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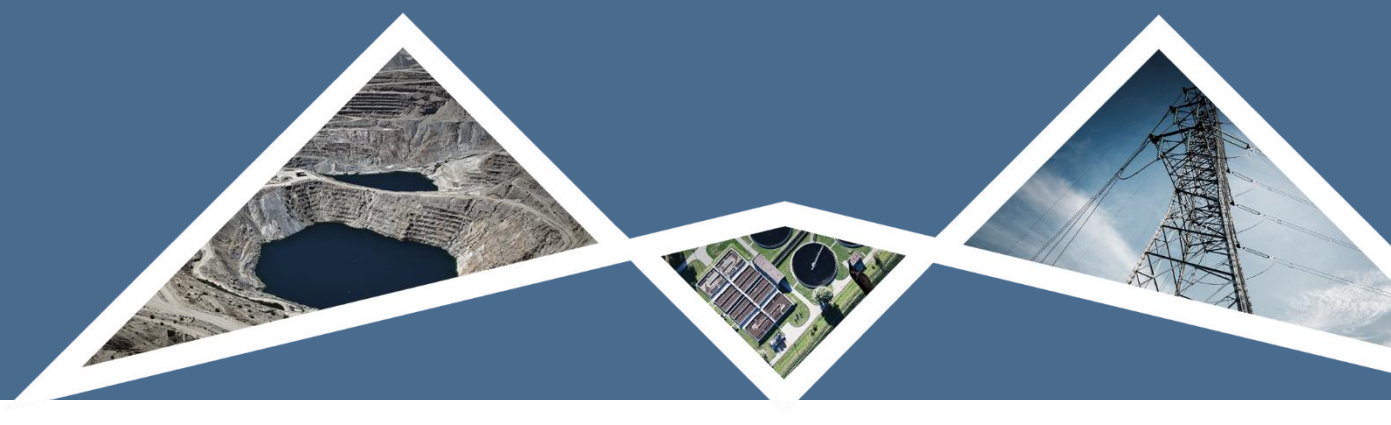
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POST-CONSTRUCTION AUDIT REPORT

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

DFFE REF:
Buffer Yard and Batching Plant: 14/12/16/3/3/1/2776

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
Enel Green Power (EGP) on behalf of Red Cap Impofu (Pty) Ltd	**Sandile Mazibuko** Email: sandile.mazibuko@enel.com **Janna Bedford-Owen** Email: janna.bedford-owen@enel.com **Sanelisiwe Mzondi** Email: sanelisiwe.mzondi@rina.org	Electronic copy

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 West (Pty) Ltd as an Independent Environmental Auditor (IEA) to undertake an environmental audit as required by condition 26 of the Environmental Authorisation (EAs) for the Buffer Yard and Concrete Batching Plant in the Eastern Cape Province, South Africa. The buffer yard for turbine assembly was also established within the Impofu North Wind Farm boundary. 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).

The scope and objective of the audit was to assess compliance with the conditions of the Environmental Authorisations (EAs), Environmental Management Plans (EMPrs) and subsequent EA Amendments. This audit represents the independent post-construction audit findings for the Buffer Yard. Initial documentation was obtained and reviewed in preparation for the audit. Checklists and questionnaires were prepared based on the requirements of the EA. Following the initial checklist preparation and documentation review, a site visit/ audit was undertaken on the 25 May 2026 to determine compliance with the requirements of the EA and EMPr.

It should be noted that the final post construction 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 Straight Compliance Score of 87.88% and a Weighted Compliance Score of 93.94% was achieved for the EA. Whilst the Environmental Management Programme (EMPr), the compliance assessment yielded a Straight Compliance Score of 89.58% and a Weighted Compliance Score of 94.79%. 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**:

- Environmental induction records and registers were not available for review, and no Invasive Alien Plant Control and Eradication Programme was provided, indicating gaps in the implementation and documentation of key EMPr requirements.
- Erosion was observed along the buffer yard boundary, affecting the perimeter fence and site security. Corrective measures are required to stabilise affected areas and prevent further deterioration.

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 West (Pty) Ltd as an Independent Environmental Auditor (IEA) to undertake an environmental audit as required by condition 26 of the Environmental Authorisation (EAs) for the Buffer Yard and Concrete Batching Plant in the Eastern Cape Province, South Africa. The buffer yard for turbine assembly was also established within the Impofu West Wind Farm boundary. 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) (See **Figure 1**).

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. 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 198 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 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.

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 174 MW Wind Farm comprised of up to 29 wind turbines. As above, this was revised and is now 112.1MW through 19 turbines. (Refer to Figure 1 for the Impofu Cluster boundaries).

The Buffer Yard is located within the Impofu West boundary, and was used for the construction/assemblage of keystones for all above mentioned wind farms. The Buffer Yard covers a total of 6.5 ha.

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

Table 1: Authorization applicable to the post-construction audit

Authorization	Date of Authorization	Reference Number	Amendments
Buffer Yard EA	24 October 2023	14/12/16/3/3/1/2776	None

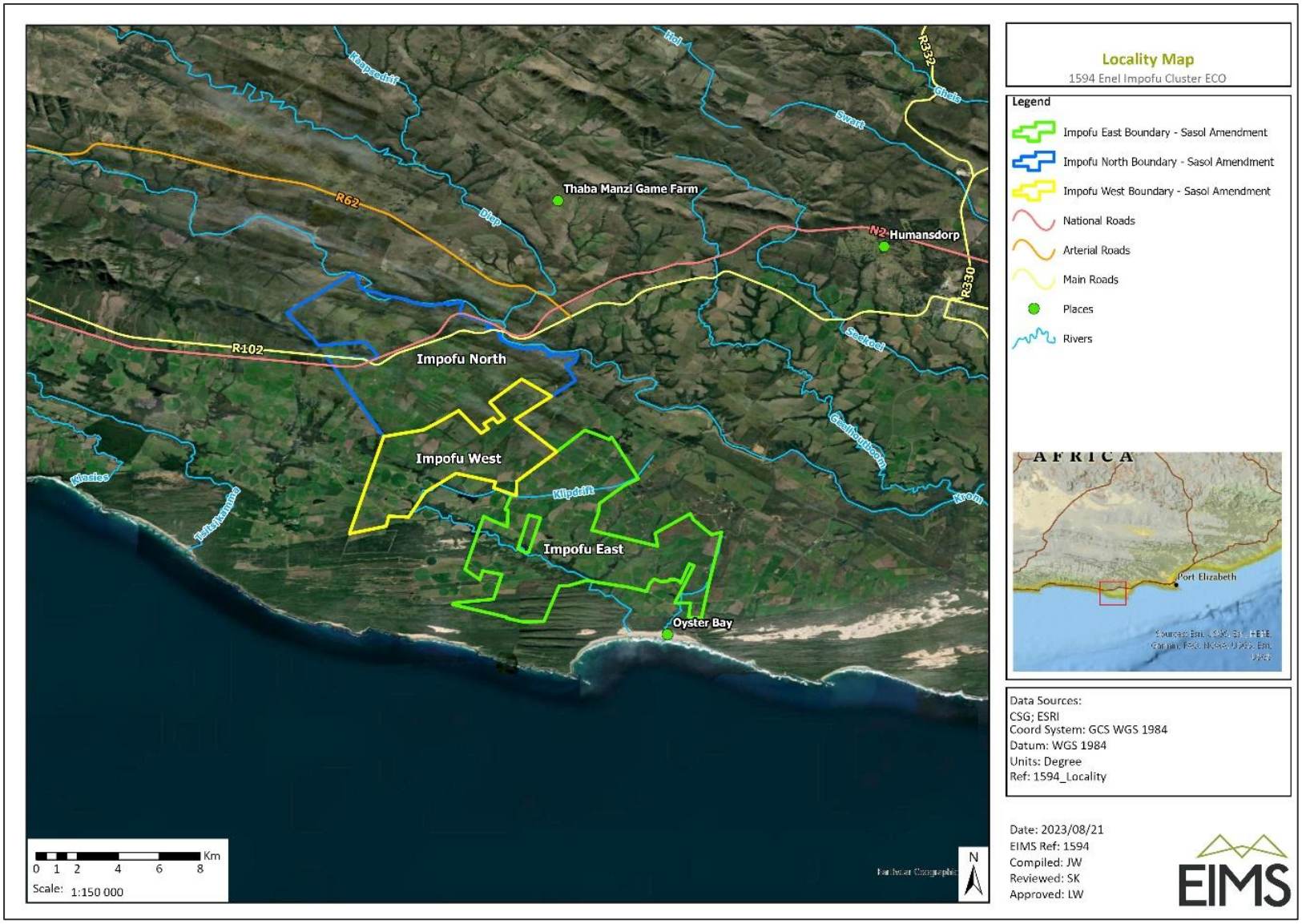


Figure 1: Impofu Wind Farm Cluster Boundaries

1.2DETAILS OF THE HOLDER

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

Table 2: Details of the Holder.

Company Name	Red Cap Impofu West (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 audits.

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 of the Impofu Cluster Buffer Yard detailed in **Section 1.1**. 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 EA and EMPr. After the initial checklist preparation and documentation review, a site visit was undertaken on the 25th of 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 Buffer yard is provided below:

A total of forty-nine (49) license conditions were considered for the EA of which thirty-three (33) were found to be applicable and sixteen (16) were found not applicable to the current phase of the audit. While a total of two-hundred and thirty-one (231) conditions were considered for the Environmental Management Programme (EMPr), of which ninety-six (96) were found to be applicable and one hundred and thirty-five (135) were not applicable to the current phase of the audit.

The Environmental Authorisation (EA) assessment achieved a **Straight Compliance Score of 87.88%** and a **Weighted Compliance Score of 93.94%**. Whilst the Environmental Management Programme (EMPr), the compliance assessment yielded a **Straight Compliance Score of 89.58%** and a **Weighted Compliance Score of 94.79%.**

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 Authorisations 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.

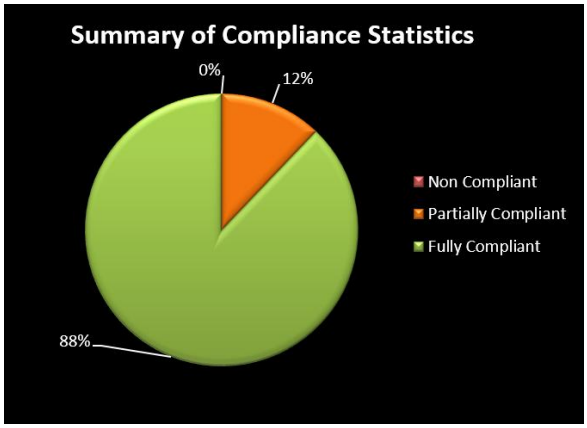


Figure 2: Summary graph illustrating compliance scores against the requirements of the EA.

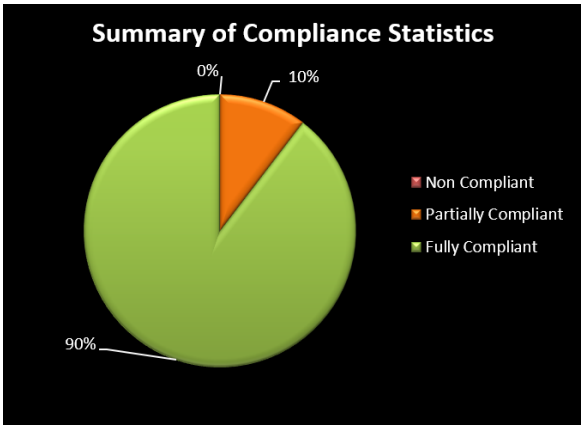


Figure 3: Summary graph illustrating compliance scores against the requirements of the EMPr.

4.2 DETAILED COMPLIANCE EVALUATION

Table 3 - 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 Buffer Yard Environmental Authorisation

Condition	Compliance Y/N	Compliance Rating	Comments/Verification
Scope of Authorisation			
The proposed buffer yard and concrete batching plant, as part of Impofu Wind Energy Facility Cluster, on Portion 1 of the Farm Klip Rug 676 and on Remainder Farm 676, within Ward 1 and Ward 4 of the Kouga Local Municipality and Kou-Kamma Local Municipality, in the Eastern Cape Province is approved as per the geographic coordinates cited in the table above.	N/A	N/A	Information item. No compliance verification required.
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. No compliance verification required.
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	Information item. The EA holder has confirmed that the EA formed part of the contractors' contracts.
The activities authorised may only be carried out at the property as described above.	Y	4	The buffer yard was utilised for the storage of keystones and cranes as approved.
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	RedCap Impofu West remains the holder of the EA. No alienation, transfer or changes of land rights have occurred.
This activity must commence within a period of five (05) years from the date of issue of this Environmental Authorisation. 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	Activity commenced within five years from the date of issue of the EA. The EA is dated 24/10/2023.
Construction must be completed within five (05) years of the commencement of the activity on site.	Y	4	Information item. Noted by the holder of the EA and contractor. Construction was completed in July 2026.

Condition	Compliance Y/N	Compliance Rating	Comments/Verification
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 23rd of October 2023.
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	Specified in the notification letter.
Commencement of the activity			
The authorised activity shall 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 may not commence with the activity until such time that the appeal has been finalised.	Y	4	Confirmation of no appeals was received by the EA holder from DFFE on 24/11/2023, following the appeals submission period. Construction commenced on 01/12/2023.
Management of the activity			
The Environmental Management Programme (EMPr) attached as Appendix H: Environmental Management Programme submitted with final BAR dated July 2013 is approved and must be implemented and adhered to.	N	2	EMPr is implemented and adhered to, although one minor non-compliance was identified with respect to erosion around the buffer yard.
The EMPr must be implemented and strictly enforced during all phases of the project. It 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	EMPr is implemented and adhered to, although one minor non-compliance was identified with respect to erosion around the buffer yard.

Condition	Compliance Y/N	Compliance Rating	Comments/Verification
Changes to the approved EMPr must be submitted in accordance with the NEMA EIA Regulations applicable at the time.	N/A	N/A	No changes have been made to the approved EMPr.
The Department reserves the right to amend the approved EMPr should any impacts that were not anticipated or covered in the BAR be discovered.	N/A	N/A	Information item. Noted.
Frequency and process of updating the EMPr			
The EMPr must be updated where the findings of the environmental audit reports, contemplated in Condition 25 below, indicate insufficient mitigation of environmental impacts associated with the undertaking of the activity, or insufficient levels of compliance with the Environmental Authorisation or EMPr.	N/A	N/A	No need to update the EMPr as the mitigation measures are still considered sufficient.
The updated EMPr must contain recommendations to rectify the shortcomings identified in the environmental audit report.	N/A	N/A	No need to update the EMPr as the mitigation measures are still considered sufficient.
The updated EMPr must be submitted to the Department for approval together with the environmental audit report, as per Regulation 34 of GN R982 of 04 December 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	No need to update the EMPr as the mitigation measures are still considered sufficient.
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 R982 of 04 December 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	Information item.
The holder of the authorisation may apply for an amendment of an EMPr, if such amendment is required before an audit is required. In assessing whether to grant such approval or not, the Department will consider the processes and requirements prescribed in Regulation 37 of GN R982 of 04 December 2014, as amended.	N/A	N/A	Amendment of the EMPr not required.
Monitoring			
The holder of the authorisation must appoint an experienced Environmental Control Officer (ECO) for the construction phase of the development that will have the responsibility to ensure that the	Y	4	Not applicable to the current audit. The audit is limited to an evaluation of post-construction phase obligations only.



Condition	Compliance Y/N	Compliance Rating	Comments/Verification
mitigation/rehabilitation measures and recommendations referred to in this Environmental Authorisation are implemented and to ensure compliance with the provisions of the approved EMPr.			
The ECO must be appointed before commencement of any authorised activities.	Y	4	Initial appointment on 21/06/2023; notification email sent on 17/11/2023.
Once appointed, the name and contact details of the ECO must be submitted to the Director: Compliance Monitoring of the Department.	Y	4	The Department was notified, with details of the ECO submitted. The notification email was sent on 17/11/2023.
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	The ECO kept a record of all site activities and transgressions. These were also recorded in the ECO reports.
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.
Recording and reporting to the Department			
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	The reports are submitted as required.
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	Conditions of the EA and EMPr were audited monthly for project compliance and reports submitted to the Director: Compliance Monitoring of the Department.
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 R982 of 04 December 2014, as amended.	Y	4	Audits and submission of reports are undertaken as per the requirements of the EMPr.
The holder of the authorisation must, in addition, submit an environmental audit report 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	The post-construction audit was undertaken on 25 May 2026. This report serves to fulfil this condition.
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	The reports are in line with the stipulated requirements.



Condition	Compliance Y/N	Compliance Rating	Comments/Verification
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	All reports are available on site in an environmental file for inspection purposes.
Notification to Authorities			
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.	Y	4	Written notice of commencement was given to the Department.
Operation of the activity			
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	The buffer yard does not have an operational phase.
Site closure and decommissioning			
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	Noted by the EA holder. The buffer yard is still being disestablished and will be partially decommissioned in line with the EMPr specifications.
Specific conditions			
The footprint of the development must be limited to the areas required for actual construction works and operational activities.	Y	4	The footprint was limited to the areas specified.
Should any archaeological sites, artefacts, palaeontological fossils or graves be exposed during construction work, work in the immediate vicinity of the find must be stopped, the South African Heritage Resources Agency (SAHRA) must be informed and the services of an accredited heritage professional obtained for an assessment of the heritage resources.	N/A	N/A	No archaeological sites, artefacts, palaeontological fossils or graves were exposed during construction work.
All declared aliens must be identified and managed in accordance with the Conservation of Agricultural Act, 1983 (Act No. 43 of 1983).	Y	4	No weeds were noted in the vicinity of the buffer yard area.
Vegetation clearing must be kept to an absolute minimum. Mitigation measures as specified in the BAR dated July 2023 must be implemented to reduce the risk of erosion and the invasion of alien species.	N	2	Some erosion was noted along the fence of the buffer yard area.
An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal.	Y	4	Implemented as far as practicably possible. No concerns were raised regarding waste management.



Condition	Compliance Y/N	Compliance Rating	Comments/Verification
Any solid waste must be disposed of at a landfill licensed in terms of Section 20(b) of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008).	Y	4	General waste was disposed of at the Humansdorp Landfill Site (permit number: 12/9/11/P53) in Kouga Local Municipality.
General			
A copy of this Environmental Authorisation, the audit and compliance monitoring reports, and the approved EMPr, must be made available for inspection and copying:	Y	4	A copy of the EA, audit and compliance monitoring reports, and the approved EMPr is available for inspection.
At the site of the authorised activity;	Y	4	An environmental file containing all relevant environmental documents is available at the site camp.
To anyone on request; and	Y	4	Environmental documents are available on file for inspection by anyone.
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.
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, noted by the Applicant.

Table 4: Audit Findings for the Buffer Yard Environmental Management Programme

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
Management programme: Construction			
Objectives			
1. Securing the site and minimising impacts related to inappropriate site establishment			
Areas rated as High sensitivity and their buffers in proximity to the development areas should be declared as 'no-go' areas during the life of the project, and all efforts must be made to prevent access to these areas from construction workers and machinery. The infrastructure should be realigned to prioritise development within low sensitivity areas. Mitigated development in medium sensitivity areas is permissible.	Y	4	Although construction activities have ceased, especially close to 'no-go' areas, no incidents have been reported.
Areas of indigenous vegetation, even secondary communities outside of the direct project footprint, should under no circumstances be fragmented or disturbed further than that proposed for the project. Clearing of vegetation outside of the project footprint should be minimized and avoided where possible.	Y	4	There was no unnecessary clearing of indigenous for the buffer yard.
All laydown areas, chemical toilets etc. should be restricted to very low-low sensitivity areas.	NV	NV	Not verified. During the time of this audit, no evidence of disturbance of high sensitive areas noted as all chemical toilets were already removed.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
The areas to be developed must be specifically demarcated to prevent movement of staff or any individual into the surrounding environments.	Y	4	The buffer yard was fenced therefore development boundary was clearly visible.
The footprint area of the construction should be kept to a minimum. The footprint area must be clearly demarcated to avoid unnecessary disturbances to adjacent areas.	Y	4	Same as above. There were no complaints from adjacent landowners about work activities encroaching into their properties.
Toilets at the recommended Health and Safety standards must be provided. These should be emptied regularly, to prevent staff from using the surrounding vegetation.	NV	NV	Portable toilets at the buffer yard were serviced regularly, and service slips submitted to the ECO. However, these had been decommissioned during the time of the audit.
A comprehensive employee induction programme which covers land access protocols, fire management and road safety should be prepared.	Y	4	It was stated that the employee inductions included these items and they were conducted by the Contractor appointed for civil balance of plant.
Secure the site, working areas and excavations in an appropriate manner.	Y	4	No concerns raised regarding site security.
The Contractor must take all reasonable measures to ensure the safety of its employees. Where the construction employees could be exposed to danger by any of the works or site activities, suitable flagmen, barriers and/or warning signs in English and any other relevant indigenous languages, all to the approval of the Site Manager must be provided. All unattended open excavations shall be adequately demarcated and/or fenced.	Y	4	There were security personnel stationed at all site entrances. No active construction during the time of this audit.
Site access must be controlled and no unauthorised persons must be allowed onto the site.	Y	4	There were security personnel stationed at all site entrances. No active construction during the time of this audit.
2: Appropriate management of the construction site and construction workers			

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
Contractors and construction workers must be clearly informed of the 'no-go', very high and high sensitivity areas.	Y	4	Site induction sensitized workers and visitors to some of environmental protection practices, including observation of 'no-go' areas.
To minimise impacts on the surrounding environment, contractors must be required to adopt a certain Code of Conduct and commit to restricting construction activities to areas within the development footprint. Contractors and their sub-contractors must be familiar with the conditions of the Environmental Authorisation, the BA Report, and this EMPr, as well as the requirements of all relevant environmental legislation.	NV	NV	Not verified. Content of Contractor agreements could not be verified at the time of this audit.
Contractors must ensure that all workers are informed at the outset of the construction phase of the conditions contained on the Code of Conduct.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Introduce an incident reporting system to be tabled at weekly/monthly project meetings.	Y	4	Nordex submitted an incident register monthly to the ECO as required
All construction vehicles must adhere to clearly defined and demarcated roads.	Y	4	Construction vehicles were restricted to demarcated construction routes.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
Ensure all construction equipment and vehicles are properly maintained at all times.	N/A	N/A	It was stated that maintenance of vehicles occur as and when required. No concerns raised during audit. Condition scored not applicable by the auditor.
Ensure that construction workers are clearly identifiable. All workers should carry identification cards and wear identifiable clothing.	Y	4	All construction workers wore full PPE at all times. The security to the buffer yard required identification either using a fingerprint or identification card.
Pre-construction environmental induction must be undertaken for all construction staff on site to ensure that basic environmental principles are adhered to. This includes awareness to no littering, appropriate handling of pollution and chemical spills, avoiding fire hazards, minimising fauna interactions, remaining within demarcated construction areas etc.	Y	4	Environmental induction and registers communicated in 2024 were provided
Regular toolbox talks must be undertaken to ensure appropriate levels of environmental awareness.	Y	4	The contractor/subcontractors conducted regular toolbox talks and submitted evidence to ECO.
Contact details of emergency services should be prominently displayed on site.	Y	4	Emergency contact list was placed inside the guardhouse because the Buffer Yard was open therefore winding. And there were no offices at the buffer Yard, mostly storage shipping containers.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
No fires must be allowed on-site.	Y	4	No evidence of fires noted on site/recorded by the ECO.
Contractor must provide adequate firefighting equipment on site and provide firefighting training to selected construction staff.	Y	4	Adequate fire fighting equipment was available for each crane and truck parked at the buffer yard. There also some at the security guardhouse.
Personnel trained in first aid should be on site to deal with smaller incidents that require medical attention.	Y	4	A dedicated ambulance staffed by qualified health practitioners were stationed on site, ensuring trained first aid personnel were readily available. Furthermore, EGP and Contractors had additional personnel trained in first aid listed in the emergency contact list displayed on site.
Ensure waste storage facilities are maintained and emptied on a regular basis.	Y	4	No concerns regarding waste management raised.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
No liquid waste, including grey water, may be discharged into any water body or drainage line. All sewage disposal to take place at a registered and operational wastewater treatment works. Proof of disposal to be retained as proof of responsible disposal.	Y	4	All liquid waste was taken to Aloes II Waste Treatment Facilities (Licence Number: 12/9/11/L880/1) in Gqeberha.
Ensure that all personnel have the appropriate level of environmental awareness and competence to ensure continued environmental due diligence and on-going minimisation of environmental harm. This can be achieved through the provisionof appropriate environmental awareness training to all personnel. Records of all training undertaken must be kept.	Y	4	Toolbox talks on biodiversity protection, Air quality and environmental protection in Excavation were conducted in August 2025,
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.	N	2	The audit did not undertake a comprehensive review of the hazardous chemicals and the appropriate legislation, as the site was being disestablished. Contractors kept their HCS material inside their respective shipping containers. However, consistent poor storage and handling of hazardous chemicals was raised in ECO reports
Ensure ablution facilities are appropriately maintained. Ablutions must be cleaned regularly and associated waste disposed of at a registered/permitted waste disposal site. Ablutions must be removed from site when construction is completed.	Y	4	Chemical toilets had been removed during the time of the audit. ECO reports indicated consistent maintenance of chemical toilets.



EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
Cooking and eating of meals must take place in a designated area.	Y	4	No cooking or eating during time of audit. The site is being disestablished. ECO reports indicated no issues regarding cooking and eating outside designated area.
All litter must be deposited in a clearly marked, closed, animal proof disposal bin in the construction area.	Y	4	All waste kept in appropriate waste bins.
Keep a record of all hazardous substances stored on site. Clearly label all the containers storing hazardous waste.	Y	4	MSDS were kept by the contractor at the site camp.
A Method Statement must be compiled for the management of pests and vermin within the site, specifically relating to the canteen area if applicable.	N/A	N/A	The buffer yard was used for storage. No site camps were at the yard.
Ensure proper health and safety plans in place prior to and during the construction period to ensure safety on and around site during construction.	N	2	EGP submitted a global template as part of their HSE programme, but the document seems to only highlight expectations of EGP from the contractors, and what HSE requirements they need to adhere to.
3: Maximise impacts on the social environment associated with the construction phase.			
It is recommended that the local employment policy be adopted where possible to maximise the opportunities made available to the local labour force. Red Cap Impofu West (Pty) Limited must make it a requirement for contractors to implement a 'locals first' policy, especially for semi and low skilled job categories. If this is not possible, then the broader focus areas should be considered for sourcing workers.	Y	4	EGP submitted the company local labour recruitment procedure which considered a fair recruitment process.



EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
Employment opportunities will be for the immediate local area, Kouga and Kou-Kamma Local Municipality. If this is not possible, then the broader focus areas should be considered for sourcing employees.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
During the recruitment selection process, consideration must be given to women.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
It is recommended that realistic local recruitment targets be set for the construction phase.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
It is a requirement to source as much goods and services as possible from the local area.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Engage with local authorities and business organisations to investigate the possibility of procurement of construction materials, goods and products from local suppliers, where feasible.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
4: Protection of sensitive areas, flora, fauna and soils			
Where possible, existing access routes and walking paths must be made use of.	Y	4	Where practical, existing access routes were used, upgraded and maintained during the construction phase.
Any woody material removed can be shredded and used in conjunction with the topsoil to augment soil moisture and prevent further erosion.	N/A	N/A	If trees were removed, they were taken to the spoil site/borrow pit in line with the EMPr appendices C & D – vegetation management.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
It should be made an offence for any staff to take/ bring any plant species into/out of any portion of the project area. No plant species whether indigenous or exotic should be brought into/taken from the project area, to prevent the spread of exotic or invasive species or the illegal collection of plants.	NV	NV	Not verified. The site induction brought awareness to environmental protection and prohibition of alien invasive plant on sites.
No trapping, killing, or poisoning of any animals is to be allowed.	Y	4	There was no offence of this nature during construction/evidence of animal traps during the audit.
All construction workers should undergo an environmental induction that includes instruction on the need to comply with speed limits and the requirements of the EMPr and other permits that may be issued for the project to respect all forms of fauna. Speed limits must still be enforced to ensure that road killings and erosion is limited.	Y	4	All employees underwent environmental inductions.
Any excavations or holes must be conducted in a progressive manner. Should the holes/excavations stay open overnight they must be covered temporarily, to ensure no small fauna species fall in.	Y	4	The contractor communicated toolbox talks on safety when working in and around excavations. Excavations were never covered, only barricaded. No evidence of fauna falling into excavations was noted/recorded. No active excavation on site during audit.
Ensure that any cables and connections are insulated successfully to reduce electrocution risk.	NV	NV	No reported electrocutions on site.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
A pest control plan must be put in place and implemented. It is imperative that poisons not be used due to the likely presence of fauna.	NV	NV	Not verified. Pest control management plan or actions were not submitted at the time of reporting.
Speed limits must be put in place to reduce erosion.	Y	4	Speed limits were implemented on site.
Continuously monitor erosion on site.	N	2	Edge of buffer yard was observed with signs of erosion, affecting the fence and its security.
A hydrocarbon spill management plan must be put in place, to ensure that should there be any chemical spill out or over that it does not run into the surrounding areas.	Y	4	Included in the emergency preparedness plans.
The Contractor must be in possession of an emergency spill kit that must always be complete and available on site. The Contractor should ensure that personnel is trained accordingly in the use of spill kits.	Y	4	Emergency spill kits were always available at the buffer yard. The contractor and subcontractor's had their own and each team would go with one when they set up shop at a crane pad.
Drip trays or any form of oil absorbent material must be placed underneath vehicles/machinery and equipment when not in use.	Y	4	This was complied with during ECO site inspections. However the site is being disestablished, no standing plant or machinery observed.
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.	N	2	No concerns raised regarding spills during the audit. However the site is being disestablished, no standing plant or machinery observed.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
Noise must be kept to an absolute minimum during the evenings and at night where possible, to minimize all possible disturbances to amphibian species and nocturnal mammals.	Y	4	There were no activities at night, and there were no complaints from the farmers.
Storage of potential contaminants must be undertaken in bunded areas.	N/A	N/A	No storage of HCS material. Each subcontractor stored their own in their shipping container offices. There were no bund structures on site.
All contractors and employees should undergo induction which is to include a component of environmental awareness. The induction is to include aspects such as the need to avoid littering, the reporting and cleaning of spills and leaks and general good “housekeeping”.	Y	4	All employees underwent environmental inductions.
Toilets at the recommended Health and Safety standards must be provided. These should be emptied regularly to prevent staff from using the surrounding vegetation.	Y	4	Portable and mobile toilets were serviced frequently, at least twice a week during construction.
Vehicles and equipment must travel within demarcated areas and not outside of the construction footprint.	Y	4	None observed or reported during the audit. Only existing and/or approved access routes were used during construction.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
No materials may be stored for extended periods of time and must be removed from the project area once the construction/closure phase has been concluded.	N/A	N/A	Subcontractor came into an agreement with the landowner to rent the space at the buffer yard for long-term storage of their cranes.. These will be removed once the rehabilitation phase is concluded and buffer yard platform is handed to the landowner for future use.
No storage of vehicles or equipment will be allowed outside of the designated project areas.	Y	4	None observed or reported. Only existing and/or approved access routes were used during construction.
Exposed areas must be ripped and vegetated to increase surface roughness	N/A	N/A	No bare areas, G5 material/stone sheeting on site. The rehabilitation plan is being implemented and will be audited to ensure re-vegetation of the area as needed.



EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
Signs of erosion must be addressed immediately to prevent further erosion.	N	2	Signs of erosion noted along the buffer yard boundary.
The contractor must ensure that open fires on the site for heating, smoking or cooking are not allowed except in designated areas.	Y	4	The contractor had designated smoking areas. No evidence of fires noted.
Contractor must provide adequate firefighting equipment on site and provide firefighting training to selected construction staff.	N	2	Fire fighting equipment such as fire extinguishers and beaters were available on site during construction. Furthermore, certificated and competent staff were available on site during construction. A toolbox talk raising awareness on veldfire, prevention and action but there was no evidence of training to selected staff.
Avoid establishing large concrete areas to minimise impacts on soil.	Y	4	There was no large concrete areas established during construction. The buffer yard was made of 6.5 hectares(ha) worth of G5 material compacted to create the platform for storage of keystones, cranes, etc.
5: Minimise the establishment and spread of alien invasive plants.			
Develop and implement an Invasive Alien Plant Control and Eradication Programme (refer to Appendix C).	N	2	An alien management plan was submitted to the Department as part of the requirements of the EMPr amendment. Furthermore, toolbox talks raising awareness on alien invasive plants were conducted. Implementation of the plan was not verified.
Avoid creating conditions in which alien plants may become established:» Keep disturbance of indigenous vegetation to a minimum.» Rehabilitate disturbed areas as quickly as possible.» Do not import soil from areas with alien plants.	Y	4	No evidence of alien vegetation was noted on site. The buffer yard was made of 6.5 hectares(ha) worth of G5 material compacted to create the platform for storage of keystones, cranes, etc.



EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
When alien plants are detected, these must be controlled and cleared using the recommended control measures for each species to ensure that the problem is not exacerbated or does not re-occur.	NV	NV	Not verified. There was no evidence of alien vegetation that was noted on site.
No planting or importing any listed invasive alien plant species (all Category 1a, 1b and 2 invasive species) to the site for landscaping, rehabilitation or any other purpose must be undertaken.	NV	NV	Not verified. There was no evidence of alien vegetation that was noted on site.
All alien plant re-growth must be monitored and should it occur, these plants should be eradicated.	NV	NV	Not verified. There was no evidence of alien vegetation that was noted on site.
Any alien and invasive vegetation removed should be taken to a registered landfill site to prevent the proliferation of alien and invasive species.	NV	NV	Not verified. There was no evidence of alien vegetation that was noted on site, nor proof of disposal.
The use of herbicides and pesticides and other related horticultural chemicals should be carefully controlled and only applied by personnel adequately certified to apply pesticides and herbicides. It must be ensured that WHO Recommended Classification of Pesticides by Hazard Class 1a (extremely hazardous) or 1b (highly hazardous) are not purchased, stored or used on site along with any other nationally or internationally similarly restricted/banned products.	NV	NV	Not verified. There was no evidence of application of herbicides on the platform.
6: Protection of heritage resources			
No activities are permitted within the associated buffer areas.	Y	4	No works undertaken within heritage buffer area.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
Should any buried archaeological resources or burials be uncovered during the course of development activities, work must cease in the vicinity of these finds. The South African Heritage Resources Agency (SAHRA) must be contacted immediately in order to determine an appropriate way forward.	N/A	N/A	No heritage resources were uncovered during construction

The Chance Fossils Finds procedure must be implemented during the course of construction. Actions to be undertaken as per the procedure are as follows:* One person in the staff must be identified and appointed as responsible for the implementation of the attached protocol in instances of accidental fossil discovery and must report to the ECO or site agent. If the ECO or site agent is not present on site, then the responsible person on site should follow the protocol correctly in order to not jeopardize the conservation and well-being of the fossil material.* Once a workman notices possible fossil material, he/she should report this to the ECO or site agent. Procedure to follow if it is likely that the material identified is a fossil:- The ECO or site agent must ensure that all work ceases immediately in the vicinity of the area where the fossil or fossils have been found.- The ECO or site agent must inform SAHRA of the find immediately. This information must include photographs of the findings and GPS co-ordinates.- The ECO or site agent must compile a Preliminary Report and fill in the attached Fossil Discoveries: Preliminary Record Form within 24 hours without removing the fossil from its original position. The Preliminary Report records basic information about the find including: The date, A description of the discovery, description of the fossil and its context (e.g. position and depth of find), Where and how the find has been stored, Photographs to accompany the preliminary report (the more the better): A scale must be used, photos of location from several angles, photos of vertical section should be provided, digital images of hole showing vertical section(side). Upon receipt of this Preliminary Report, SAHRA will inform the ECO or site agent whether or not a rescue excavation or rescue collection by a palaeontologist is necessary. Digital images of fossil or fossils.* Exposed finds must be stabilised where they are unstable and the site capped, e.g. with a plastic sheet or sand bags. This protection should allow for the later excavation of the finds with due scientific care and diligence. SAHRA can advise on the most appropriate method for stabilisation.* If the find cannot be stabilised, the fossil may be collect with extreme care by the ECO or the site agent and put aside and protected until SAHRA advises on further action. Finds collected in this way must be safely and securely stored in tissue paper and an appropriate box. Care must be taken to remove the all fossil material and any breakage of fossil material must be avoided at all costs.* No work may continue in the vicinity of the find until SAHRA has indicated, in writing, that it is appropriate to proceed.	N/A	N/A	No fossil resources were uncovered during construction.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
7: Appropriate Stormwater Management			
Well-engineered, and wide enough culvert systems must be installed at all drainage systems, including those minor systems not identified during the site assessment.	N/A	N/A	Not applicable - no culverts noted in immediate area for buffer yard
Temporary stormwater channels must be filled with aggregate and/or logs (branches included) to dissipate flows.	Y	4	Stormwater channels are designed appropriately.
It is recommended that the material surrounding and holding the culverts in place include a coarse rock layer that has been specifically incorporated to increase the porosity and permeability to accommodate flooding and very low flows.	N/A	N/A	Not applicable - no culverts noted in immediate area for buffer yard
The culverts used in the design should be as large as possible, partially sunken and energy dissipating material must be placed at the discharge area of each culvert to prevent erosion of these areas. The use of larger culverts will prevent the build-up of debris by allowing the free movement of debris through the large culverts.	N/A	N/A	Not applicable - no culverts noted in immediate area for buffer yard
Culverts must avoid inundation (damming) of upstream areas by facilitating streamflow and catering properly for both low flows and high flows.	N/A	N/A	Not applicable - no culverts noted in immediate area for buffer yard

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
Surface run-off from the roads flowing down the embankments often scours the watercourse on the sides of the culvert causing sedimentation of the channel. This should be catered for with adequate concreted stormwater drainage depressions and channels with energy dissipaters that channel these flows into the river in a controlled manner.	N/A	N/A	Not applicable - no watercourses occur in the area of the buffer yard and as such no culverts were necessary or noted in immediate area for buffer yard
The culvert installations must take into account the scouring action of high flows and gabion structures or similar must be placed on both sides of the culvert on the embankments both upstream and downstream. This will serve as retention of the soils from scouring around and underneath the culvert structures aiding in the protection of the structure.	N/A	N/A	Not applicable - no culverts noted in immediate area for buffer yard
Large aggregate outsourced or from the project area (if available) can be used for energy dissipation in the channel downstream of the culverts to reduce the likelihood of scouring the riverbed and sedimentation of the catchment. It is preferable that larger aggregate be used to avoid flows removing material from the site.	N/A	N/A	Not applicable - no culverts noted in immediate area for buffer yard
Silt traps and fences must be placed in the preferential flow paths along the sensitive areas to prevent sedimentation of the water.	Y	4	Silt traps installed in line with this condition
Implement an effective storm water management plan. The effectiveness of the plan must be regularly assessed and revised if necessary.	Y	4	Stormwater is manged in line with the overall SWMP for the wind farm cluster

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
8: Management of dust and emissions			
Dust-reducing mitigation measures must be put in place and strictly adhered to. This includes wetting of exposed soft soil surfaces.	Y	4	Dust suppression was undertaken regularly at the buffer yard during construction. No dust suppression was undertaken during the time of the audit as the site was being decommissioned. No excessive dust was noted during the time of the audit.
Ensure that vehicles used to transport sand and building materials are fitted with tarpaulins or covers.	NV	NV	No construction vehicles during the time of site inspection as the site was in decommissioning phase. However, it is understood that unnecessary dust and emissions were prevented as far as possible.
Speed of construction vehicles must be restricted to 40km/hr on all roads within the site.	Y	4	Signage indicating the speed limit was displayed during construction.
Disturbed areas must be re-vegetated as soon as practicable in line with the progression of construction activities.	N/A	N/A	Noted. This will be evaluated post-rehabilitation. During the time of this audit disestablishment activities were ongoing.
Vehicles and equipment must be maintained in a road-worthy condition at all times.	Y	4	It was stated that the contractor maintained a safety file, this included necessary vehicle permits and roadworthiness documentation.
All vehicles and containers used for moving waste must encapsulate the waste, which prevents the waste from causing odours and from escaping or blowing around the site. This will also prevent leachate material from spilling out of the containers, which is hazardous.	Y	4	Waste service providers were appointed for the removal of waste. No concerns were raised. It should be noted that no waste removal occurred during the time of the audit.



EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
Ensure all vehicles are road worthy, drivers are qualified and are made aware of the potential noise and dust issues.	Y	4	It was stated that the contractor maintained a safety file, this included necessary vehicle and roadworthiness documentation. All drivers/machine operators were qualified, in line with safety protocols on site. Machinery and plant were fitted with silencers and speed limits were in place.
9: Traffic management and transportation of equipment and materials to site			
All vehicles must be road worthy and drivers must be qualified, obey traffic rules, follow speed limits and be made aware of the potential road safety issues.	NV	NV	Not verified. Contractors kept a safety file, relevant transport permits were sought. Access to the safety file was limited i.e. unavailable at the time of the audit.
Implement penalties for reckless driving for the drivers of heavy vehicles as a way to enforce compliance to traffic rules.	NV	NV	Not verified. Contractors kept a safety file, relevant transport permits were sought. Access to the safety file was limited i.e. unavailable at the time the audit.
Avoid heavy vehicle activity during 'peak' hours (when people are driving to and from work).	NV	NV	It is understood that this was complied with as much as possible. All relevant permits were sought for abnormal loads/heavy machinery and movement complied with the provisions of the RTA. Access to the logistics of deliveries was limited at the time of the audit.
The developer and engineering, procurement and construction (EPC) contractors must ensure that any damage / wear and tear caused by construction related traffic to the roads is repaired.	Y	4	During construction the contractor maintained the local roads including that managed by the municipality. Roads were in good condition during the time of the audit.
Heavy vehicles must be inspected regularly to ensure their road safety worthiness.	NV	NV	Not verified. Contractors kept a safety file, vehicle records wee kept to comply with safety requirements. Access to the safety file was limited i.e. unavailable at the time of the audit. During the time of the audit the site was undergoing decommissioning.



EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
The movement of heavy vehicles associated with the construction phase must be timed to avoid weekends, public holidays and holiday periods where feasible.	N/A	N/A	The condition was complied to as much as possible. However, the audit is limited to an evaluation of post-construction phase obligations only.
If feasible, no construction activities should be carried out during weekends and outside day time working hours	N/A	N/A	It was noted that work was undertaken Monday to Saturday. This condition was not scored as the audit is limited to an evaluation of post-construction phase obligations only.
Stagger component delivery to the site where possible.	N/A	N/A	It is understood that this was complied with as much as possible. All relevant permits were sought for abnormal loads/heavy machinery and movement complied with the provisions of the RTA.
Speed limits must be put in place and appropriate signage must be put up to raise awareness in this regard.	Y	4	Speed limits were implemented on site and site access roads.
10: Conservation of the soil resource within the site and in the adjacent areas			
Vegetation clearing must occur in a phased manner to minimise erosion and/or run-off.	NV	NV	Not verified. Vegetation clearing was completed during site establishment, and no vegetation removal was conducted as part of the decommissioning phase. However, clearing was completed, and monthly ECO reports confirmed compliance hereto. .
Topsoil must be removed and stored separately from subsoil. Topsoil must be reapplied where appropriate as soon as possible in order to encourage and facilitate rapid regeneration of the natural vegetation on cleared areas.	Y	4	Topsoil was windrowed/stockpiled around the buffer yard.
Stockpile topsoil for re-use in the rehabilitation phase. Maintain stockpile shape and protect from erosion.	Y	4	Topsoil was well protected from erosion.

Storing topsoil:» Viability of stored topsoil depends on moisture, temperature, oxygen, nutrients and time stored. » Rapid decomposition of organic material in warm, moist topsoil rapidly decreases microbial activity necessary for nutrient cycling, and reduces the amount of beneficial microorganisms in the soil. » Stockpile location must ideally be in a disturbed but weedfree area. » Storage of all topsoil that is disturbed must be of a maximum height of 2m and the maximum length of time before re-useis 18 months. » Topsoil handling must be reduced to stripping, piling (once), and re-application. Between the stockpiling and reapplication, stored topsoil must not undergo any further handling except control of erosion and (alien) invasive vegetation. » Where topsoil can be reapplied within six months to one year after excavation, it will be useful to store the topsoil as close as possible to the area of excavation and re-application, e.g. next to cabling trenches. » Do not mix overburden with topsoil stockpiles, as this will dilute the proportion of fertile soil (with less fertile subsoil or rock material). » Employ wind nets made from Hessian or similarly fibrous and biodegradable material, where required, to stabilise newly placed topsoil stockpiles and to reduce wind erosion. » In cases where topsoil has to be stored longer than 6 months or during the rainy season, soils must be kept as dry as possible and protected from erosion and degradation by:* Preventing ponding on or between heaps of topsoil.* Covering topsoil berms.* Preventing all forms of contamination or pollution.* Preventing any form of compaction.* Monitoring the establishment of all invasive vegetation and removing such if it appears.* Keeping slopes of topsoil at a maximal 2:1 ratio.* Monitoring and mitigating erosion where it appears.» Where topsoil needs to be stored in excess of one year, it is recommended to either cover the topsoil or allow an indigenous grass cover to grow on it – if this does not happen spontaneously, seeding must be considered.	Y	4	Topsoil was windrowed/stockpiled around the buffer yard. No concerns were raised regarding handling of topsoil.



EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
Regular monitoring of the site (minimum of twice annually) must be undertaken to identify possible areas of erosion, particularly after large summer thunderstorms have been experienced. Problem areas must receive follow-up monitoring by the EO to assess the success of the remediation.	Y	4	The site is monitored as required
Any erosion problems observed to be associated with the project infrastructure must be rectified as soon as possible and monitored thereafter to ensure that they do not re-occur.	N	2	Edge of buffer yard was observed with signs of erosion, affecting the fence and its security.
Re-instate as much of the eroded area to its pre-disturbed, "natural" geometry (no change in elevation and any banks not to be steepened) where possible.	N/A	N/A	This is noted and will need to be considered.
Erosion control measures such as silt fences (for areas of works) and gravel strips may be considered at the impact zone.	N/A	N/A	Noted by applicant.
Silt traps must be used where there is a danger of topsoil eroding and entering lower lying wetland resources.	Y	4	Silt traps installed in line with this condition
Construction of gabions and other stabilisation features must be undertaken to prevent erosion, if deemed necessary.	Y	4	No excessive erosion was noted inside stormwater channels, except for the banks of the site platform.
Level any remaining soil removed from excavation pits that remained on the surface instead of allowing small stockpiles of soil to remain on the surface.	Y	4	Any soil that was removed from excavation pits was properly levelled.

Reapplying topsoil: » Spoil materials and subsoil must be back-filled first, then covered with topsoil.» Immediate replacement of topsoil after the undertaking of construction activities within an area. » Generally, topsoil must be re-applied to a depth slightly greater than the topsoil horizon of a pre-selected undisturbed reference site. » The minimum depth of topsoil needed for re-vegetation to be successful is approximately 20 cm. » If the amount of topsoil available is limited, a strategy must be devised to optimise re-vegetation efforts with the topsoil available. » Reapplied topsoil must be landscaped in a way that creates a variable microtopography of small ridges and valleys that run parallel to existing contours of the landscape. The valleys become catch-basins for seeds and act as run-on zones for rainfall, increasing moisture levels where the seeds are likely to be more concentrated. This greatly improves the success rate of re-vegetation efforts. » To stabilise reapplied topsoil and minimise raindrop impact and erosion: * Use organic material from cleared and shredded woody vegetation where possible * Alternatively, suitable geotextiles or organic erosion mats can be used as necessary » Continued monitoring will be necessary to detect any sign of erosion early enough to allow timeous mitigation.	Y	4	No issues noted with replacement of topsoil during site inspection
Re-applied topsoil needs to be re-vegetated as soon as possible.	Y	4	No issues noted with replacement of topsoil during site inspection

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
11: Appropriate handling and management of waste			
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.	Y	4	No issues noted with waste management on site. Waste disposal records were made available to the auditor.
Sealable and properly marked domestic waste collection bins must be supplied on site and all solid waste collected must be disposed of at a licensed disposal facility. Under no circumstances may domestic waste be burned on site.	Y	4	Waste was kept in waste receptacles, and waste skips. The waste skip had a cover. Waste disposal records were made available to the auditor. No evidence of fires or burning of waste noted on site.
Construction method and materials should be carefully considered in view of waste reduction, re-use, and recycling opportunities.	Y	4	Construction material and waste disposal were considered and reported on. Wood waste, for instance, was donated to local persons where possible.
Construction contractors must provide specific detailed waste management plans to deal with all waste streams.	Y	4	A waste management plan was developed and implemented, covering the handling, storage, disposal, and record-keeping of waste generated on site.
Ensure that no litter, refuse, wastes, rubbish, rubble, debris and builders wastes generated on the premises be placed, dumped or deposited on adjacent/surrounding properties, and that the waste is disposed of at dumping site as approved by the Council.	Y	4	No evidence of waste dumping noted.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
Specific areas must be designated on-site for the temporary management of various waste streams, i.e. general refuse, construction waste (wood and metal scrap), and contaminated waste as required. Location of such areas must seek to minimise the potential for impact on the surrounding environment, including prevention of contaminated runoff, seepage, and vermin control	Y	4	Temporary waste storage area was available on site.
Where practically possible, construction and general wastes on-site must be reused or recycled. Bins and skips must be available on-site for collection, separation, and storage of waste streams (such as wood, metals, general refuse etc.).	Y	4	Waste separation undertaken as far as possible.
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.	Y	4	Hydrocarbon waste was stored in 250 L drums that were labelled. Waste oil was taken by a private service provider to recycling/re-use.
Waste must be stored in accordance with the relevant legislative requirements.	Y	4	No issues were noted with relation to waste.
Waste must be kept to a minimum and must be transported by approved waste transporters to sites designated for their disposal.	Y	4	Waste was transported by independent waste service providers.



EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
No liquid waste, including grey water, may be discharged into any water body or drainage line. All sewage disposal to take place at a registered and operational wastewater treatment works.	Y	N/A	All liquid waste was taken to Aloes II Waste Treatment Facilities (Licence Number: 12/9/11/L880/1) in Gqeberha.
All liquid wastes should be contained in appropriately sealed vessels/ponds within the footprint of the development and be disposed of at a designated waste management facility after use.	Y	4	Liquid waste/sewer was kept in conservancy tanks on site and removed by honeysuckers. Portable toilets were also serviced by independent service providers.
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.	N	2	Noted by the EA holder and contractor. According to ECO reports and NCR's issued to the Contractor, handling, storage and disposal of hazardous waste was poor during construction. It was note during the audit that the liquid hazardous waste drum was left open. No additional concerns raised by the auditor during the audit.
Documentation (waste manifest) must be maintained detailing the quantity, nature, and fate of any regulated waste. Waste disposal records must be available for review at any time.	Y	4	Waste disposal records kept by site personnel.
Regularly serviced chemical toilet facilities and/or septic tank must be used to ensure appropriate control of sewage.	Y	4	Liquid waste/sewer was kept in conservancy tanks on site and removed by honeysuckers.
Daily inspection of all chemical toilets and septic tanks must be performed by environmental representatives on site.	Y	4	Portable toilets were also serviced by independent service providers.



EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
In the event where sewage is discharged into the environment, all contaminated vegetation/ rock and soil must be removed immediately and treated as hazardous waste.	N/A	N/A	No sewage spill were reported to the auditor/noted during the site inspection
Ensure that the below ground storage of the septic tank can withstand the external forces of the surrounding pressure. The area above the tank must be demarcated to prevent any vehicles or heavy machinery from driving around the tank.	N/A	N/A	Septic tanks were stored in the West WF.
Any waste generated during construction must be stored into designated containers and removed from the site by the construction teams.	Y	4	Waste was temporarily stored and removed as required. Waste disposal records were kept on file.
Waste management must be a priority and all waste must be collected and stored adequately.	Y	4	No concerns raised regarding waste management.
12: Appropriate handling and storage of chemicals and/or hazardous substances	N/A	N/A	
Implement an emergency preparedness plan during the construction phase.	Y	4	Emergency Plan dealing with all environmental related emergencies was developed and implemented when required.
Any liquids stored on site, including fuels and lubricants, must be stored in accordance with applicable legislation.	N/A	N/A	Chemicals, excluding waste oils, were kept at the West WF (site camp).
Spill kits must be made available on-site for the clean-up of spills and leaks of contaminants.	N	2	Spill kits were available during construction. Site was undergoing demobilisation during the audit. However, the ECO was not there to monitor activity through decommissioning.



EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
Losses of fuel and lubricants from the oil sumps and steering racks of vehicles and equipment must be contained using a drip tray with plastic sheeting filled with absorbent material when not parked on hard standing.	Y	4	Site under demobilisation. No standing vehicles/machinery during the audit. However, during construction drip trays were placed under parked vehicles and machines to prevent soil contamination in case of leak- of spillages.
Establish an appropriate Hazardous Stores which is in accordance with the Hazardous Substance Amendment Act, No. 53 of 1992. This should include but not be limited to:» Designated area;» All applicable safety signage;» Firefighting equipment;» Enclosed by an impermeable bund;» Protected from the elements,» Lockable;» Ventilated; and» Has adequate capacity to contain 110% of the largest container contents.	N/A	N/A	Hazardous stores area not within the buffer yard.
Corrective action must be undertaken immediately if a complaint is made, or potential/actual leak or spill of polluting substance identified. This includes stopping the contaminant from further escaping, cleaning up the affected environment as much as practically possible and implementing preventive measures. Where required, a NEMA Section 30 report must be submitted to the relevant environmental authority within 14 days of the incident.	N/A	N/A	No spills/contamination events recorded/reported. Condition is thus not applicable.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
In the event of a major spill or leak of contaminants, the relevant administering authority must be immediately notified as per the notification of emergencies/incidents.	N/A	N/A	No spills/contamination events recorded/reported. Condition is thsu not applicable.
Spilled concrete must be cleaned up as soon as possible and disposed of at a suitably licensed waste disposal site.	N/A	N/A	No concrete spills noted.
Check vehicles and machinery daily for oil, fuel and hydraulic fluid leaks and undertake regular high standard maintenance on vehicles.	NV	NV	Not verified. There was no register or similar indicating daily vehicles No concerns raised with respect to vehicles
Accidental spillage of potentially contaminating liquids and solids must be cleaned up immediately in line with procedures by trained staff with the appropriate equipment.	N/A	N/A	Staff trained on spill containment as per emergency [preparedness. No spills during audit period.
Any contaminated/polluted soil removed from the site must be disposed of at a licensed hazardous waste disposal facility.	Y	4	Hazardous waste removed and disposed at the Aloes landfill, Gqeberha.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
Routine servicing and maintenance of vehicles must not take place on-site (except for emergencies). If repairs of vehicles must take place, an appropriate drip tray must be used to contain any fuel or oils.	NV	NV	Not verified. Access to the safety file or evidence of vehicle service history was limited i.e. unavailable for the audit.
Fuel storage areas must be inspected regularly to ensure bund stability, integrity, and function.	N/A	N/A	No fuel storage at the buffer yard. Mobile bowser was available to transport of fuel and refuelling of vehicles during construction.
Construction machinery must be stored in an appropriately sealed area.	N/A	N/A	Site under demobilisation. No standing vehicles/machinery were stored at the buffer yard but rather at the main sites camps.
The storage of flammable and combustible liquids such as oils will be in designated areas which are appropriately bunded, and stored in compliance with Material Safety Data Sheets (MSDS) files.	N/A	N/A	Hazardous stores area not within the buffer yard.
Any storage and disposal permits/approvals which may be required must be obtained, and the conditions attached to such permits and approvals will be compiled with.	N/A	N/A	Hazardous stores area not within the buffer yard.
Transport of all hazardous substances must be in accordance with the relevant legislation and regulations	N/A	N/A	This condition could not be verified during the time of the audit.
An effective monitoring system must be put in place to detect any leakage or spillage of all hazardous substances during their transportation, handling, installation and storage.	N/A	N/A	This condition could not be verified during the time of the audit.
Precautions must be in place to limit the possibility of oil and other toxic liquids from entering the soil or clean stormwater system.	Y	4	Drip trays were used most of the duration of construction phase, although not consistently. No concerns raised during the audit. At the time of the audit no spill risks were identified.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
As much material must be pre-fabricated and then transported to site to avoid the risks of contamination associated with mixing, pouring and the storage of chemicals and compounds on site.	Y	4	Pre-fabricated material was used as far as possible during construction, according to ECO observations and reports.
Have appropriate action plans on site, and training for contactors and employees in the event of spills, leaks and other potential impacts to the aquatic systems. All waste generated on-site during construction must be adequately managed.	Y	4	Included in the emergency preparedness plans.
Implement a contingency plan to handle spills, so that environmental damage is avoided.	Y	4	Included in the emergency preparedness plans.
Drip trays must be used during fuel/chemical dispensing.	Y	4	It was stated that drip trays are used and ECO reports have reported on such.
Drip trays to be placed beneath standing machinery/plant.	N/A	N/A	No standing plant during audit.
In the case of petrochemical spillages, the spill must be collected immediately and stored in a designated area until it can be disposed of in accordance with the Hazardous Chemical Substances Regulations, 1995 (Regulation 15).	N/A	N/A	Hazardous waste stored in appropriate receptacle until removal. None noted during audit.
The Contractor must be in possession of an emergency spill kit that must always be complete and available on site.	Y	4	Site undergoing demobilisation. However, the Contractor and sub-contractors were in possession of an emergency spill kit during construction.
Appropriately contain any generator diesel storage tanks and machinery spills (e.g. accidental spills of hydrocarbons oils, diesel etc.) in such a way as to prevent them leaking and entering the environment.	N	2	Site is undergoing demobilisation and no standing plant/machinery during audit. It should be noted that the inconsistent use of drip trays as containment of potential spillages was reported by the ECO during construction.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
8: MANAGEMENT PROGRAMME: REHABILITATION			
8.1 Objectives			
1: Ensure appropriate rehabilitation of disturbed areas such that residual environmental impacts are remediated or curtailed.			
A site rehabilitation programme must be compiled and implemented (refer to Appendix D).	Y	4	Site rehabilitation plan available In file.
Areas that are denuded during construction need to be revegetated with indigenous vegetation to prevent erosion during flood and wind events. This will also reduce the likelihood of encroachment by alien invasive plant species.	N/A	N/A	To be audited during rehabilitation inspection.
All temporary facilities, equipment, and waste materials must be removed from site as soon as construction is completed.	N/A	N/A	Site is still being disestablished. Waste materials and equipment had not yet been removed.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
All temporary fencing and danger tape must be removed once the construction phase has been completed.	N/A	N/A	Site is being disestablished. Temporary fencing had not yet been removed.
All voids must be backfilled.	N/A	N/A	Not applicable as this site will not be rehabilitated.
Where disturbed areas are not to be used during the operation of the buffer yard and concrete batching plant, these areas must be rehabilitated/re-vegetated with appropriate natural indigenous vegetation and/or local seed mix. A seed mix must be applied to rehabilitated and bare areas. No exotic plants must be used for rehabilitation purposes.	N/A	N/A	Not applicable as this site will not be rehabilitated.
No planting or importing any listed invasive alien plant species (all Category 1a, 1b and 2 invasive species) to the site for landscaping, rehabilitation or any other purpose must be undertaken.	N/A	N/A	Not applicable as this site will not be rehabilitated.
Topsoil from all excavations and construction activities must be salvaged and reapplied during reclamation. Soils must be replaced in the correct sequence / profile.	N/A	N/A	Not applicable as this site will not be rehabilitated and topsoil not reinstated.
Re-vegetated areas may need to be protected from wind erosion and maintained until an acceptable plant cover has been achieved.	N/A	N/A	Not applicable as this site will not be rehabilitated.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
Appropriately rehabilitate the project area by ripping, landscaping and re-vegetating with locally indigenous species.	N/A	N/A	Not applicable as this site will not be rehabilitated.
9: OPERATION MANAGEMENT PROGRAMME			
9.1 Objectives			
1: Securing the site and general maintenance during operation			
Site access must be controlled and no unauthorised persons must be allowed onto the site.	N/A	N/A	Not applicable. The buffer yard was authorised in the EA as temporary construction infrastructure and was not intended for use during the operational phase of the project. It should be noted that the site will not be rehabilitated and will be used by the landowner at their discretion.
General onsite maintenance of the Impofu buffer yard and concrete batching plant during the operation phase must in no way impact or negatively affect the environment. Contractors or other service providers providing onsite maintenance must be made aware of this EMPr and the contents thereof.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Post information boards within the project footprint about public safety hazards and emergency contact information.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
A grievance and consultation plan must be developed and kept on the site at all times during operation of the Impofu buffer yard and concrete batching plant. All grievances must be recorded and dealt with in the appropriate grievance channels as outlined in the grievance plan which must be established.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Community consultation with surrounding landowners and community members must continue through the life cycle of the project and must be reported on as such in the grievance and consultation plan.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
This will allow the receipt of - and facilitate resolution of concerns and grievances about the project's social and environmental issues raised by individuals or groups during the project operational period.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
2: Protection of sensitive areas, flora, fauna (including avifauna), soils, water features and maintenance of rehabilitation.			
Areas rated as High sensitivity and their buffers in proximity to the development area should be declared as 'no-go' areas during the life of the project, and all efforts must be made to prevent access to these areas from operation and maintenance staff and machinery.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
A hydrocarbon spill management plan must be put in place, to ensure that should there be any chemical spill out or over that it does not run into the surrounding areas.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
The Operator must be in possession of an emergency spill kit that must always be complete and available on site.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Drip trays or any form of oil absorbent material must be placed underneath vehicles/machinery and equipment when not in use.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
No servicing of equipment may occur on site, unless necessary.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
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.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Storm Water run-off & Discharge Water Quality monitoring must be undertaken.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
It should be made an offence for any staff to take/ bring any plant species into/out of any portion of the project area. No plant species whether indigenous or exotic should be brought into/taken from the project area, to prevent the spread of exotic or invasive species or the illegal collection of plants.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Noise must be kept to an absolute minimum during the evenings and at night where possible, to minimize all possible disturbances to amphibian species and nocturnal mammals	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
No trapping, killing, or poisoning of any animals is to be allowed.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
All staff should undergo an environmental induction that includes instruction on the need to comply with speed limits and the requirements of the EMPr and other permits that may be issued for the project to respect all forms of fauna. The induction must also include aspects such as the need to avoid littering, the reporting and cleaning of spills and leaks and general good “housekeeping”.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Speed limits must still be enforced to ensure that road killings and erosion is limited.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Heat generated from the substation, if any, must be monitored to ensure it does not negatively affect the local fauna.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Ensure that any cables and connections are insulated successfully to reduce electrocution risk.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Monitoring of the overhead power line route must be undertaken to detect bird carcasses to enable the identification of any potential areas of high impact to be marked with bird flappers if not already done so. Monitoring should be undertaken at least once a month for the first year of operation.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Implement an alien vegetation management plan.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Speed limits must be put in place to reduce erosion	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
A stormwater management plan must be implemented.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Continuously monitor erosion and compaction on site	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
3: Minimise dust and emissions to air.			
Implement appropriate dust suppression measures on a regular basis in any exposed surfaces.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Re-vegetation of cleared areas as soon as practically feasible.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Speed of vehicles must be restricted on site to 40km/hr.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Vehicles and equipment must be maintained in a road-worthy condition at all times.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
4: Ensure the implementation of an appropriate fire management plan and general management measures during the operation phase			
Fire management plan must be implemented during operations to restrict the impact fire might have on the surrounding areas.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Provide adequate firefighting equipment on site.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
Provide fire-fighting training to selected operation and maintenance staff.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Ensure that appropriate communication channels are established to be implemented in the event of a fire.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Fire breaks should be established and maintained where and when required. Cognisance must be taken of the relevant legislation when planning and burning firebreaks (in terms of timing, etc.).	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Upon completion of the construction phase, an emergency evacuation plan must be drawn up to ensure the safety of the staff and surrounding land users in the case of an emergency.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Contact details of emergency services should be prominently displayed on site.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
5: Maximise local employment, skills development and business opportunities associated with the construction phase			
It is recommended that a local employment policy be adopted by the developer to maximise the project opportunities being made available to the local community.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Enhance employment opportunities for the immediate local area. If this is not possible, then the broader focus areas should be considered for sourcing employees.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
The recruitment selection process should seek to promote gender equality and the employment of women wherever possible.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
The developer should establish vocational training programs for the local employees to promote the development of skills.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
6: Appropriate handling and management of hazardous substances, waste and dangerous goods			
Hazardous substances (such as used/new transformer oils, etc.) must be stored in sealed containers within a clearly demarcated designated area.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
A hydrocarbon spill management plan must be implemented to ensure that should there be any chemical spill out or over that it does not run into the surrounding areas.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
All contaminated soil / yard stone shall be treated in situ or removed and be placed in containers.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Drip trays or any form of oil absorbent material must be placed underneath vehicles/machinery and equipment when not in use.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Spill kits must be made available on-site for the clean-up of spills and leaks of contaminants.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Storage areas for hazardous substances must be appropriately sealed and bunded.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.



EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
All structures and/or components replaced during maintenance activities must be appropriately disposed of at an appropriately licensed waste disposal site or sold to a recycling merchant for recycling.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
All hazardous materials should be stored in the appropriate manner to prevent contamination of the site. Any accidental chemical, fuel and oil spills that occur at the site should be cleaned up in the appropriate manner as related to the nature of the spill.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Care must be taken to ensure that spillage of oils and other hazardous substances are limited during maintenance. Handling of these materials should take place within an appropriately sealed and bunded area. Should any accidental spillage take place, it must be cleaned up according to specified standards regarding bioremediation.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
All food waste, litter and all general waste l at the site should be placed in bins with lids and removed from the site on a regular basis. The waste should be disposed of at a licensed waste facility / landfill. Where possible, general waste should be recycled.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Waste handling, collection, and disposal operations must be managed and controlled by a waste management contractor.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.

EMPr Condition	Compliance Y/N	Compliance Rating	Comments/Verification
Used oils and chemicals: » Appropriate disposal must be arranged with a licensed facility in consultation with the administering authority. » Waste must be stored and handled according to the relevant legislation and regulations.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Hazardous waste (including hydrocarbons) and general waste must be stored and disposed of separately.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
All servicing and re-fuelling of machines and equipment must either take place off-site, or in controlled and bunded working areas.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Separation and recycling of different waste materials should be supported.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Immediately report significant spillages and initiate an environmental site assessment for risk assessment and remediation if necessary.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Suitable temporary solid waste facilities are to be incorporated into the design to prevent unsanitary conditions. These are to be weekly cleared and waste collected by the local waste management department.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
Disposal of waste must be in accordance with relevant legislative requirements, including the use of licensed contractors.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.
No waste may be burned or buried on site.	N/A	N/A	Not applicable to current audit. The audit is limited to an evaluation of post-construction phase obligations only.

4.3 PHOTOGRAPHIC RECORD

Photographic Record of the Audit is provided below.



Figure 4: Erosion around buffer yard fence



Figure 5: Waste separation at buffer yard storage area

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 West (Pty) Ltd as an Independent Environmental Auditor (IEA) to undertake an environmental audit as required by condition 26 of the Environmental Authorisation (EAs) for the Buffer Yard and Concrete Batching Plant in the Eastern Cape Province, South Africa. The buffer yard for turbine assembly was also established within the Impofu West Wind Farm boundary. 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)

The scope and objective of the audit was to assess compliance with the conditions of the Environmental Authorisations (EAs), Environmental Management Plans (EMPrs) and subsequent EA Amendments. This audit represents the independent post-construction audit findings for the Buffer Yard. Initial documentation was obtained and reviewed in preparation for the audit. Checklists and questionnaires were prepared based on the requirements of the EA. Following the initial checklist preparation and documentation review, a site visit/ audit was undertaken on the 25 May 2026 to determine compliance with the requirements of the EA and EMPr.

An audit Straight Compliance Score of 87.88% and a Weighted Compliance Score of 93.94% was achieved for EA. Whilst the EMPr, the compliance assessment yielded a Straight Compliance Score of 89.58% and a Weighted Compliance Score of 94.79%.

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**:

- Environmental induction records and registers were not available for review, and no Invasive Alien Plant Control and Eradication Programme was provided, indicating gaps in the implementation and documentation of key EMPr requirements.
- Erosion was observed along the buffer yard boundary, affecting the perimeter fence and site security. Corrective measures are required to stabilise affected areas and prevent further deterioration.



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.