire risk shall not occur without a fire extinguisher present.** **• Hotworks shall be avoided in high wind conditions, especially in the drier months.**	Y	4	Fire extinguishers were always readily available on site. It was further stated that safety officers cautioned all employees of risks associated with inclement weather conditions. This could not be verified during the time of this audit.
Waste management			
These measures will minimise waste generation and prevent pollution of the environment:			Information item
In terms of the National Environment Management: Air Quality Act, 39 of 2004, burning is not permitted as a disposal method.	N/A	N/A	No evidence burning of waste was done by the project developer and contractors on site. The condition was noted by the holder.
The Contractor shall submit a Method Statement to the Contract Manager and ECO detailing the type of waste anticipated; the storage, handling, reuse, recycling and/or disposal procedures proposed, together with the facilities proposed to receive such waste.	Y	4	Complied.
All certificates of disposal or records of handover to appropriately licensed facilities shall be retained, together with records of tonnages per month, and these shall be made available for monthly progress reporting if so required by the ECO, Contract or Contract Manager.	Y	4	Disposal certificates received. Furthermore, safe disposal slips for all waste removed from site was kept by the EO's and available to the ECO on request.
Designated facilities for builder's rubble, hazardous waste, and general waste as provided for in the Contractor's camp/s are to be used for the storage of the appropriate waste products that is weather proof and scavenger proof.	Y	4	No concerns raised with respect to the temporary storage of waste.
General Waste			
The quantities of general waste generated on-site shall be minimised wherever possible by reducing, reusing and/or recycling it. The nearest municipal/private recycling facilities are to be identified as possible options for receiving recyclable materials Separate receptacles for different types of recyclable/reusable materials are to be provided wherever possible.	Y	4	Waste storage is in line with the requirements of this condition. Reuse and recycling of waste takes place.
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.	Y	4	General waste is stored and removed from site in an appropriate manner.



All non-recyclable litter and refuse shall be disposed of off-site at a licensed landfill facility approved by the Contract Manager and ECO.			
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.	Y	4	No issues were noted with spreading of waste during the site inspection.
Builder's rubble shall be neatly stockpiled in designated stockpile areas, and shall regularly be removed from site to an appropriately licensed waste disposal facility or reuse/recycling facility approved by the Contract manager or ECO.	Y	4	No rubble was noted on site at the time of the audit. It was stated that rubble/spoil was disposed at a licensed borrow pit,.
Hazardous Waste			
Should the generation of hazardous waste be anticipated during the site activities, then suitable collection and storage facilities shall be planned, and an area of the Contractor's camp designated for this purpose in accordance with the relevant legislation. • Hazardous waste shall be stored in sealed and labelled drums, which shall be situated on a smooth impermeable surface (concrete or 250 micrometre (µm) plastic (plastic must have at least 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 waste storage areas shall be restricted, and the areas secured with requisite warning signage. • Rainwater that collects in bunded areas shall be promptly removed and dealt with as water containing waste.	Y	4	Hazardous waste is appropriately stored
Any hazardous waste or contaminated soil shall be disposed of (in accordance with legislation) at a licensed hazardous waste disposal facility, as approved by the Contract Manager and ECO. • Hazardous waste is to be contained and transported as required by the relevant legislation.	Y	4	Hazardous waste is appropriately disposed of.
Liquid waste (and water containing waste)			
Paint products, chemical additives and cleaners, such as thinners and turpentine, or water containing waste may not be disposed of into the stormwater system or elsewhere on site.	Y	4	Liquid wastes are appropriately stored and disposed of.
Should any liquid waste (e.g. spent oils, fuels and hazardous chemicals; cement-laden water or contaminated water from wash slab and repair areas, batching	Y	4	Liquid wastes are appropriately stored and disposed of.



areas, Hazardous Chemical Substance and hydrocarbon storage areas; water containing waste and domestic liquid waste) be generated then the liquid waste shall be stored in sealed and labelled drums or approved containers for such purposes in the designated hazardous waste area of the site until it is disposed of at appropriately licensed wastewater or hazardous waste disposal facilities as approved by the Contract Manager and ECO.			
Stormwater and sediment management			
These measures will manage contaminated water and prevent polluted runoff from entering watercourses or water bodies:			Information item
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 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.	N	2	Erosion has been noted on site.
It may be necessary to design specific protection measures that prevent the concentration of stormwater flows. These could include the construction of permanent or temporary drainage works which shall be designed to avoid scouring and erosion within the channel: • Bund (temporary): This constitutes a ridge of compacted material intended to divert overland sheet flow to a stabilised outlet or channel. • Cut-off drain (permanent): This constitutes a formal drainage structure to collect stormwater flow and channel into an appropriate discharge point. This shall be constructed on the uphill side of the bund and side drains shall be constructed to convey the flows to flat ground or into an appropriate watercourse. • Where flow velocities cannot be reduced to safe levels, consideration could be given to drainage structures that incorporate erosion resistant materials (e.g. rock). • Any relevant requirements stipulated by a Water Use Authorisation must also be implemented, if applicable.	Y	4	No concerns raised with respect to stormwater management.



Stormwater that has been loaded with suspended solids and silt during the construction phase can be released into watercourses provided all suspended solids have been removed from the water before it is discharged into the environment. • Sediment traps, sediment filters and settling out the solids in settlement ponds are possible solutions to preventing sediment from entering adjacent watercourses. • Installing porous barriers to collect silt can dramatically reduce sediment pollution on the opposite sides of the barrier. Applications vary depending on location of the barrier. Silt fences are commonly used as they are cost effective and readily available. They typically will be used as the primary silt collection tool and may be augmented with other sediment barriers. • Straw bales alone are not an acceptable sediment barrier. • All sediment barriers must be inspected and maintained during construction and restoration. • Any relevant requirements stipulated by a Water Use Authorisation must also be implemented, if applicable.	N	2	Although stormwater channels and sediment traps are in place heavy siltation of stormwater channels throughout the site was noted during the audit.
SITE ACCESS AND HAUL ROUTES			
Private properties			
These measures will ensure that use of private properties is done with consent and in an environmentally considerate manor:			
The use (access or occupation) of private properties outside of the approved development sites shall not occur without the Contractor proving that the affected landowner/ authorised representative has provided the Proponent with consent in writing.	N	2	No concerns raised. The contractor appointed for civil balance of plant did not submit the landowner consent for the concrete batching plant as it was outside the development footprint.
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.	Y	4	Landowner consultations were undertaken.
Access to the development sites, turbine locations and pylon positions shall make use of existing roads, gates and crossings wherever possible. Where this is not possible, then temporary access routes shall be located within the assessed and authorised area (by environmental assessment or specialist walkthrough) and shall require approval from the Contract Manager and ECO.	Y	4	Existing access roads were used as much as possible.
The location, proposed commencement and duration of construction activities planned on (or traversing) private land shall be communicated in writing to the affected landowners to minimise disturbance to their agricultural/other activities.	Y	4	Landowner consultations were undertaken.
Every effort shall be made to maintain existing access to private properties, and where this is not possible then suitable temporary access alternatives shall be	Y	4	Existing access points were used as much as possible.



determined in consultation with the landowner/authorised representative if so required.			
Fencing and gates			
These measures will ensure that fencing and gates are maintained/used/erected in a manor agreed to by the landowner:			
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.	Y	4	No concerns raised.
Where access to the site can only be achieved by installing a gate into existing fencing, approval from the Contract Manager and landowner shall be obtained: • Where gates are installed in specialized fencing (e.g. jackal-proof, game, electrified or security fencing), it must be ensured the gate retains the function of the original fencing, unless otherwise agreed with landowner/authorised representative. • Original tension shall be retained in the fence.	Y	4	No concerns were raised by the landowners. There were no gates installed in specialized fencing and there was no electrified installed except at the substations. All gates installed on site were consented by the landowners.
All demarcation fencing and barriers shall be maintained in good working order for the duration of their use.	N	2	Fencing in some areas needed to be repaired, for example the fenced off heritage borrow pit site at East Wind Farm.
Temporary fencing shall be removed on completion of works, and the uprights shall be removed completely (ensure uprights are not cut at ground level).	Y	4	All temporary fencing appears to have been removed from site
Access road management			
These measures will minimise impact to the environment through the planned and restricted movement of vehicles, and management of loads:			Information item
Should the existing private roads be used as haulage routes or access, their current status is to be defined by agreement prior to utilisation, such that the roads can be maintained in a condition as close as possible to their former status and reinstated after construction use. • Photographic record of the status of any private access roads shall be taken prior to use thereof and retained as a reference for reinstatement. • Cognisance of vehicle weight/dimensions shall be taken when using existing access roads constructed out of certain materials (e.g. paved surfaces/cobbled entranceways).	Y	4	Roads maintained by contactors.
Any new temporary access roads that are constructed: • On a slope shall have water diversion structures at regular intervals to reduce flow velocities and divert runoff back along the contour. • Shall be kept as narrow as possible.	Y	4	The Wind Farm consisted of existing roads to a large extant, and these were upgraded and maintained as required. Where new roads were constructed on a slope, stormwater management was according to the approved plan and water velocity dissipaters were installed.



Appropriate measures shall be implemented for the management of stormwater runoff and the control of erosion from the road surfaces of access roads: • To increase longevity, reduce dust and limit erosion, access roads that will be used for more than two years shall be well surfaced with durable materials of appropriate size, and surface cross-slopes shall facilitate good drainage. • The Contractor shall ensure that the access roads are maintained and are in good condition by attending to potholes, corrugations and stormwater damage as soon as these develop. • The Contractor shall ensure that all side and mitre drains and scour check walls on access roads are functioning properly and are well maintained. • Any relevant requirements stipulated by a Water Use Authorisation must also be implemented, if applicable.	N	2	Erosion across the Impofu East and North and West Wind Farm suggest its not under control, early onset gully erosion was observed at various areas, especially in the v-drains, side slopes of rehabilitated areas and along the roads.
Materials in transit shall be appropriately secured to ensure safe passage between destinations: • 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 (if the material being carted may cause dust or may easily fall out of the vehicles and pose a hazard to other road users). • The Contractor shall be responsible for any road clean up resulting from the failure by employees or suppliers to properly secure transported materials.	Y	4	No concerns raised with respect to securing of loads being transported.
Where road dust becomes a hazard to traffic safety or a nuisance to landowners or communities neighbouring the site, effective dust suppression options such as mulching or wetting shall be applied: • Non-potable water (of suitable quality and from a legal source) used for this purpose shall be used in quantities that will not result in runoff and erosion, or muddy areas (this would, however, need to be balanced against the wasteful use of water).	Y	4	No recent issues or complaints noted with respect to road dust. The water truck that was used for dust suppression sprayed the right amount of water so as to not waste water or cause muddying around site.
Vehicle wheel washing with non-potable water could be undertaken where necessary prior to leaving the site to reduce deposition of material on nearby roads. This would only really be appropriate where road traffic is high and where the amount of material carried onto public roads is significant. • Asphalt road access points near the development site shall be regularly swept free of dust.	N/A	N/A	No concerns raised.
Traffic management			
These measures will ensure that impacts to other road users are minimized:			Information item
Drivers by law must be licensed and shall be carefully briefed on the appropriate driving practices when operating on the development site.	Y	4	All contractors/drivers were compelled to adhere to health and safety practices and Traffic Act. A health and safety file was kept on site.
Reasonable speeds shall be maintained on the access roads in order to prevent accidents, excessive noise and unnecessary dust. Speed limits shall be enforced,	Y	4	Speed limit enforced on site.



and where a speed limit is not specified then speed shall depend on the type of vehicle, status of the road, and other traffic, but speeds between 20 and 40 km/h are typically regarded as acceptable.			
Predetermined detour routes are to be selected to reduce traffic disruptions to busy roads by abnormal loads, and such disruptions should be planned at off-peak times where ever possible.	Y	4	Appropriate abnormal load procedures, permits obtained and implemented.
Safety risks associated with the movement of heavily laden, slow moving haulage vehicles shall be effectively managed.	Y	4	Appropriate abnormal load procedures in place.
Entry/exit points onto public roads shall take cognisance of traffic safety.	Y	4	No concerns raised.
The use of signalmen shall be considered where relevant (e.g. for access onto highly trafficked roads, for roads with poor site distance, or where visibility is impaired).	Y	4	Road closures or anticipated disturbance to traffic flow which might impact certain work activities was communicated in advance with the landowners and the site teams.
SITE REINSTATEMENT, LANDSCAPING AND CLOSURE			
Removal of construction infrastructure			
These measures will minimise long-term disturbance or pollution to properties following closure:			
Removal of structures and infrastructure			
All construction plant, equipment, storage containers, temporary fencing, temporary services, and fixtures shall be completely removed from site.	N	2	At the time of the audit temporary construction equipment had been removed from site, except in a few areas where construction equipment was still spotted, for example cement bags at East 13.
All access roads utilised during construction which are outside of the servitude and not earmarked for use during the operational phase, shall be returned to a state no worse than prior to construction.	Y	4	The only remaining roads are those that were already present prior to construction commencing or roads required to be utilized during operations.
Inert waste and rubble			
Inert waste and rubble, including surplus rock, foundations, spoil and batching plant aggregates shall be removed and disposed of in accordance with Section 0. After the material has been removed, the site shall be re-instated and rehabilitated, in accordance with the approved Landscaping and Rehabilitation Plan.	Y	4	Rubble and waste rock as well as aggregates have been removed from the site. Rehabilitation and landscaping generally occurs in line with the requirements of the rehabilitation plan, although regrowth is slow in certain areas.
All domestic waste shall be removed from site and dispose of in accordance with Section 5.2.15.	Y	4	Domestic waste is removed on site on a regular basis and disposed of according to the requirements listed above.
Hazardous waste and pollution control			
All pollution containment structures shall be removed from site.	Y	4	No pollution containment structures remain on site
All temporary sanitary infrastructure and wastewater disposal systems shall be removed from site. Take care to avoid leaks, overflows and spills and dispose of any waste in the approved manner.	Y	4	Temporary sanitation infrastructure has been removed from site, except where it is required for guard houses which are still required as rehabilitation is ongoing.
Reinstatement			
These measures will ensure areas disturbed during the construction phase are returned to a state that approximates original condition, or allows for the natural reestablishment by suitable vegetation:			Information item



Landscaping			
Programme the backfill of excavations so that subsoil is deposited first, followed by the topsoil. Compact in layers for best results.	Y	4	Backfilling was done appropriately in line with this condition.
Monitor backfilled areas for subsidence (as the backfill settles) and fill depressions using available material.	Y	4	Ongoing monitoring of the site takes place. No areas of subsidence were noted during the audit.
Ensure that no excavated material or stockpiles are left on site and that all material remaining after backfill is landscaped or removed from site and disposed of at a suitably licensed waste disposal site.	Y	4	No excavated material or stockpiles noted at East Wind Farm
Topsoil replacement and soil amelioration			
Execute top soiling activity prior to the rainy season or any expected wet weather conditions.	Y	4	Topsoiling activities took place prior to the rainy season.
Execute topsoil placement only after all construction work has ceased.	Y	4	Topsoil placement took place after activities in that area ceased.
Replace and redistribute stockpiled topsoil together with herbaceous vegetation, overlying grass and other fine organic matter in all disturbed areas of the construction site, including temporary access routes. Replace topsoil to the original depth.	Y	4	The Contractor distributed topsoil that was windrowed around areas where it would be replaced. The soil was covered in healthy grass. Site inspection yielded no issues with respect to the redistribution of topsoil on the site.
Place topsoil in the same area from where it was stripped. If there is insufficient topsoil available from a particular soil zone to produce the minimum specified depth, topsoil of similar quality may be brought from other areas of similar quality. The suitability of substitute material will be determined by means of a soil analysis addressing soil fraction, fertility, pH and drainage.	NV	NV	This was not verified at the time of the audit as topsoil placement had been completed. That said no issues were noted with respect to the redistribution of topsoil on the site.
Do not use topsoil suspected to be contaminated with the seed of alien vegetation (e.g. black wattle). Alternatively, the soil is to be appropriately treated.	Y	4	No issues were noted with respect to alien vegetation in recently rehabilitated areas.
Ensure that stormwater run-off is not channelled alongside the gentle mounding, but that it is taken diagonally across it.	NV	NV	Not verified. The audit is limited to an evaluation of post-construction phase obligations only. Topsoil replacement had been completed at the time of the audit.
Shape remaining stockpiled topsoil not utilised elsewhere in an acceptable manner so as to blend in with the local surrounding area.	N/A	N/A	There were no remaining topsoil stockpiles are remaining on site during the audit. It was stated that during construction, the ECO advised on the best possible manner of stockpiling topsoil.
After topsoil placement is complete, spread available stripped vegetation randomly by hand over the topsoiled area.	Y	4	Cleared areas are revegetated as required.
Newly cleared soils will have to be re-vegetated and stabilised as soon as construction has been completed and there must be an on-going monitoring program to control and/or eradicate newly emerging alien invasive plants until site handover.	N	2	Cleared areas are revegetated and stabilized as required. Alien vegetation was noted in many areas of the site however.
Machines must remove the stone material and transport it to another location to be re-used if it is required, removed correctly to a licensed facility, or offered to the landowner.	Y	4	Spoil material disposed off at a licensed borrow pit.
If applicable, the geotextile base material, and other foreign material must also then removed during rehabilitation.	Y	4	Geotextiles were noted in certain areas where rehabilitation is still ongoing. In areas where rehabilitation is completed no issues were noted.



Ripping and scarifying			
Rip and / or scarify all areas following the application of topsoil to facilitate mixing of the upper most layers. Whether ripping and/or scarifying is necessary will be determined based on the site conditions immediately before these works begin.	N/A	N/A	Ripping and scarifying was not deemed necessary for rehabbed areas based on site conditions and adequate regrowth observations.
Rip and / or scarify all disturbed (and other specified) areas of the construction site, including temporary access routes and roads, compacted during the execution of the works.	N/A	N/A	Ripping and scarifying was not deemed necessary for rehabbed areas based on site conditions and adequate regrowth observations.
Rip and / or scarify along the contour to prevent the creation of down-slope channels.	N/A	N/A	Ripping and scarifying was not deemed necessary for rehabbed areas based on site conditions and adequate regrowth observations.
Do not rip and / or scarify areas under wet conditions, as the soil will not break up.	Y	4	No ripping or scarifying of wet areas took place
The area must be ripped to an appropriate depth (at least 300 mm) to remove any minor compaction.	N/A	N/A	Ripping and scarifying was not deemed necessary for rehabbed areas based on site conditions and adequate regrowth observations.
Revegetation			
These measures will ensure that any revegetation activities will promote rapid soil cover and indigenous growth:			Information item
Revegetation and maintenance shall occur as per the methods described and areas of the site identified in the Landscaping and Rehabilitation Plan.	N	2	Areas under rehabilitation are not cordoned off. Trampling of these areas is an ongoing issue as landowners want to use these areas for grazing. It is suggested that all rehabilitated areas where vegetation is struggling to grow are cordoned off to prevent trampling by cattle and allow full regrowth. Once rehabilitation is completed these areas can be opened up once again.
Temporary fencing or similar shall be considered on areas where livestock have free access, and choice of plant species could give preference to non-palatable species, if appropriate.	N	0	Areas under rehabilitation are not cordoned off. Trampling of these areas is an ongoing issue as landowners want to use these areas for grazing. It is suggested that all rehabilitated areas where vegetation is struggling to grow are cordoned off to prevent trampling by cattle and allow full regrowth. Once rehabilitation is completed these areas can be opened up once again.
Grassing			
The areas that have been denuded and disturbed as a result of the construction on site, and that will be revegetated, shall be revegetated as soon as possible, and preferably with indigenous vegetation.	Y	4	Areas are revegetated timeously with indigenous vegetation and grasses.
Suitably trained personnel shall undertake revegetation by making use of the recommended methods, appropriate equipment and specified grass species as determined by the Landscaping and Rehabilitation Plan. For best results: • Sodding may be done at any time of the year. • Seeding should be done during a season when the germination rate is better. • Hydroseeding is typically done where revegetation is urgent or where slopes are problematic and is more successful during a season when the growth rate is better.	Y	4	Revegetation is undertaken by suitably trained personnel using appropriate equipment and grass species.
Specifications for sods, runners and hand seeding shall be determined by the Landscaping and Rehabilitation Management Plan.	Y	4	Specifications are in line with the rehabilitation plan



Maintenance			
Monitor the re-growth of vegetative material, and address issues of erosion, trampling, and grazing accordingly.	N	2	Not all areas under rehabilitation are cordoned off. Trampling of these areas is an ongoing issue as landowners want to use these areas for grazing. It is suggested that all rehabilitated areas where vegetation is struggling to grow are cordoned off to prevent trampling by cattle and allow full regrowth. Once rehabilitation is completed these areas can be opened up once again.
Cordon off areas that are under rehabilitation as no-go areas.	N	2	Not all areas under rehabilitation are cordoned off. Trampling of these areas is an ongoing issue as landowners want to use these areas for grazing. It is suggested that all rehabilitated areas where vegetation is struggling to grow are cordoned off to prevent trampling by cattle and allow full regrowth. Once rehabilitation is completed these areas can be opened up once again.
Control invasive plant species and noxious weeds by means of extraction, cutting or other approved methods.	N	2	Alien vegetation was noted in numerous areas on site. It is suggested that alien invasives are removed from site on a continual basis.
For planted areas that have failed to establish, revegetate according to subsequent recommendations made by the terrestrial ecologist.	N	2	Revegetation and monitoring of certain areas will likely be required, for example where cattle have trampled over unfenced-off areas undergoing reinstatement .
OPERATION PHASE			
DISTRIBUTION OF ELECTRICITY			
Environmental sensitivities for operation			
These measures will ensure that the specialist requirements are implemented during the operational phase to minimize environmental impact:			Information item
Terrestrial Ecology			
Alien clearing and continued management in and around those parts of the development footprint that are within natural to near-natural vegetation to improve habitat quality of these areas and limit further degradation of the site from alien invasion.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
Aquatic Ecology			
Stormwater systems are to be inspected on an annual basis to ensure that the systems are functional.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
Bats			
Mitigation and monitoring as per the Bat Management Plan shall be implemented (for the duration specified) during the operational phase and shall be undertaken by a suitably qualified specialist. As soon as the Wind Farm becomes operational, a bat specialist must start to conduct a minimum of 2 years of operational bat mortality monitoring. The bat specialist must be appointed before commencement. Monitoring results must be used to develop specific mitigation to address problems identified during operations. Results of the operational monitoring must be made available, on request, to other bat specialists conducting operational and preconstruction monitoring on WEF's in South Africa	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.



Bi-annual visits to the facility at night must be conducted for the operational lifetime of the facility by operational staff to assess the lighting setup and whether the passive motion sensors are functioning correctly	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
The bat specialist conducting the operational bat mortality monitoring must conduct at least one visit to site during nighttime to assess the placement and setup of outside lights on the facility	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
The Bat Mitigation Action Plan must be consulted when lights are replaced and maintenance on lights is conducted	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
Curtailment must be applied to all turbines, every night between 1 September and 30 April, by ninety-degree feathering of blades below the manufacturer's cut-in speed, so it is exactly parallel to the wind direction and minimises freewheeling blade rotation as much as possible without locking the blades	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
If the acceptable annual mortality of bats (calculated at 53) is exceeded, then additional mitigation will need to be implemented to bring bat mortalities to or below the sustainable threshold. This could include curtailing problematic turbines according to the mitigation cut-in speed (refer to Section 2.3 of the bat micrositing report), and/or to utilise acoustic deterrents on problematic turbines	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
For the duration of the lifetime of the facility, the impacts on bats must be audited/monitored by reliable methods of carcass searching and/or electronic devices capable of automatically counting bat mortalities. Such auditing should occur every 5 years (after the end of the initial 2-year operational study) for all turbines on site.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
Avifauna			
Provision for a mitigation contingency budget for the operational phase should be made for the potential avifaunal impacts that may arise during operation. Update November 2022 – it is likely given the current state of knowledge in SA, that an Observer Led Shutdown On Demand programme would be the preferred mitigation measure if required	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
Dumping of livestock and/or game carcasses in uncovered pits creates a feeding site for raptors and other scavenging birds. Landowners should be requested to refrain from this practice once the wind farm is operational, or at a minimum to adequately cover these pits at all times to prevent birds from accessing the carrion	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
If Blue Crane turbine or power line collision fatalities occur as a result of livestock feeding points once the facility is operational, this will need to be mitigated, probably by restricting farmers from feeding too close to turbines (200-300 m) and power lines. or by covering/ obstructing the feeding points in some way that prevents the birds from easily feeding from them (as was done successfully with fence wires at an existing wind farm in the Overberg area for	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.



feeding points for sheep). Landowners should be made aware of this possibility at the outset of the project.			
Bird fatality searches must be prioritised at Turbines 28 and 29 and must be searched daily.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
Noise & Shadow Flicker			
Measurements shall be taken of the actual shadow-flicker impact at the identified sensitive receptors given the assessment used conservative assumptions and it is likely the actual impacts will be less than modelled. If exceedances have been detected, one or more of the following shall be implemented: • Blinds shall be installed in the affected windows and/or trees and evergreen vegetation (indigenous) shall be planted between the turbines and the affected windows. • If the above mitigation is shown to be ineffective, a shadow detection system shall be installed at the turbines to shut down during exceedances.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
Traffic			
Proponent to contribute to the maintenance of the public roads in the area during operation phases of the development.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
A photographic record of the road condition should be maintained throughout the operational phase of the development. This provides an objective assessment and mitigates any subjective view from road users.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
Transport Management Plan is to be revised for the operational phase of the development.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
Ensure all vehicles are roadworthy, visible, properly marked, and operated by an appropriate licenced operator.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
Socio-Economic			
The operator of the wind energy facility should be encouraged to, as far as possible, procure materials, goods and products required for the operation of the facility from local suppliers to increase the positive impact in the local economy.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
Where possible, local labour should be considered for employment so as to increase the positive impact on the local economy	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
As far as possible, local SMMEs should be approached to investigate the opportunities for supply inputs required for the maintenance and operation of the facility.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
Enterprise development and socio-economic development initiatives outlined in the REI4P bid must be effectively implemented: These plans should be reviewed on an annual basis and, where necessary, updated.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
When identifying enterprise development initiatives, the focus should be on creating sustainable and self-sufficient enterprises.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.



In devising the programmes to be implemented through these allocations, the developer should take into account the local Integrated Development Plans.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
Maintenance of Infrastructure			
These measures will ensure that maintenance activities are undertaken in a socially and environmentally considerate manor:			
Negotiate with landowners the timing of the maintenance activities within agricultural properties / land. • Suitable access arrangements to be made with landowners. • Safeguarding of livestock / game against maintenance activities (e.g. effective barricading of excavations). • Where relevant, air traffic (helicopter inspections) associated with the operation of the transmission line to take cognisance of aerial irrigation and spraying activities in agricultural areas.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
Regular inspection of infrastructure (substations, powerlines and roads) must take place to manage risks.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
Should new stringing be required, then these shall be fitted with BFDs (if originally required for the section in question or subsequently required following monitoring by the Avifaunal specialist).	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
All vehicle movements must be restricted to designated operational access or service roads, gates and crossings.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
Existing roads/track must be maintained to ensure limited erosion and impact on areas adjacent to roads. • Monitor culverts to see if any erosion control is required. Should any erosion features develop, they shall be stabilized as soon as possible. • Monitor stormwater management, specifically run-off control system. Should erosion occur downstream, the system will need to be maintained/ upgraded.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
The taller woody vegetation should only be cleared where this is necessary for operational safety of the transmission line. Taller succulent species such as tree euphorbias should be left in place as they do not pose a fire risk (as such species do not burn).	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
The standard construction specifications apply to all maintenance and repair work. • All maintenance works shall be undertaken in an environmentally responsible manner. • Any areas disturbed during maintenance shall be reinstated such that any disturbed areas are properly reshaped, top soiled and if needed, seeded with indigenous grass seed. • Maintenance and repairs involving earthworks or disturbance to the ground shall be implemented according to the relevant best practices cited in the specifications.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.



Broken infrastructure must be disassembled and removed off-site as soon as reasonably possible after breakdown.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Operation has not yet started.
DECOMMISSIONING PHASE			
LIFE-CYCLE CONCLUSION			
Environmental sensitivities for decommissioning			
These measures will ensure that the specialist requirements are implemented during the operational phase to minimize environmental impact:			
Terrestrial Ecology			
Regular monitoring of alien plants within the disturbed areas for at least two years after decommissioning or until alien invasive plants are no longer a problem at the site: • Regular Alien clearing should be conducted using best practice methods for species concerned.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Decommissioning has not started.
Any potentially dangerous fauna such as snakes threatened by the decommissioning activities should be removed to a safe location prior to commencement of decommissioning activities.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Decommissioning has not started.
To reduce the impacts to terrestrial ecology as a result of decommissioning: • Above-ground infrastructure should be removed from site. Below-ground infrastructure such as cabling can be left in place if it does not pose a risk, as removal of such cables may generate additional disturbance and impact, however, this should be in accordance with the facilities' decommissioning and recycling plan.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Decommissioning has not started.
Visual			
To reduce the visual impact of the decommissioned site: • Wind turbines shall be removed and building structures demolished or recycled for new uses. • Hardened platform areas and access roads no longer required, shall be ripped and regraded. • Exposed or disturbed areas shall be revegetated or returned to grazing pasture or natural vegetation to blend with the surroundings.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Decommissioning has not started.
Removal of infrastructure			
These measures will ensure that decommissioning is undertaken in a socially and environmentally considerate manor:			
All decommissioning activities must be restricted to the development footprint as far as possible. A pre-site investigation shall be undertaken to identify any sensitive areas that should be avoided.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Decommissioning has not started.
Procedures for the removal of infrastructure, buildings, pylons and substation structures during decommissioning are to be implemented according a decommissioning and recycling plan to a visually acceptable standard, and signed off by the delegated authority:	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Decommissioning has not started.



• Transmission line cables shall be removed, and substations shall be demolished or regentrified for an alternative purpose. • All above-ground infrastructure such as pylons shall be removed from the site. • Below-ground infrastructure such as cabling or pylon foundations can be left in place if it does not pose a risk, as removal of such infrastructure may generate additional environmental disturbance and impact, however, this should be in accordance with the facilities' decommissioning and recycling plan, and as per the agreements with the landowners concerned. • All above-ground components that are associated with the project infrastructure, such as fencing, signs etc. must be removed from site. • Reuse and recycling is preferable wherever possible.			
Effective communication should be undertaken with landowners about the timing and location of decommissioning activities.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Decommissioning has not started.
Excavated holes or trenches are to be filled and reinstated, and any structures at risk of collapsing are to be	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Decommissioning has not started.
Exposed or disturbed areas shall be revegetated and stabilized prior to being handed back to former landowners.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Decommissioning has not started.
Access roads which are no longer required are to be ripped and rehabilitated.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Decommissioning has not started.
Any roads that will not be rehabilitated, should have runoff control features which redirect water flow and dissipate any energy in the water which may pose an erosion risk. Any roads that will not be used, must be closed and form part of the rehabilitation.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Decommissioning has not started.
Regular monitoring for alien plants within the disturbed areas shall be undertaken for at least two years after decommissioning or until alien invasives are no longer a problem at the site.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Decommissioning has not started.
Erosion should be monitored annually for at least 3 years after decommissioning and any erosion problems observed along the servitude should be rectified as soon as possible using the appropriate revegetation and erosion control works.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only. Decommissioning has not started.

4.3 PHOTOGRAPHIC RECORD

Photographic Record of the Audit is provided below.



Figure 4: Works ongoing to seal base of turbine from water infiltrating at East 13.



Figure 5: Area near East 13 where cattle grazing and trampling are leading to slow regrowth in the area.



Figure 6: Weeds noted at East 8.



Figure 7: Broken fence at borrow pit heritage site at East Wind Farm.



Figure 8: Siltation of water channel at East 8.



Figure 9: Some materials not removed from site at East 17.



Figure 10: Erosion on gulley erosion on East Wind Farm



Figure 11: Siltation of watercourse at East 8



Figure 12: TLB or heavy vehicle has damaged area near East 17.

5 AUDIT CONCLUSION

Environmental Impact Management Services (Pty) Ltd. (EIMS) was appointed by Enel Green Power RSA (Pty) Ltd (EGP) on behalf of Red Cap Impofu East RF (Pty) Ltd (Impofu East), Red Cap Impofu West RF (Pty) Ltd (Impofu West) and Red Cap Impofu RF (Pty) Ltd (Impofu North). as an Independent Environmental Auditor (IEA) to undertake environmental audits as required by condition 29 of the Environmental Authorisations (EAs) for the three Impofu Wind Farms near Oyster Bay in the Eastern Cape Province, South Africa. These wind farms are referred to collectively as the Impofu Wind Farms (the Impofu Cluster). The consolidated site of the Impofu Cluster is bordered 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.

The scope and objective of the audit was to assess compliance with the conditions of the Environmental Authorisation (EA), Environmental Management Programme (EMPr) and subsequent EA Amendments. This audit represents the independent post-construction audit findings for the three Impofu Wind Farms East Wind Farm and excludes the grid connection infrastructure and Buffer Yard which are subject of separate audits. Initial documentation was obtained and reviewed in preparation for the audit. Checklists and questionnaires were prepared based on the requirements of the EA's.

Following the initial checklist preparation and documentation review, a site visit/ audit was undertaken on the 26th of May 2026 to determine compliance with the requirements of the EA and EMPr.

The EA assessment achieved a Straight Compliance Score of 94.33% and a Weighted Compliance Score of 97.16%. Whilst the Environmental Management Programme (EMPr), the compliance assessment yielded a Straight Compliance Score of 89.77% and a Weighted Compliance Score of 94.65%.

It should be noted that the final audit report was submitted to DFFE on the 19th of June 2026. Subsequent feedback received from the Department requested that the report be revised to clearly address and distinguish the requirements and compliance status associated with the separate EA's. This report is therefore being revised accordingly to ensure that the findings and assessment are appropriately aligned with the respective EAs.

A summary of the key findings and recommendations resulting from the audit is provided below and the detailed findings and recommendations are provided in **Section 4**:

- Erosion and stormwater management remain a concern, with erosion observed along access roads, rehabilitated areas, side slopes, and drainage channels. Significant siltation was also noted in stormwater infrastructure.
- Rehabilitation and revegetation efforts are underway; however, vegetation establishment has been unsuccessful in some areas due to livestock trampling and ongoing land use activities.
- Livestock access to rehabilitation areas is affecting vegetation recovery, with several areas not adequately fenced or protected.
- Alien invasive plant species are present across the site and require ongoing management and removal.
- Heritage resource management was generally implemented; however, damaged fencing around heritage no-go areas was noted, and a heritage-related non-compliance occurred when excavation activities proceeded without adequate archaeological monitoring.
- Archaeological monitoring requirements were not consistently adhered to due to communication and scheduling shortcomings.
- Sediment and pollution control measures require improved maintenance to prevent impacts on watercourses.



- Demarcation fencing and barriers in some locations require repair and maintenance.
- Construction materials and equipment have largely been removed, although isolated remnants remain on site.
- Certain Environmental Authorisation conditions, particularly relating to erosion control, rehabilitation, alien plant management, health and safety planning, and EMPr implementation, were not fully complied with.

6 ASSUMPTIONS AND LIMITATIONS

The following assumptions, limitations and gaps in knowledge apply to the audit:

- 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 of the assessment. The information, data, observations, and evidence on what this report is based 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.
- Numerical scores are indicative only and do not reflect the relative legal or environmental significance of each finding. Material findings are interpreted based on the nature, consequence, and persistence of the non-compliance, not only the percentage score.
- Although this audit is framed as a post-construction compliance audit, conditions assigned to earlier project phases were not automatically excluded from consideration. Where such conditions had continuing relevance, created enduring obligations, or were linked to observable legacy impacts or ongoing management requirements, they were considered as part of the audit. Conditions were only treated as not applicable where they were clearly historical in nature and no longer had a bearing on the current compliance status of the site.
- Given the scale of the project area and the practical limitations inherent in a time-bound compliance audit, the audit was based on representative sampling of documentation, personnel inputs, and physical site conditions. The conclusions reached should therefore be read as reflecting the Auditor's findings based on the sample reviewed and evidence available at the time, rather than as an absolute warranty of compliance for every part of the project footprint or for all times outside the audit period.
- This audit does not specifically assess compliance with any other permits, licences, or authorisations applicable to the operations.