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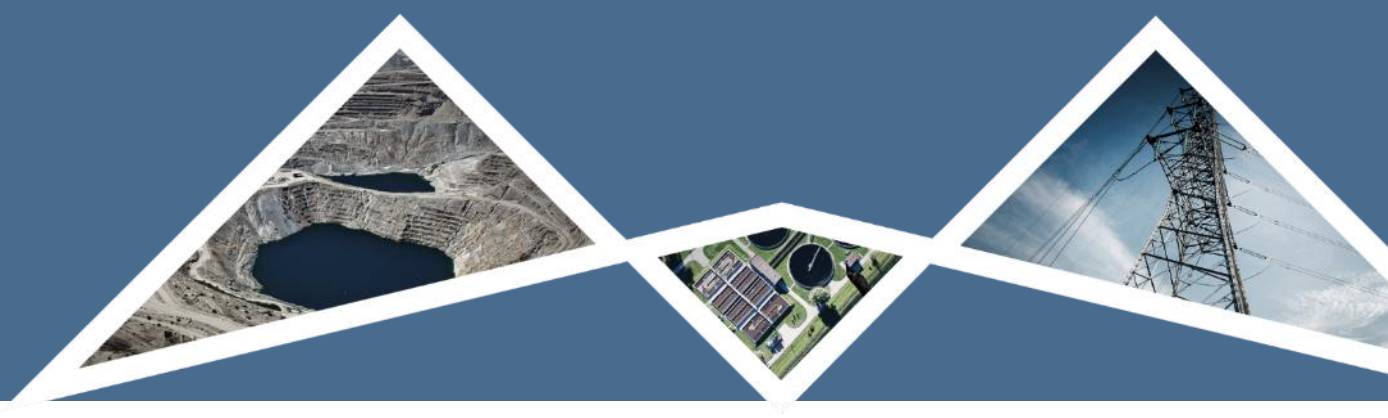
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MAY 2025 MONTHLY ECO AUDIT REPORT

IMPOFU CLUSTER WIND ENERGY FACILITY

DEA Reference Numbers:

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



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2025/06/13	REVISION 1	Final ECO Report

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List of Abbreviations

Abbreviation	Item
DEA	Department of Environmental Affairs
DFFE	Department of Forestry, Fisheries and the Environment
DWS	Department of Water and Sanitation
EA	Environmental Authorisation
ECO	Environmental Control Officer
EO	Environmental Officer
EGP	Enel Green Power

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

Definitions

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

NEMA section 30 incident	"Incident" means an unexpected, sudden and uncontrolled release of a hazardous substance, including from a major emission, fire or explosion, that causes, has caused or may cause significant harm to the environment, human life or property.

1 INTRODUCTION

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

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

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

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

1.1 DETAILS OF THE HOLDER

Details of the holder are summarised in Table 1 below.

Table 1: Details of the holder.

Company Name	Red Cap Impofu (Pty) Ltd.
Company Registration	Mr Manuele Battisti
Head Office Physical Address	2017/118197/07
Head Office Telephone Number	102 Rivonia Road Sandton Johannesburg 2196
Head Office Fax Number	(010) 344 0388
Head Office Contact Person	Mr Manuele Battisti
Operations Physical Address	Impofu Wind Farm Cluster
Operations Telephone number	083 268 1963
Operations Contact Person	Mr Sadao Chika

1.2 BRIEF PROJECT DESCRIPTION

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

Impofu North

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

Impofu East

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

Impofu West

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

Authorisations, Permit and or Management Plans

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

The below authorisations were obtained for the aforementioned:

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

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

Other permits (such as biodiversity) may also apply. Refer to section 4.3 for additional permits.

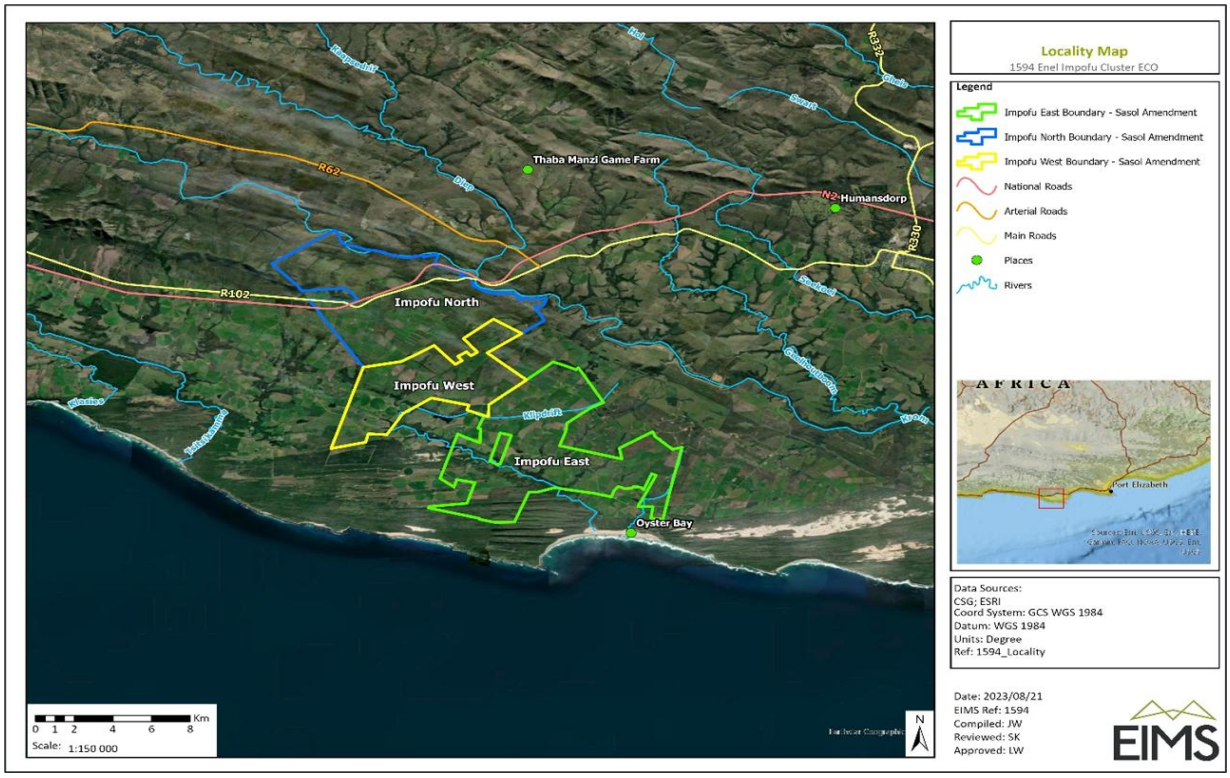


Figure 1: Impofu Cluster boundaries

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

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

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

- Turbines: Up to 19 turbines with a hub height of 120m, and rotor diameter of 163m, the minimum tip height (ground clearance) will be at least 38.5m;
- Crane hard stands: One per turbine, with a permanent hardstand 50m x 40m which will remain for maintenance purposes;
- Access and internal roads: The internal gravel roads will be approximately 6m wide with potential side drains. Some sections of these roads would need to the temporary widened up to 12m during construction;
- On-site substation: Each substation is approximately 150 x 75m (11 250m^2) which will occupy the area for operation and maintenance;

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

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

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

1.3 PROJECT PROGRESS

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

- WTG foundation;
- Crane pads;
- Access roads;
- North substation;
- East substation;
- Powfontein substation;

- West substation;
- MV reticulation;
- Met mast excavations and installation;
- Internal overhead line foundations, installation of mono poles, and stringing;
- Delivering of turbine components at the buffer yard and WTG positions; and
- Tower pre-assembly, installation, and assembling.

2 DETAILS OF THE ECO

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

2.1 EXPERTISE OF THE ECO

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

2.2 DECLARATION OF INDEPENDENCE

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

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

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

Signature: 

3 SCOPE, PURPOSE AND OBJECTIVE OF THE AUDIT

The scope of the audit is to assess compliance with the conditions of the Impofu Wind Farms (North, West and East) and their associated infrastructure EA/EMPr as well as related permits and licences near Oyster Bay in the

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

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

4 AUDIT METHODOLOGY

4.1 PROCEDURE FOR THE AUDIT

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

During the audit, the ECO requested the following information:

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

4.2 EVALUATION CRITERIA USED DURING THE AUDIT

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

- Full-Compliance: Indicating that the condition was fully complied with and provided with a compliance score of 4.
- Partial-Compliance: Indicating that the condition has not been fully complied with and that additional measures are required to obtain full compliance. Partial compliances were provided with a compliance score of 2.

- Non-Compliance: Indicting that the condition has not been complied with and provided with a compliance score of 0.
- Not Applicable (N/A): Indicating that the condition is not currently applicable. Not applicable conditions were removed from the total number of conditions from which the compliance score was calculated during this reporting period.

4.3 DOCUMENTATION REVIEW

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

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

- The 2nd amendment of the EA for the 182MW Impofu North Wind Energy Facility (reference Number: 14/12/16/3/3/2/1102/AM2) was approved by DFFE on the 6th of December 2022. This was read together with the EA dated 25 September 2019 and the 1st amendment dated 11 November 2020.
- The 2nd amendment of the EA for the 168MW Impofu West Wind Energy Facility (reference Number: 14/12/16/3/3/2/1103/AM2) was approved by DFFE on the 6th of December 2022. This was read together with the EA dated 23 September 2019 and the 1st amendment dated 16 November 2020.
- The 2nd amendment of the EA for the 189MW Impofu East Wind Energy Facility (reference Number: 14/12/16/3/3/2/1104/AM2) was approved by DFFE on the 6th of December 2022. This was read together with the EA dated 25 September 2019 and the 1st amendment dated 16 November 2020.
- The 3rd amendment of the EA for the 189 MW Impofu East Wind Energy Facility (reference Number: 14/12/16/3/3/2/1104/AM3) was approved by DFFE on the 24th of February 2025.
- The 3rd amendment of the EA for the 182MW Impofu North Wind Energy Facility (reference Number: 14/12/16/3/3/2/1102/AM3) was approved by DFFE on the 07th of March 2025.
- The 3rd amendment of the EA for the 168MW Impofu West Wind Energy Facility (reference Number: 14/12/16/3/3/2/1103/AM3) was approved by DFFE on the 07th of March 2025.
- Buffer yard and concrete batching plant for the Impofu Wind Cluster (reference Number: 14/12/16/3/3/1/2776) was approved on the 24th of October 2023.
- Environmental Management Programme (EMPr) revision five and the site layout map was approved by the DFFE on the 13th of June 2023.
- Water Use Authorisation (General Authorisation – GA) for abstraction (Section 21a) of water for industrial use of two boreholes was approved on the 29th of September 2021 for the Impofu North Wind Farm.
- Water Use Authorisation (GA) for Section 21 (c, i and g) was approved on the 21st of September 2021 for the Impofu North Wind Farm.
- Water Use Authorisation (GA) for abstraction (Section 21a) of water for industrial use of two boreholes was approved on the 29th of September 2021 for the Impofu West Wind Farm.
- Water Use Authorisation (GA) for Section 21 (c, i and g) was approved on the 06th of October 2021 for the Impofu West Wind Farm.
- Water Use Authorisation (GA) for abstraction (Section 21a) of water for industrial use of two boreholes was approved on the 29th of September 2021 for the Impofu East Wind Farm.
- Water Use Authorisation (GA) for Section 21 (c, i and g) was approved on the 06th of October 2021 for the Impofu East Wind Farm.
- Water Use Authorisation (GA) for Section 22 (1) (a) (iii) was approved on the 1st of November 2019 for the abstraction of water from a registered dam for the wind farms.
- Mineral and Petroleum Resources Development Act 28 of 2002 (MPRDA) Section 53 Consent for the Impofu North Wind Farm was received on the 16th of September 2019 with no expiry date.
- Water Use Authorisation (GA) for Section 21 (a, c and i) was approved on the 26th of January 2024 for the Impofu West Wind Farm.
- Water Use Authorisation (GA) for Section 21 (a, c, and i) was approved on the 29th of July 2024 for the Impofu East Wind Farm.

- Exemption regarding pruning of *Syderoxylon Inerme* (White Milkwood) Tree (reference number: 20/8/5/1-RCIW) received from DFFE on the 18th of July 2024.
- Turbine blade painting approval on Impofu East and West Wind Farm from Civil Aviation Authority on the 06th of October 2024.

Monitoring documents and registers

The construction EMPr has been made part of the contract documentation with the Contractors appointed to construct the Impofu Wind Farms and associated infrastructure as required by condition 4.1.1.2 of the EMPr. Environmental training/induction is conducted by the EOs for site employees and management regarding the contents of the EA and the EMPr. Training registers are kept in the site file. Environmental Officer weekly monitoring reports are available and up to date.
Relevant environmental method statements were available and reviewed by the ECO as required by the EMPr section B section 3.1.2. Registers were available in the contractors site file such as the updated incident register; a complaint register; updated water register; an updated training register; as well as the updated waste register.

Waste Management

Domestic/General Waste

Waste separation is encouraged for recycling purposes where possible. Power Construction has appointed an independent service provider, Luvan Plant Hire (Pty) Ltd for collection and disposal of general waste at registered landfill site, Humansdorp Landfill site (permit number: 12/9/11/P53) in Kouga Local Municipality. A total of 54 m^3 of general waste was collected from site and disposed at the landfill site in April and May 2025. Waste disposal certificates are kept in the environmental file for records. Isiviko Construction (Pty) Ltd, Power Buildings subcontractor dispose waste at Humansdorp landfill site using their bakkies. During this reporting period, Isiviko disposed 38 refuse waste bags from disposing waste on the 15th, 16th, and 19th of May 2025. Brand Besamandla dispose waste at Power Construction waste management area. The ECO advised that the safe disposal certificates be filed for auditing and record retention purposes.

Nordex has appointed an independent service provider, Zumbe Services (Pty) Ltd who has appointed Luvan Plant Hire (Pty) Ltd for collection and disposal of general waste at registered landfill site, Humansdorp Landfill site (permit number: 12/9/11/P53) in Kouga Local Municipality. A total of 129 m^3 of general waste was collected from site and disposed at the landfill site in April and May 2025.

Hazardous Waste

Power Construction has appointed independent service provider, Extreme Projects to collect, transport and dispose of hazardous waste at a registered hazardous landfill facility. Extreme Projects (registration number: 2011/05) transports hazardous waste to Aloes II Waste Treatment Facilities (Licence Number: 12/9/11/L624/1). During this reporting period, no hazardous waste required disposal.

Sewage Waste

Power Construction (Power) appointed a service provider for chemical toilets, Bidvest Toilet Hire (Bidvest). Bidvest service, collect and dispose effluent at a registered treatment plant (Fishwater Flats Wastewater Treatment Works- licence number: 12/9/11/L433/1) at Nelson Mandela Bay Municipality. Power appointed another service provider for mobile flushable ablution facilities (Portable toilets) at the site camp. The flushable toilets are serviced by Sewage Works (Pty) Ltd (SW). SW disposes effluent at Jeffreys Bay Wastewater Treatment Works under Kouga Local Municipality (Licence number: 12/K90F/EF/4333). During this reporting period, Bidvest collected 349,22 m^3 of effluent for disposal from servicing toilets in April and May 2025. SW pumped and disposed a total of 70 m^3 of sewage from servicing the conservancy tank in April and May 2025. Waste disposal certificates are available in the contractor's environmental file.

At the substations (North, East, West, and Powfontein), Brand Besamandla, Power Buildings, Imvelenhle, M&T Solution and Renpower also appointed a service provider, Bidvest to service, collect and dispose effluent at a registered treatment plant (Fishwater Flats Wastewater Treatment Works with Licence number: 12/9/11/L433/1 and permit number: T2021/005) at Nelson Mandela Bay Municipality. The contractor makes use of chemical toilets that are serviced twice a week. During this reporting period, Bidvest collected 2,696 m^3 of effluent for disposal from servicing toilets in April and May 2025.

Nordex has installed conservancy tanks at the site camp. During this reporting period, conservancy tanks had not been emptied or serviced yet. Johnson Crane Hire has appointed a service provider, Women of Strength to provide ablution facilities who has appointed Bidvest to collect and dispose effluent at a registered treatment plant (Fishwater Flats Wastewater Treatment Works with Licence number: 12/9/11/L433/1 and permit number: T/2021/005). During this reporting period, Bidvest disposed 11,52 m^3 of effluent from servicing toilets in April and May 2025.

Health Care Risk Waste

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

Water Consumption

Power, Besamandla, and Nordex currently use water abstracted from Steynburg, Biggs, Cilliers, Vermaak, and Masterson farm boreholes. Water readings taken on the 17th of May 2025 show that they have abstracted 13 050 m^3 at Steynburg farm (Impofu West), 1 256 m^3 at Biggs farm (Impofu North), 14 684 m^3 at Cilliers farm (Impofu West), 5 385 m^3 at Vermaak farm (Impofu West), and 9 657 m^3 at Masterson farm (Impofu East) during this reporting period. Water from the boreholes is used for dust suppression of access roads as well as other work areas and to flush toilets at the site camp. Power has stopped abstracting water from Oyster Bay Dam.

The water from the boreholes is also used for dilution of the bio-security cleaning agent for the Foot and Mouth Disease on farms. At the site camp, filtration system for consumption is currently in use and certificate of analysis for the water was received on 26 July 2024 from Talbot Laboratories (Pty) Ltd. The parameters tested on the sample submitted (021321/24 and 021322/24) conform to the SANS 241:2015 requirements for drinking water. Nordex purchases water for consumption at Humansdorp.

Water Use Authorisations Compliance Monitoring

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



Figure 2: Water for construction stored in water tanks at East substation.

4.4 SITE ASSESSMENT

The audit was conducted on the 20th and 22nd of May 2025. Activities for this reporting period include the following:

- **Foundations**: WTG recess and duct trenching, concrete blinding and recess pouring, WTG steel fixing and shutter installation, dewatering WTG excavations, foundation cast main pour, WTG backfilling, foundation grouting as well as rigid inclusions remedial works and dewatering at WTG W17.
- **Crane pads and platforms**: Bulk earthworks on platforms, clearing and grubbing, crane pad bulk earthworks, construction of blade fingers.
- **Access Roads**: Maintenance and widening of District Roads (DR1765 and MN50032), bulk earthworks and roadbed processing of internal roads as well as Security Bellmouths, load and haul of G5 material for importation and pre-shaping of internal roads, internal road gravel importation and roadworks, stormwater installations, culvert installations, stormwater stone pitching for trimming and drainage, stormwater V-Drain excavations as well as trapezoidal drains.
- **Other activities**: Installation and maintenance of fences and cattle grid fencing, removing stockpiles and hauling excess material to spoil, bulk earthworks cut to fill and process, importing wearing course material, topsoil reinstatement, installation of permanent signage as well as Crane pad handover.

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

- **West Substation**:
    - Eskom building: painting, installation of DB in relay room, completion of cable trench curbs, plastering of conservancy tank, and brickwork for the water tank.
    - Independent Power Producer (IPP) building: Cable trench curbs ongoing, oil dam concrete casting, and installation of tornados.
    - Operation and Maintenance (O&M) building: Office brickwork ongoing, mesh installed in office building, plumbing, and electrical floor boxes, and excavating for conservancy tanks.
    - Brickwork office building.
- **Powfontein Substation**:
    - Steel installation.
    - Excavation and installation of subsoil drainage and manholes.
    - Casting and setting out foundations.
    - Control room plumbing and ceiling installation.
    - Foundation earth tail excavation and installation.
- **North Substation**:

- IPP switchgear room casting of floors.
- Backfilling and compaction cap bank erection.
- Erection of isolator steel, and casting PIU JBs
- Fence installation in the Eskom section ongoing.

- **East Substation**:
  - Primary equipment installation.
  - Rebar assembling and shuttering.
  - Bricklaying on the IPP and O&M building.
  - Installation of roof trusses at the Eskom building.
- **MV Cable installation**
  - Cable trenching and installation at the North, East, and West Wind Farms.
  - Cable installation and backfilling at North, East, and West Wind Farm.
- **Met Mast**
  - Torquing of the nuts at West 28 met mast.
  - Installation of instruments at East met mast.

Nordex is currently undertaking the following activities:

- Delivering components for the main assembly and material for installation;
- Site establishment;
- Pre-assembly of internals, pre-loading milk run trucks, and transportation of keystones;
- Pre-assembling of concrete tower section at Impofu West;
- Tower assembly and grouting at Impofu North and West; and
- Preparation of a hub, Nacelle and blades at Impofu West and East.



Figure 3: Sorting of waste at Power main site camp.



Figure 4: Installation of cable route markers and permanent signage along internal access roads.



Figure 5: Rebar setting at WTG E12.



Figure 6: Construction of a Trapezoidal drain at Road East 12.



Figure 7: Shuttering for a primary structure at East substation.



Figure 8: Installation of lightning masts at East substation.



Figure 9: Construction of IPP building at East substation.



Figure 10: Road maintenance at Road East 18.



Figure 11: Hauling of material at WTG W17.



Figure 12: De-watering and cleaning turbine base at WTG W17.



Figure 13: Setting out and excavations at Powfontein substation.



Figure 14: Oil dam concrete casting at West substation.



Figure 15: Transformer delivered at North substation.



Figure 16: Conservancy tanks installed and operational at Nordex site camp.



Figure 17: Assembled tower at WTG N2.



Figure 18: Assembled tower at WTG N4 (from a distance).



Figure 19: Preparation of Nacelle and Hub at WTG N12.



Figure 20: Painted blade has been delivered at WTG E5.



Figure 21: Delivering of keystones at WTG W5.



Figure 22: Delivery of equipment at Nordex warehouse.

5 RESULTS OF THE AUDIT / LEGAL COMPLIANCE

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

5.1 COMPLIANCE SUMMARY

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

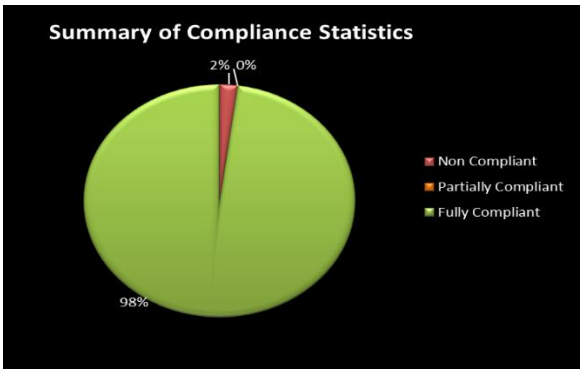


Figure 23: Summary of compliance with the requirements of the **Impofu West EA** (Power Construction).

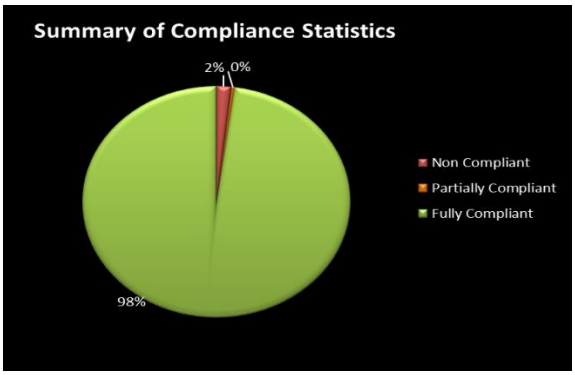


Figure 24: Summary of compliance with the requirements of the **Impofu West EMPr** (Power Construction).

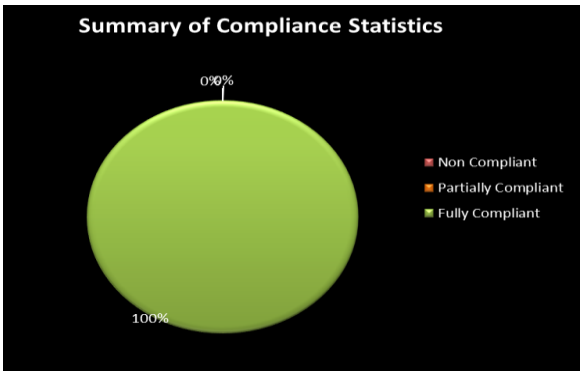


Figure 25: Summary of compliance with the requirements of the **Impofu East EA** (Power Construction).

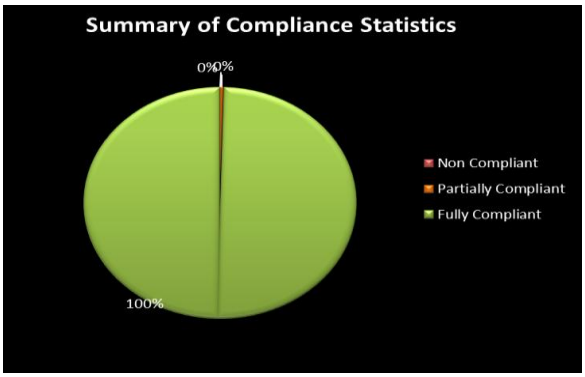


Figure 26: Summary of compliance with the requirements of the **Impofu East EMPr** (Power Construction).

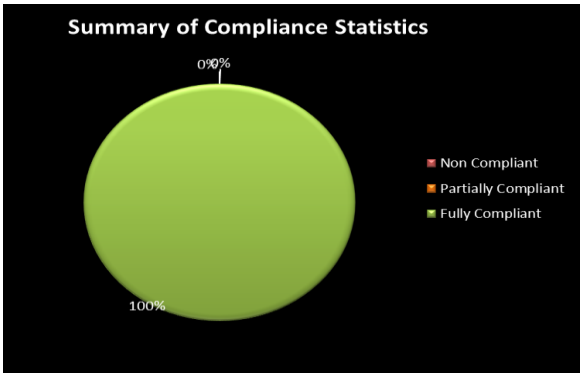


Figure 27: Summary of compliance with the requirements of the **Impofu North EA** (Power Construction).

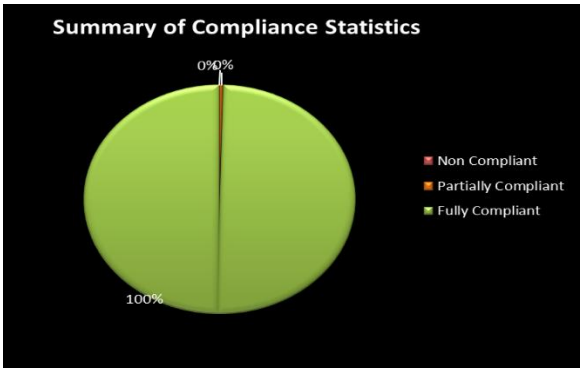


Figure 28: Summary of compliance with the requirements of the **Impofu North EMPr** (Power Construction).

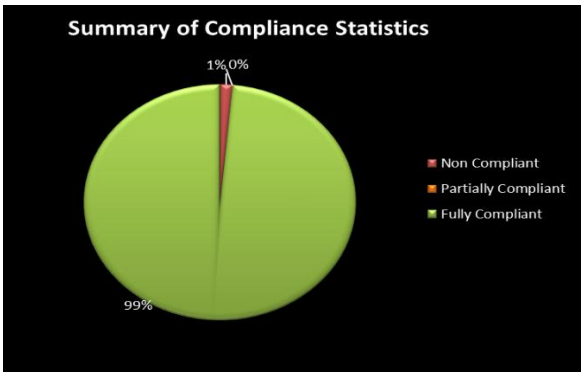


Figure 29: Summary of compliance with the requirements of the **Impofu North EA** (Nordex)

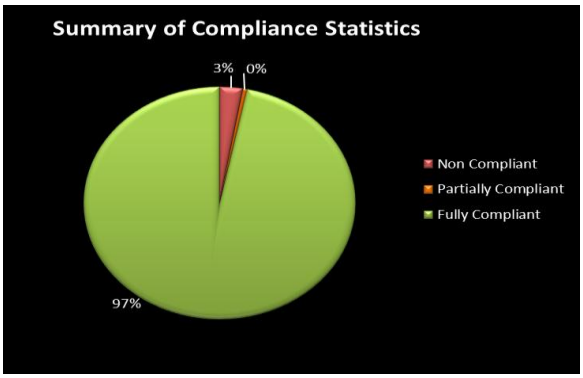


Figure 30: Summary of compliance with the requirements of the **Impofu North EMPr** (Nordex)

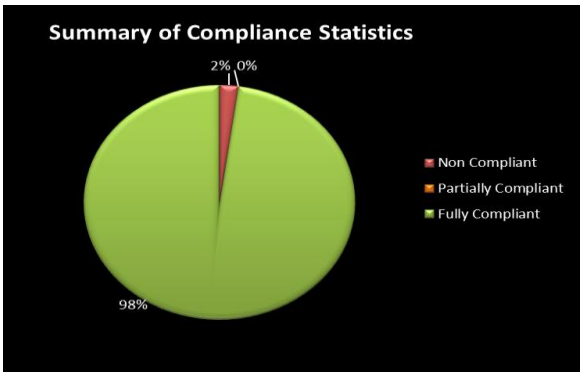


Figure 31: Summary of compliance with the requirements of the **Impofu West EA** (Nordex)

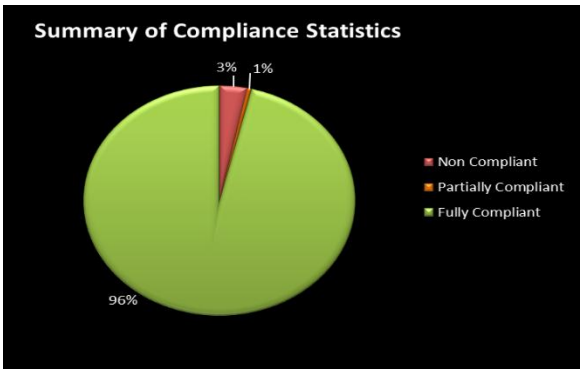


Figure 32: Summary of compliance with the requirements of the **Impofu West EMPr** (Nordex)

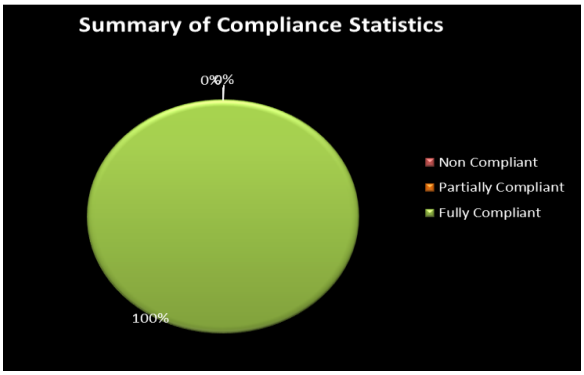


Figure 33: Summary of compliance with the requirements of the **Impofu East EA** (Nordex)

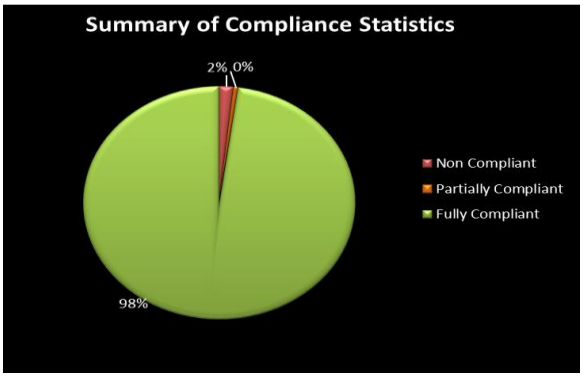


Figure 34: Summary of compliance with the requirements of the **Impofu East EMPr** (Nordex)

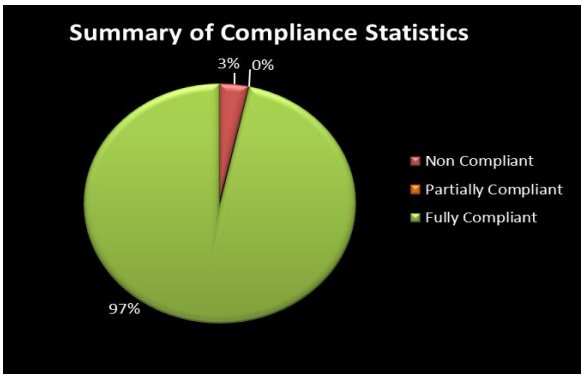


Figure 35: Summary of compliance with the requirements of the **Buffer Yard EA** (Nordex).

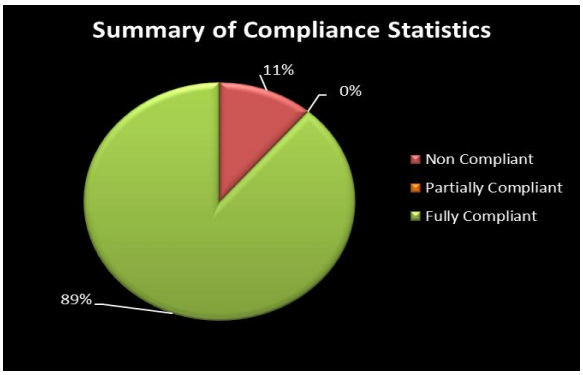


Figure 36: Summary of compliance with the requirements of the **Buffer Yard EMPr** (Nordex).

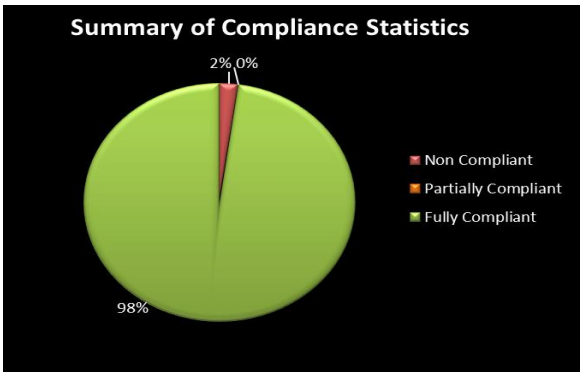


Figure 37: Summary of compliance with the requirements of the **Substations EMPr** (Brand Besamandla).

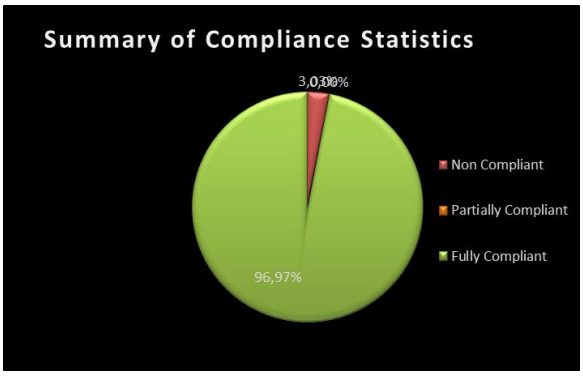


Figure 38: Summary of compliance with the requirements of the **Water Use Authorisations (GA)** (Power Construction).

5.2 GOOD COMPLIANCES

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

Location	Category	Responsible Party	Description	Photo Reference
Road North 17	Gate management	Power Construction	Cattle grids installed on site to mitigate risks of gates being left open.	 Figure 39: Cattle grid installed at Road North (RN) 17.
Road North 3	Erosion control	Power Construction	Stone pitching done to prevent erosion in stormwater crossings at RN3.	 Figure 40: Stone pitching done to prevent erosion in stormwater crossings.

Location	Category	Responsible Party	Description	Photo Reference
Site Camp	Protection of fauna	Power Construction	Mice and rats are trapped then released to the veld away from working areas.	 Figure 41: Mice and rats trapped at the site camp then release to the velds.
East substation	Pollution prevention	Brand Besamandla	Concrete mixed in mixing trays to prevent ground pollution and run off.	 Figure 42: Concrete mixed in mixing trays to prevent ground pollution and run off.

Location	Category	Responsible Party	Description	Photo Reference
Buffer yard	Pollution prevention	Nordex	Drip tray placed under a parked truck to prevent ground pollution during an accidental spillage.	 Figure 43: Drip tray placed under a parked truck.
East substation	Pollution prevention	Brand Besamandla	Painting of cable route markers on an impermeable surface to prevent ground pollution at East substation.	 Figure 44: Painting of cable route markers on an impermeable surface at East substation.

5.3 AREAS OF CONCERN

Three (03) new concerns were raised during this reporting period:

- Housekeeping that is not done appropriately in some working areas.
- Fuel spillages are not always reported immediately to Environmental Officers.
- It was noted that contractors occasionally wait until waste bins are too full in order to transport waste to waste management areas.

Areas of concern have the potential to become non-compliances or incidents if not adequately considered or addressed, where required.

5.4 NON-COMPLIANCES

Nine (09) new non-compliances were noted during this reporting period. Four (04) NCs were raised for Power Construction, one (01) raised for Brand Besamandla, and four (04) raised for Nordex. Areas of non-compliances can be escalated to Non-Compliance Report (NCR) if not adequately addressed within the timeframes agreed to.

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

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

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
057	EA 108 **For Power Construction** EMPr 5.3.9.14 **For Power Construction**	Leakage of fuel must be avoided at all times and if spillage occurs, it must be remedied immediately. 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.	Hydrocarbon spillages were observed in a laydown area at the site camp.	The contractor should ensure that spillages are cleaned immediately.	**Open/ Uncorrected**	 Figure 45: Hydrocarbon spillage noted at the site camp.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		• 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.				

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
058	EA 111 **For Power Construction** EA 112 **For Power Construction** EMPr 5.3.9.3 **For Power Construction**	Hazardous substances must not be stored where there could be accidental leakage into surface or subterranean water. Hazardous and flammable substances must be stored and used in compliance to the applicable regulations and safety instructions. Furthermore, no chemicals must be stored nor may any vehicle maintenance occur within 350m of the temporal zone of wetlands, a drainage line with or without an extensive floodplain or hillside wetlands. If potentially Hazardous Chemical Substances are to be stored on site, then: • Hazardous Chemical Substances shall be stored in appropriate containers which are clearly labelled and sealed. • Hazardous Chemical Substance containers shall be situated on a smooth impermeable surface (concrete or 250 micrometre (µm) plastic (plastic must have a minimum of a 5 cm layer of sand on	A container with Petrol noted placed on a broken drip tray within a wetland at Road West (RW) 10.	The contractor should not place any chemical within a wetland or river.	**Open/ Uncorrected**	 Figure 46: Container with Petrol placed within a wetland at RW10.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		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. 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				
	EMPr 5.3.9.14 **For Power Construction**					

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		of Water and Sanitation (DWS), and the Proponent. • The responsible operator shall have the required training to use the spill kit, or to contain the spill. • The activity causing the spill is to cease, and the spill is to be contained using a spill kit, sand berms, sandbags, sawdust, absorbent materials or similar. • Should any soil become contaminated by oil or fuel spills then the soil shall be removed. • Contaminated soil and material shall be stored in bags or sealed and labelled drums in the designated hazardous waste area of the site and disposed of in accordance with Section 0. • Any contaminated soil that cannot be removed is to be treated in situ as determined by the ECO. any construction camp, storage of vehicles, any storage, washing and maintenance of equipment, and any storage of construction				
	GA condition 7 (3) (a) (1)					

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
	For Power construction	materials, or chemicals, as well as any sanitation and waste management facilities - (i) is located outside the 1 in 100-year flood line or riparian habitat of a river, spring, lake, or dam and or outside any drainage area feeding any delineated wetland or pan, and				
060	EMPr 5.3.10.2 **For Power Construction**	Cement powder has a high pH, and spillage of cement powder and concrete slurry can affect soil and water pH. Spillage on permeable surfaces shall be prevented, and cement laden water/runoff shall be collected and disposed of as water containing waste.	Cement powder spillage observed in a laydown area at the site camp.	The contractor should clean-up cement powder spillage and store contaminated soil for safe disposal.	**Open/ Uncorrected**	 Figure 47: Cement powder spillage observed at site camp.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
061	EMPr 5.3.12.5 **For Power Construction**	All vehicles and plant shall be provided with a suitably sized service pan/drip tray to be used to effectively trap fuel leaks in the event of a breakdown. • Drip trays shall be provided for all plant including stationary plant (such as compressors) and for "parked" plant (such as scrapers, loaders or any vehicle).	Drip tray was not placed under a parked tractor in a laydown area at the site camp.	The contractor should place drip tray under all parked plants and machinery.	**Open/ Uncorrected**	 Figure 48: Drip tray not placed under parked tractor.
062	EMPr 5.9 **For Brand Besamandla** EMPr 5.17 **For Brand Besamandla**	In the event of a spill, prompt action must be taken to clear the polluted or affected areas; The tanks/ bowsers must be situated on a smooth impermeable surface (concrete) with a permanent bund. The impermeable lining must extend to the crest of the bund and the volume inside the bund must be 130% of the total capacity of all the storage tanks/ bowsers (110% statutory requirement plus an allowance for rainfall); Provision must be made for refuelling at the storage area by	Diesel spillages were observed under a parked diesel bowser at West substation. Diesel bowser not situated on a smooth impermeable surface.	The contractor should conduct inspection in order to clean-up spillages promptly and also ensure that drip tray is placed under parked machinery as well as during refuelling. Diesel bowser should be situated on a smooth impermeable surface.	**Open/ Uncorrected**	 Figure 49: Diesel spillage under a diesel bowser at West substation.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		protecting the soil with an impermeable groundcover. Where dispensing equipment is used, a drip tray must be used to ensure small spills are contained; In the event of a spill, contaminated soil must be collected in containers and stored in a central location and disposed of according to the National Environmental Management: Waste Act 59 of 2008. Refer to **Section 5.7** for procedures concerning **storm and waste water management** and **5.8** for **solid and hazardous waste management**.				
062	EMPr 7.1 Objective 04 and 12 **For Nordex**	Drip trays or any form of oil absorbent material must be placed underneath vehicles/machinery and equipment when not in use. Appropriately contain any generator diesel storage tanks, machinery spills (e.g., accidental spills of hydrocarbons oils, diesel etc.) in such a way as to prevent them leaking and entering the environment.	Drip trays not placed under parked trucks.	The contractor should ensure that drip trays are placed under parked trucks.	**Open/ Uncorrected**	 Figure 50: Drip tray not placed under a parked truck.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
063	EA 108 **For Nordex** EMPr 5.3.9.16 **For Nordex**	Leakage of fuel must be avoided at all times and if spillage occurs, it must be remedied immediately. 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	A Fuel spillage was observed at WTG N2. An absorbent fibre was placed on top of the spillage and not removed.	The contractor should ensure that spillages are cleaned properly, and contaminated soil and material be stored appropriately for safe disposal.	**Open/ Uncorrected**	 Figure 51: Spillage with absorbent fibre at WTG N2.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		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.				
064	EA 115 **For Nordex** EMPr 5.3.15.6 **For Nordex**	An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate reduction, recycling and re-use options where appropriate. Where solid waste is disposed of, such disposal shall only occur at a landfill licensed in terms of section 20(b) of the National Environment Management Waste Act, 2008 (Act 59 of 2008). Appropriate general waste (e.g. construction debris, rubble, timber, tins, drums and domestic waste) collection, storage and removal from site shall be implemented. • Waste shall be removed daily from areas remote from camp and transferred to the appropriate waste storage facility. • All non-recyclable litter and refuse shall be disposed of off-site at a	An integrated waste management approach not implemented as waste was not stored appropriately at WTG N2. General waste at WTG N2 not stored appropriately and was blown by wind.	The contractor should store waste in provided waste bins to avoid being blown by wind and spread on or from site. Waste should also be stored appropriately for safe disposal in a licensed landfill site.	**Open/ Uncorrected**	 Figure 52: General waste blown by wind at WTG N2.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
	EMPr 5.3.15.7 **For Nordex**	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.				
	EA 111 **For Nordex** EA 112 **For Nordex**	Hazardous substances must not be stored where there could be accidental leakage into surface or subterranean water. Hazardous and flammable substances must be stored and used in compliance to the applicable regulations and safety instructions.	Hazardous substance at the warehouse were not stored appropriately and not in accordance with hazardous and flammable substances regulations and safety instruction.	The contractor should make provision for hazardous chemical storage area where access will be restricted. All relevant Material Safety Data Sheets (MSDSs) for all Hazardous Chemical Substances on site shall	**Open/ Uncorrected**	

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
	EA 113 **For Nordex** EMPr 5.3.3.2 **For Nordex**	Furthermore, no chemicals must be stored nor may any vehicle maintenance occur within 350m of the temporal zone of wetlands, a drainage line with or without an extensive floodplain or hillside wetlands. Temporary bunds must be constructed around chemical storage to contain possible spills, 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.	Temporary bund has also not been constructed by the contractor. Relevant Material Safety Data Sheets (MSDSs) for all Hazardous Chemical Substances on site not available and all staff working with chemicals not trained on safe use of the chemical.	be readily available and all staff working with chemicals be trained on safe use of the chemical.		 Figure 53: Hazardous chemicals not stored appropriately.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		• 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. 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. If potentially Hazardous Chemical Substances are to be stored on site, then: • Hazardous Chemical Substances shall be stored in appropriate containers which are clearly labelled and sealed. • Hazardous Chemical Substance containers shall be situated on a smooth impermeable surface (concrete or 250 micrometre (µm)				
	EMPr 5.3.9.2 **For Nordex** EMPr 5.3.9.3 **For Nordex**					

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		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. All staff working with Hazardous Chemical Substances shall be trained in the safe use of the substance in accordance with the MSDS.				
	EMPr 5.3.9.4 **For Nordex**					

5.5 NON-COMPLIANCE REPORTS

Non-Compliance Reports (NCRs) are issued to the project or relevant contractor if the recorded NCs are not addressed in the agreed timeframes. One (01) NCR was issued during the current reporting period. This was issued to Nordex and was related to improper waste management practices at the buffer yard.

5.6 AVIFAUNAL MONITORING

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

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

The following observations were made during the monitoring:

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

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

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

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

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

5.7 STATUS OF NON-COMPLIANCES REPORTED DURING PREVIOUS REPORTING PERIODS

This section provides the status of the non-compliances that were raised during the previous ECO Audits. The ECO recorded four (04) non-compliance during the previous audit.

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

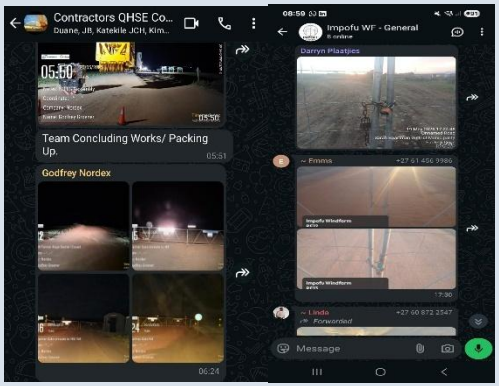
Status Description	Colour Scale
Closed-Out/ Corrected	
Work in Progress (WIP)	
Open/ Uncorrected	

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
035	EMPr 5.2.1.38	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.	The contractor shares the construction programme with the EA Holder on regular basis. However, this programme was not shared with the ECO and/or appointed archaeologist resulting in construction works being undertaken in areas that required specialist	The archaeologist subsequently visited the site for monitoring. The ECO is awaiting finalisation of the specialist report and recommendations from the provincial authority in this regard.	**Work in Progress** An Archaeologist was notified about construction works and conducted monitoring on the 20th of February 2025 at WTG E13 to E19.	N/A

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
			monitoring in the absence of the specialist.			
039	EA 36 **For Nordex** EMPr 7.1 Objective 2 **For Nordex** EMPr 7.1 Objective 11 **For Nordex**	An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal. Ensure waste storage facilities are maintained and emptied on a regular basis. All litter must be deposited in a clearly marked, closed, animal proof disposal bin in the construction area. Waste management must be a priority and all waste must be collected and stored adequately. Waste should be stored at a licensed facility. It is recommended that all waste be removed from site on a weekly basis to prevent rodents and pests entering the site. Maximum domestic waste storage period will be up to 10 days. Specific areas must be designated on-site for the	Integrated waste management approach was not implemented on site as environmental impacts were not minimised at the buffer yard where waste skip for general waste was full not covered.	The contractor should improve waste management by covering skips to prevent waste from being blown by wind and ensure that all waste is placed inside waste skips. An NCR was issued by the ECO on the 26th of May 2025.	**Work in Progress** An NCR was issued by the ECO on the 26th of May 2025.	 Figure 54: General waste placed next to a skip at the buffer yard.

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
		temporary management of various waste streams, i.e. general refuse, construction waste (wood and metal scrap), and contaminated waste as required. Location of such areas must seek to minimise the potential for impact on the surrounding environment, including prevention of contaminated runoff, seepage, and vermin control Any waste generated during construction must be stored into designated containers and removed from the site by the construction teams. Waste management must be a priority and all waste must be collected and stored adequately.				
046	EMPr 5.3.4.2 **For power Construction**	Should portable/chemical toilets be used then these shall be used and maintained in such a way that they do not cause water or other pollution: • No toilet facilities shall be located closer than 50 m to any water body. • Toilets shall be adequately	Chemical toilet at RN 1 was not secured to the ground and a spillage from servicing the toilet was observed.	The contractor should ensure that toilets are anchored to the ground and not serviced regularly at RN1.	**Closed-Out/ Corrected** The contractor has anchored and serviced toilet at RN1.	

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
		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.				Figure 55: Toilet anchored to the ground at RN1.
047	EMPr 5.3.15.7 **For Nordex**	Precautions shall be taken to avoid any waste from spreading on, or from, the site. • Scavenger and weatherproof	Waste bins provided at WTG N6 and N1 were not enough for the	The contractor should provide enough waste bins that are sufficient capacity	**Closed-Out/ Corrected** The contractor has collected and disposed	N/A

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
		bins with lids shall be provided at the contractor's camp, of sufficient number and capacity to store the general domestic waste produced on a daily basis. • Bins shall not be allowed to become overfull and shall be emptied regularly at the waste storages areas in the Contractor's camp, or directly transferred to an approved landfill.	waste stored there. Waste was placed on a trailer and could easily be blown away by wind.	to waste that is produced on site.	waste that was not stored appropriately at WTG N6 and N1.	
048	EMPr 5.4.1.2 **For both Brand Besamandla and Nordex** EMPr 5.4.2.1 **For both Brand Besamandla, and Nordex**	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. 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.	Landowners have been complaining about contractors not adhering to gate management. Gates management has not been done properly, gates have been reported left open, and cows end up mixing.	The contractor should always adhere to landowners' gate management protocols and ensure that all gates are closed when they leave site after a shift.	**Open/ Uncorrected** Contractors send photographs before and after shift as proof that gates are not left open. This procedure is reported to be working well but farmers are still complaining about gates being left open.	 Figure 56: Contractors send photograph before and after shift as proof that gates are not left open.

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
		•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.				
053	EA 108 **For Power Construction** EMPr 5.3.9.9 **For Power Construction** EMPr 5.3.9.14 **For Power Construction**	Leakage of fuel must be avoided at all times and if spillage occurs, it must be remedied immediately. Where refuelling away from the dedicated refuelling station is required, a mobile refuelling unit shall be used and appropriate and adequate ground-protection such as drip trays used. The Contractor shall submit a Method Statement to the Contract Manager and ECO for approval of the procedure for dealing with an accidental hydrocarbon spill: • Any single spill in excess of 200 shall be reported to the Department of Water and	Fuel spillages were observed at WTG W17, E13 and at the site camp. Drip tray not placed under diesel bowser used for refuelling by drilling team. Bowser noted leaking to the ground. No measures taken to prevent soil contamination from a leaking diesel bowser at WTG W17.	The contractor should ensure that drip tray is placed under diesel bowser and fix or replace the leaking bowser. Contaminated soil should be cleaned and stored appropriately at the waste management area for safe disposal in a registered hazardous waste facility.	**Closed-Out/ Corrected** The contractor has taken leaking diesel bowser off site and applied OilCap to a spillage at the site camp.	N/A

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
	EMPr 5.3.12.5 **For Power Construction**	Sanitation (DWS), and the Proponent. • The responsible operator shall have the required training to use the spill kit, or to contain the spill. • The activity causing the spill is to cease, and the spill is to be contained using a spill kit, sand berms, sandbags, sawdust, absorbent materials or similar. • Should any soil become contaminated by oil or fuel spills then the soil shall be removed. • Contaminated soil and material shall be stored in bags or sealed and labelled drums in the designated hazardous waste area of the site and disposed of in accordance with Section 0. • Any contaminated soil that cannot be removed is to be treated in situ as determined by the ECO. All vehicles and plant shall be provided with a suitably sized service pan/drip tray to be used to effectively trap fuel leaks in the event of a breakdown. • Drip trays shall be provided for all plant including stationary				

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
		plant (such as compressors) and for "parked" plant (such as scrapers, loaders or any vehicle).				
054	EMPr 5.3.10.2 **For Power Construction** EMPr 5.3.10.4 **For Power Construction**	Cement powder has a high pH, and spillage of cement powder and concrete slurry can affect soil and water pH. Spillage on permeable surfaces shall be prevented, and cement laden water/runoff shall be collected and disposed of as water containing waste. Bagged cement shall be stored at an appropriate facility, and empty cement bags shall be soundly secured with adequate binding material should these be stored on site.	Damaged cement bags were observed causing ground pollution at WTG W17. Bagged cement was not stored appropriately.	Where possible, the contractor should fence cement laydown areas to prevent livestock from damaging the bagged cement.	**Closed-Out/ Corrected** Damaged bagged cement was removed from WTG W17	 Figure 57: Damaged bagged cement was removed from WTG W17.
055	EA 115 **For Nordex** EMPr 5.3.15.6	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).	An integrated waste management approach not implemented as waste was not stored appropriately at WTG N6 and N1.	The contractor should store all waste in the skips at the buffer yard for safe disposal in a registered landfill site.	**Closed-Out/ Corrected** The contractor has collected and disposed waste that was not stored appropriately at WRG N6 and N1.	N/A

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
	For Nordex	Appropriate general waste (e.g. construction debris, rubble, timber, tins, drums and domestic waste) collection, storage and removal from site shall be implemented. • Waste shall be removed daily from areas remote from camp and transferred to the appropriate waste storage facility. • All non-recyclable litter and refuse shall be disposed of off-site at a licensed landfill facility approved by the Contract Manager and ECO.				
056	EMPr 7.1 Objective 2 **For Nordex** EMPr 7.1 Objective 04 **For Nordex**	Ensure compliance with all national, regional and local legislation with regard to the storage, handling and disposal of hydrocarbons, chemicals, solvents and any other harmful and hazardous substances and materials. Storage of potential contaminants must be undertaken in bunded areas.	Oil waste (hazardous) not stored according to legislation. Drum with oil waste was placed on top of a pallet at the Buffer Yard.	The contractor should store oil waste in a bunded area to prevent contamination in an event of an accidental spillage.	**Open/ Uncorrected**	 Figure 58: Oil waste not stored in a bunded area at the Buffer Yard.

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
	EMPr 7.1 Objective 11 **For Nordex**	Hydrocarbon waste must be contained and stored in sealed containers within an appropriately bunded area and clearly labelled. This must be regularly removed and recycled (where possible) or disposed of at an appropriately licensed landfill site. Ensure compliance with all national, regional and local legislation with regard to the storage, handling and disposal of hydrocarbons, chemicals, solvents and any other harmful and hazardous substances and materials. The onus is on the Contractor to identify and interpret the applicable legislation. Hazardous waste to be disposed of at a registered landfill site.				

5.8 INCIDENTS

Six (06) new incidents were reported during this reporting period. Inadequate diesel bowser was utilised by Steyns Drilling as obvious leaks from the bowser was evident and diesel spills on the ground at WTG W17. Environmental Manager instructed the sub-contractor to remove the diesel bowser from site. Medium oil spill from hydraulic pipe burst was reported at WTG E17. Drip tray was placed beneath plant to contain leaking oil, afterwards spill kit was used to clean spill and dispose of material at the hazardous waste bin.

Whilst Bidvest was busy pumping out effluent from the Bio-Security ablution unit on Road North (RN) 1/RN14 Bellmouth, a foreign object was sucked into to the pump and during the emergency stop some effluent was spilled on the Gravel Road of RN1. The spill was immediately cleaned by Bidvest up with their containment equipment

A minor spillage occurred when a pecker broke down while operating at Impofu North internal overhead lines at Tower 14. The Environmental Officer identified the spillage and advised the team to clean it up. The contaminated soil was taken to the hazardous waste area at the site camp. A hydrocarbon spill was noted at WTG N1 and this was discussed with Johnson Aguardo as a crane sub-contractor. This required an investigation to find out the responsible contractor and thus delayed the process of cleaning and receiving a flash report with information from the contractor. An NCR was issued to Johnson Aguardo for the delayed response to cleaning the spill. The spill was cleaned and contaminated soil was removed and stored as hazardous waste.

At Conrad Dreyer Property nearby WTG W8, a gate pole was broken by the rear of a truck that was transporting blades to site. This was discussed with Tembo, the sub-contractor that transports blades to site and a company was recommended for them to appoint for the repair. The gate was then repaired accordingly. The contractor is advised to report all environmental incidents to the ECO for monitoring of requisite remedial action undertaken by the contractor following an incident.

5.9 COMPLAINTS

One (01) new complaint was reported to the ECO during this reporting period. A farmer reported that a gate was left opened and his cows went to eat in another farmer's yard. All complaints have been recorded in the complaints register and are being monitored for closure by the EO and ECO. It should be noted that all environmental complaints should be reported to the ECO as soon as they occur.

6 CONCLUSION

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

Table 5: Summary of observations noted.

Description	Number Raised during Reporting Period	Total Number Raised	Total Number Open/ Uncorrected
Areas of Concern	**3**	**20**	**3**
Non-compliances	**9**	**65**	**13**
Non-compliance Reports	**1**	**1**	**1**
Incidents	**6**	**23**	**0**
Complaints	**1**	**17**	**1**

7 ASSUMPTIONS AND LIMITATIONS

The following assumptions and limitations apply to this report:

- The information contained in this report was sourced from information and data supplied by third parties that is assumed to be complete, valid, and true.
- This report is based on information available at the time. The information, data, observations, and evidence this report is based on is beyond the control of EIMS and may change without notice. EIMS will not be liable for any loss or damage which may arise directly or indirectly because of such changes.
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- 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.