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AUGUST 2025 MONTHLY ECO AUDIT REPORT

IMPOFU CLUSTER WIND ENERGY FACILITY

DEA Reference Numbers:

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



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List of Abbreviations

Abbreviation	Item
DEA	Department of Environmental Affairs
DFFE	Department of Forestry, Fisheries and the Environment
DWS	Department of Water and Sanitation
EA	Environmental Authorisation
ECO	Environmental Control Officer
EO	Environmental Officer
EGP	Enel Green Power
EIMS	Environnemental Impact Management Services (Pty) Ltd
EMPr	Environmental Management Programme
GA	General Authorisation
I&AP	Interested and Affected Party
NC	Non-Compliance
NCR	Non-Compliance Report
NMBMM	Nelson Mandela Bay Metropolitan Municipality
OHL	Overhead Line
MPRDA	Mineral and Petroleum Resources Development Act
WF	Wind Farm

Definitions

Term	Definition
Non-compliance (NC)	Instances where a provision of environmental legislation (national, provincial, or local) and/or condition of an environmental approval (for example, environmental authorisation, water use licence, waste licence, licence in terms of the National Forests Act) or any other legal document issued in terms of environmental legislation is contravened. For the purpose of the monthly ECO audits, it will include contraventions to the provisions of the EA and EMPr.
Incident	Any unplanned event that could, or does, result in harm, damage, and/or environmental pollution or degradation or gives rise to an accident or has the potential to lead to an accident.

Incident management	Incident management is an integral function of risk management and is aimed at reducing the impact of incidents, enabling corrective action to be taken and changed practice to be introduced. It also allows for learning from the incidents that have occurred to prevent similar incidents from happening or to mitigate their impact. This includes the effective communicating, reporting, measurement, recording and investigation of incidents.
NEMA section 30 incident	"Incident" means an unexpected, sudden and uncontrolled release of a hazardous substance, including from a major emission, fire or explosion, that causes, has caused or may cause significant harm to the environment, human life or property.

1 INTRODUCTION

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

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

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

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

1.1 DETAILS OF THE HOLDER

Details of the holder are summarised in **Error! Reference source not found.** below.

Table 1: Details of the holder.

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

BRIEF PROJECT DESCRIPTION

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

Impofu North

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

Impofu East

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

Impofu West

The Impofu West Wind Farm is located entirely within the Kouga Local Municipality, within the Sarah Baartman District Municipality. The Impofu West site is centred on 34°5'28" South latitude and 24°32'53" East longitude and is approximately 14 kilometres (km) north-west of Oyster Bay as taken from the centre point. Initially the Wind Farm was authorised to construct Impofu West Wind Farm, a 168 MW Wind Farm comprised of up to 24 wind turbines. As above, this was revised and is now 112.1MW through 19 turbines. (Refer to **Error! Reference source not found.** for the Impofu Cluster boundaries).

Authorisations, Permit and or Management Plans

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

The below authorisations were obtained for the aforementioned:

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

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

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

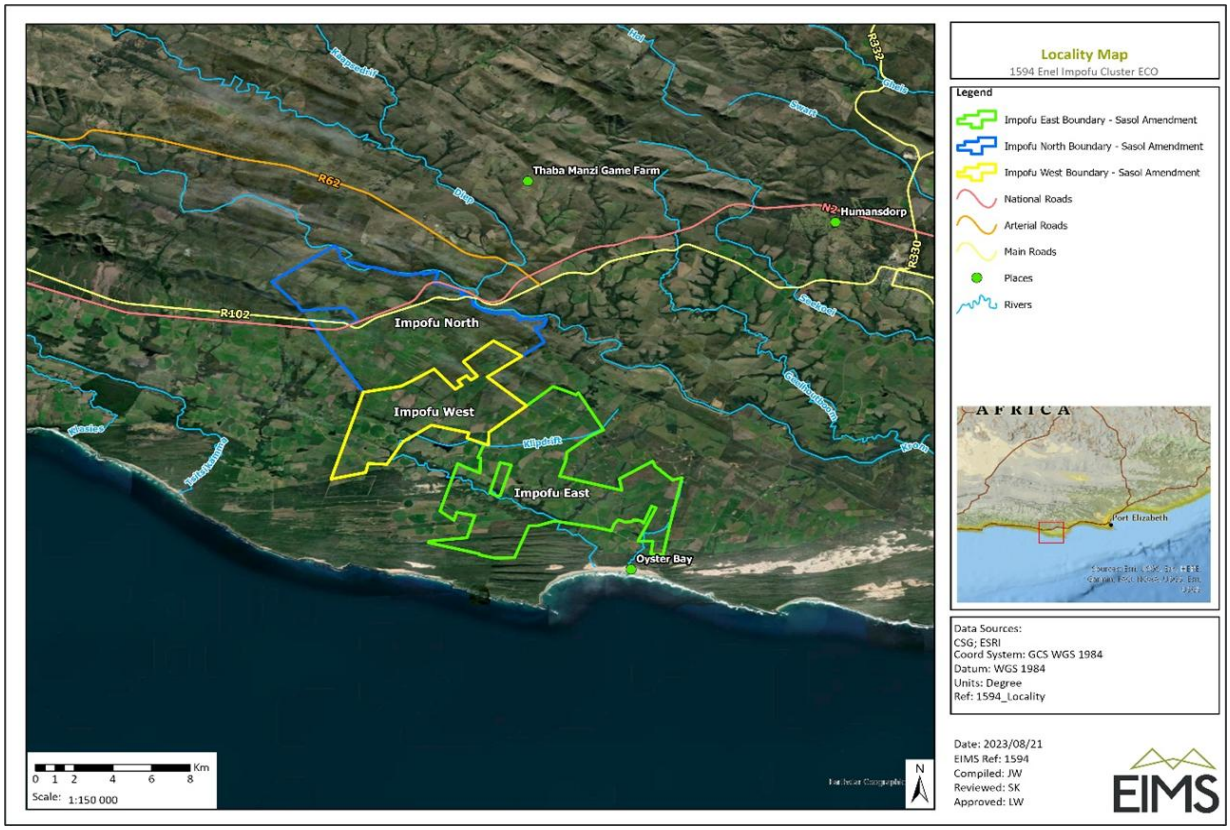


Figure 1: Impofu Cluster boundaries

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

- Turbines: Up to 19 turbines with a hub height from 90m to 130m, and rotor diameter of up to 180m the minimum tip height (ground clearance) will be at least 30m:
- Crane hard stands: One per turbine, with a permanent hardstand 40m x 50m which will remain for maintenance purposes;
- Access and internal roads: The internal gravel roads will be approximately 6m wide with potential side drains. Some sections of these roads would need to the temporary widened up to 12m during construction;
- On-site substation: Each substation is approximately 150 x 75m (11 250m^2) which will occupy the area for operation and maintenance;
- Cables: Each turbine will be connected to the substation via medium voltage cables (~33kV lines). Where feasible the cables will be laid underground in trenches, generally running alongside existing or proposed new internal roads. Where burying of cables is not possible due to technical, geological, environmental or topographical constraints, then burying of cables is not possible due to technical, geological, environmental or topographical constraints, then overhead power lines will be erected;
- Permanent Operational & Maintenance (O&M) buildings: The substation area would house buildings or areas for control, operation, workshop and storage: and,
- Laydown area and site camp: The temporary laydown areas will be approximately 161 200m^2 and the permanent area 52 000m^2 and the temporary site camp of approximately 15,000m^2. An additional 1,000m^2 will be temporarily required for concrete batching.

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

- Turbines: Up to 19 turbines with a hub height from 90m to 130m, and rotor diameter of up to 180m the minimum tip height (ground clearance) will be at least 30m:
- Crane hard stands: One per turbine, with a permanent hardstand 50m x 40m which will remain for maintenance purposes;

- Access and internal roads: The internal gravel roads will be approximately 6m wide with potential side drains. Some sections of these roads would need to the temporary widened up to 12m during construction;
- On-site substation: Each substation is approximately 150 x 75m (11 250m^2) which will occupy the area for operation and maintenance;
- Cables: Each turbine will be connected to the substation via medium voltage cables (~33kV lines). Where feasible the cables will be laid underground in trenches, generally running alongside existing or proposed new internal roads. Where burying of cables is not possible due to technical, geological, environmental or topographical constraints, then burying of cables is not possible due to technical, geological, environmental or topographical constraints, then overhead power lines will be erected;
- Permanent Operational & Maintenance (O&M) buildings: The substation area would house buildings or areas for control, operation, workshop and storage: and,
- Laydown area and site camp: The temporary laydown areas will be approximately 148 800m^2 and the permanent area 48 000m^2 and the temporary site camp of approximately 15,000m^2. An additional 1,000m^2 will be temporarily required for concrete batching.

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

- Turbines: Up to 19 turbines with a hub height from 90m to 130m, and rotor diameter of up to 180m the minimum tip height (ground clearance) will be at least 30m:
- Crane hard stands: One per turbine, with a permanent hardstand 40m x 50m which will remain for maintenance purposes;
- Access and internal roads: The internal gravel roads will be approximately 6m wide with potential side drains. Some sections of these roads would need to the temporary widened up to 12m during construction;
- On-site substation: Each substation is approximately 150 x 75m (11 250m^2) which will occupy the area for operation and maintenance;
- Cables: Each turbine will be connected to the substation via medium voltage cables (~33kV lines). Where feasible the cables will be laid underground in trenches, generally running alongside existing or proposed new internal roads. Where burying of cables is not possible due to technical, geological, environmental or topographical constraints, then burying of cables is not possible due to technical, geological, environmental or topographical constraints, then overhead power lines will be erected;
- Permanent Operational & Maintenance (O&M) buildings: The substation area would house buildings or areas for control, operation, workshop and storage: and,
- Laydown area and site camp: The temporary laydown areas will be approximately 167 400m^2 and the permanent area 54 000m^2 and the temporary site camp of approximately 15,000m^2. An additional 1,000m^2 will be temporarily required for concrete batching.

1.2 PROJECT PROGRESS

The project currently has three (3) contractors, Power Construction (appointed for civil works), Brand Besamandla (appointed for electrical works) and Nordex Energy SA (Pty) Ltd (appointed for Turbine Supply and Assembly). Brand Besamandla has appointed Power Buildings for construction of the Operational and Maintenance (O&M) facilities, Independent Power Producer (IPP) for control building as well as Eskom Building, M&T Solutions for Met Mast installation, and Imvelenhle Consulting and Engineering as well as RenPower for MV cable installation. Nordex has appointed Johnson Crane Hire to provide cranes for tower installation and assembling, Eazi Access for Machine Hire, Tembo for transport and logistics, and Downings Marquees for Marquee Hire. Construction progress meetings are held daily in the morning where environmental aspects and concerns are discussed. HSE meetings are held once weekly. Construction of the following is underway:

- North substation;
- East substation;
- Powfontein substation;
- West substation;
- MV reticulation;

- Tower pre-assembly, installation, and assembling;
- Stringing of internal overhead lines;
- Topsoil reinstatement;
- Earthworks.

2 DETAILS OF THE ECO

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

2.1 EXPERTISE OF THE ECO

Ms Sisipho Mpotulo is an environmentalist who holds a B. Sc Hons. degree of Botany, specializing in Ecology and Environmental Management, and completed a B. Sc degree in Environmental Sciences. She holds a Google Project Management professional Certificate which has been critical as a leader in her recent roles. She brings a comprehensive understanding of environmental legislation, sustainable practices, and regulatory compliance. Sisipho is a candidate natural scientist with the South African Council for Natural Scientist (SACNASP) (#161422) as well as a candidate Environmental Assessment Practitioner with the Environmental Assessment Practitioners Association of South Africa (EAPASA) (#2024/8125).

2.2 DECLARATION OF INDEPENDENCE

*I, **Sisipho Mpotulo**, declare that –*

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

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

Signature: 

3 SCOPE, PURPOSE AND OBJECTIVE OF THE AUDIT

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

the provisions of the requisite EA and EMPr, related permits as well as licences. This report is prepared in accordance with Appendix 7 of the 2014 EIA Regulations (as amended). The objective of the environmental audit report is to:

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

4 AUDIT METHODOLOGY

4.1 PROCEDURE FOR THE AUDIT

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

During the audit, the ECO requested the following information:

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

4.2 EVALUATION CRITERIA USED DURING THE AUDIT

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

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

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

4.3 DOCUMENTATION REVIEW

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

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

- The 2nd amendment of the EA for the 182MW Impofu North Wind Energy Facility (reference Number: 14/12/16/3/3/2/1102/AM2) was approved by DFFE on the 6th of December 2022. This was read together with the EA dated 25 September 2019 and the 1st amendment dated 11 November 2020.
- The 2nd amendment of the EA for the 168MW Impofu West Wind Energy Facility (reference Number: 14/12/16/3/3/2/1103/AM2) was approved by DFFE on the 6th of December 2022. This was read together with the EA dated 23 September 2019 and the 1st amendment dated 16 November 2020.
- The 2nd amendment of the EA for the 189MW Impofu East Wind Energy Facility (reference Number: 14/12/16/3/3/2/1104/AM2) was approved by DFFE on the 6th of December 2022. This was read together with the EA dated 25 September 2019 and the 1st amendment dated 16 November 2020.
- The 3rd amendment of the EA for the 189 MW Impofu East Wind Energy Facility (reference Number: 14/12/16/3/3/2/1104/AM3) was approved by DFFE on the 24th of February 2025.
- The 3rd amendment of the EA for the 182MW Impofu North Wind Energy Facility (reference Number: 14/12/16/3/3/2/1102/AM3) was approved by DFFE on the 07th of March 2025.
- The 3rd amendment of the EA for the 168MW Impofu West Wind Energy Facility (reference Number: 14/12/16/3/3/2/1103/AM3) was approved by DFFE on the 07th of March 2025.
- Buffer yard and concrete batching plant for the Impofu Wind Cluster (reference Number: 14/12/16/3/3/1/2776) was approved on the 24th of October 2023.
- Environmental Management Programme (EMPr) revision five and the site layout map was approved by the DFFE on the 13th of June 2023.
- Water Use Authorisation (General Authorisation – GA) for abstraction (Section 21a) of water for industrial use of two boreholes was approved on the 29th of September 2021 for the Impofu North Wind Farm.
- Water Use Authorisation (GA) for Section 21 (c, i and g) was approved on the 21st of September 2021 for the Impofu North Wind Farm.
- Water Use Authorisation (GA) for abstraction (Section 21a) of water for industrial use of two boreholes was approved on the 29th of September 2021 for the Impofu West Wind Farm.
- Water Use Authorisation (GA) for Section 21 (c, i and g) was approved on the 06th of October 2021 for the Impofu West Wind Farm.
- Water Use Authorisation (GA) for abstraction (Section 21a) of water for industrial use of two boreholes was approved on the 29th of September 2021 for the Impofu East Wind Farm.
- Water Use Authorisation (GA) for Section 21 (c, i and g) was approved on the 06th of October 2021 for the Impofu East Wind Farm.
- Water Use Authorisation (GA) for Section 22 (1) (a) (iii) was approved on the 1st of November 2019 for the abstraction of water from a registered dam for the wind farms.
- Mineral and Petroleum Resources Development Act 28 of 2002 (MPRDA) Section 53 Consents for the Impofu West, North and East Wind Farms were received on the 3rd and 16th of September 2019, respectively.
- Water Use Authorisation (GA) for Section 21 (a, c and i) was approved on the 26th of January 2024 for the Impofu West Wind Farm.

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

Monitoring documents and registers

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

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

Waste Management

Domestic/General Waste

Waste separation is encouraged for recycling purposes where possible. Power Construction has appointed an independent service provider, Luvan Plant Hire (Pty) Ltd for collection and disposal of general waste at registered landfill site, Humansdorp Landfill site (permit number: 12/9/11/P53) in Kouga Local Municipality. A total of 18 m^3 of general waste was collected from site and disposed at the landfill site during the current reporting period. Waste disposal certificates are kept in the environmental file for records. Isiviko Construction (Pty) Ltd, Power Buildings subcontractor dispose waste at Humansdorp landfill site using their bakkies. During the current reporting period, a total of 5.4 m^3 of general waste was disposed of. Brand Besamandla disposes waste at Power Construction waste management area. A total of 1.6 m^3 of wood waste was collected for recycling from Brand Besamadla work areas. The ECO advised that the safe disposal certificates be filed for auditing and record retention purposes.

Nordex has appointed an independent service provider, Zumbe Services (Pty) Ltd who has appointed Luvan Plant Hire (Pty) Ltd for collection and disposal of general waste at registered landfill site, Humansdorp Landfill site (permit number: 12/9/11/P53) in Kouga Local Municipality. A total of 101.4 m^3 of general waste, including wood waste, was collected from site, and disposed at the landfill site during the current reporting period.

Hazardous Waste

Power Construction has appointed independent service provider, 'Extreme Projects' to collect, transport and dispose of hazardous waste at a registered hazardous landfill facility. Extreme Projects (registration number: 2011/05) transports hazardous waste to Aloes II Waste Treatment Facilities (Licence Number: 12/9/11/L624/1). The same service provider is used by Nordex. There was no hazardous waste disposed of by Power during the current reporting period. A 350-litre drum of waste oil was disposed of by Nordex at 'AB Oil Recycling', in Despatch. A total of 12 m^2 of solid hazardous waste was disposed of by 'Extreme Projects'.

Sewage Waste

Power Construction (Power) appointed a service provider for chemical toilets, Bidvest Toilet Hire (Bidvest). Bidvest service, collect and dispose effluent at a registered treatment plant (Fishwater Flats Wastewater Treatment Works- licence number: 12/9/11/L433/1) at Nelson Mandela Bay Municipality. During this reporting period, Bidvest collected 2.82 m^3 of effluent for disposal from servicing toilets, a decrease from the previous reporting period due to phased demobilization of ablution units. The conservancy tank was serviced four times

during the current reporting period, with Sewage works' collecting a total of 40 m^3 of effluent. Waste disposal certificates are available in the contractor's environmental file.

At the substations (North, East, West, and Powfontein), Brand Besamandla, Power Buildings, Imvelenhle, M&T Solution and Renpower also appointed a service provider, Bidvest to service, collect and dispose effluent at a registered treatment plant (Fishwater Flats Wastewater Treatment Works with Licence number: 12/9/11/L433/1 and permit number: T2021/005) at Nelson Mandela Bay Municipality. The contractors make use of chemical toilets that are serviced twice a week. A total of 4.08 m^3 of effluent was collected for disposal during the current reporting period.

The conservancy tank at Nordex site camp was serviced twice during the current reporting period by Bidvest, collecting a total of 16,88 m^3 of effluent for disposal. Johnson Crane Hire has appointed a service provider, Women of Strength to provide ablution facilities who has appointed Bidvest to collect and dispose effluent at a registered treatment plant (Fishwater Flats Wastewater Treatment Works with Licence number: 12/9/11/L433/1 and permit number: T/2021/005). A total of 7.2 m^3 of effluent was disposed during the current reporting period.

Health Care Risk Waste

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

Water Consumption

Power, Besamandla, and Nordex have reduced water extraction to two farm boreholes, Steynberg and Biggs. Water from the boreholes is used for dust suppression of access roads as well as other work areas and to flush toilets at the site camp. Power had stopped abstracting water from Oyster Bay Dam. However, due to low yield and high demand from Nordex, a total of 208 m^3 was extracted during the current reporting period. A valid GA is still in place. Based on the information provided to the ECO, borehole water abstraction monitoring results between the 19th of July 2025 and 23th of August 2024 are as follows:

Farm name	June (m^3)	July (m^3)	August (m^3)	Total abstracted from 11 January to 09 August 2025 (m^3)
Steynberg	681	250	1 029	14 634
Biggs	3 590	194	3	5 043
Cilliers	3 078	767	0	18 529
Vermaak	325	0	0	5 710
Masterson	326	0	0	9 983
Total (m^3)	**7 940**	**444**	**1 032**	

The water from the boreholes is also used for dilution of the bio-security cleaning agent for the Foot and Mouth Disease on farms. At the site camp, the filtration system previously used for potable water is no longer in use, and the contractor is now purchasing drinking water. Nordex purchases water for consumption at Humansdorp.

Water Use Authorisations Compliance Monitoring

The water use licence (WUL) authorisations were granted in terms of GAs by the Department of Water and Sanitation (DWS) in terms of the National Water Act 36 of 1998 for the following water uses, Section 22(1) (a) (iii): a person may only use water without a licence if that water is permissible under schedule I; if that water use is permissible in terms of a general authorisation issued under section 39. The Water Use is for the abstraction of water from a registered dam that was used during construction and for disposing sewage waste

into the conservancy tank at the site camp. Abstraction of water from boreholes commenced and the contractor regularly records the water used. Registered water uses are section 21 (c, i, and g), for Impofu North there are 41 water uses, Impofu West with 50, and Impofu East with 46.



Figure 2: Water for construction stored in a water tank at Powfontein substation.

4.4 SITE ASSESSMENT

The audit was conducted on the 19th of August 2025. Activities for the current reporting period include the following:

- **Foundations**: WTG recess and duct trenching, concrete blinding and recess pouring, dewatering WTG excavations, foundation grouting as well as rigid inclusions remedial works.
- **Crane pads and platforms**: Construction of blade fingers, grouting activities, LG configuration and installation, installation of nacelle.
- **Access Roads**: Maintenance of access roads, internal road gravel importation and roadworks, stormwater installations, culvert installations, stormwater stone pitching for trimming and drainage, stormwater V-Drain excavations as well as trapezoidal drains.
- **Other activities**: Removing stockpiles and hauling excess material to spoil, importing wearing course material, topsoil trimming and reinstatement, fence repairs, trimming and finishing of borrow pit.

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

- **West Substation**:
    - Herbicide application in preparation for placement of yard stone.
    - Pulling of LV cable in the Relay room.
    - Tiling and grouting in the office building.
    - Installation of alarms and smoke detectors.
    - Backfilling and compaction of septic tanks.
    - Brickwork at Warehouse.
    - Perimeter and internal fence installation.
    - Installation of perimeter kerbs.
- **Powfontein Substation**:
    - Herbicide application in preparation for placement of yard stone.
    - Perimeter fence installation.
    - Platform paving ongoing.
    - Crossing of cover trenches.
    - Pulling of cable for the equipment in the yard and the control room.
    - Glanding of cables in the control room.
    - Excavation of trenches.
- **North Substation**:
    - Herbicide application in preparation for placement of yard stone.
    - Road access kerbing.



- Distribution board wiring.
- Pulling of MV Cable into the IPP building.
- Transformer (TRFR) fence post excavation.
- Stringing HV transformer side.
- Construction of drainage system.

- **East Substation**:
  - Plastering at the hazardous waste building.
  - Installation of ceiling and tiling in the O&M.
  - Installation of cable ladder and mesh wire.
  - Installation of cables on panels.
  - Subsoil stormwater installation.
- **MV Cable installation**
  - Cable installation and backfilling at North, East, and West Wind Farm.
- **Met Mast**
  - Cable installation and backfilling at the West Wind Farm.

Nordex is currently undertaking the following activities:

- Pre-assembly of internals, pre-loading milk run trucks, and transportation of keystones;
- Pre-assembling of concrete tower section at Impofu East and West;
- Tower assembly and grouting at Impofu East and West;
- Preparation of a hub, Nacelle and blades at Impofu West and East; and
- Post tensioning at Impofu North.



Figure 3: Installation of stormwater pipe at East substation.



Figure 4: MV Reticulation at West Wind Farm.



Figure 5: Healthy vegetation regrowth through the soil saver on embankment at North substation



Figure 6: Application of yard stone following the application of herbicide at North substation.



Figure 7: Grout and other hazardous material stored at the newly constructed hazardous store at West substation. This area was without an MSDS.



Figure 8: Rainwater that is collected in the fuel storge tank bund at Power site camp.



Figure 9: WTG 6 with painted blades.



Figure 10: Bio-security for Foot-and-Mouth Disease (FMD) continues.



Figure 11: Generator used for de-watering excavation placed on a drip tray at East substation.



Figure 12: Use of geotextile at WTG E13 to mitigate soil erosion.



Figure 13: The heritage area at Impofu East was inspected and showed no signs of disturbance.



Figure 14: Construction of a catchpit at Impofu Road East 19.



Figure 15: Delivery of keystones to WTG E14.



Figure 16: Mobile toilets at WTG W9 secured using wooden blocks.

5 RESULTS OF THE AUDIT / LEGAL COMPLIANCE

EIMS have been appointed to undertake legal compliance audits in terms of the EA, GA and EMPr of the Impofu Wind Farms and associated infrastructure. The results of the monthly ECO Audit are provided in this section of the report. The compliance summary, areas of good compliance, areas of concern and areas of non-compliance are provided in sections **Error! Reference source not found.**, 5.2, **Error! Reference source not found.** and 5.4 respectively.

5.1 COMPLIANCE SUMMARY

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

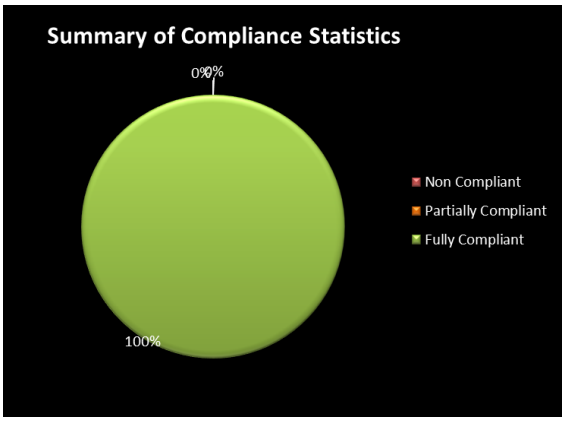


Figure 17: Summary of compliance with the requirements of the Impofu West EA (Power Construction).

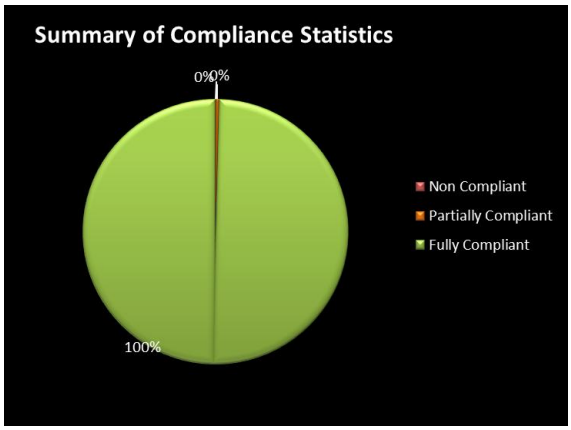


Figure 18: Summary of compliance with the requirements of the Impofu West EMPr (Power Construction).

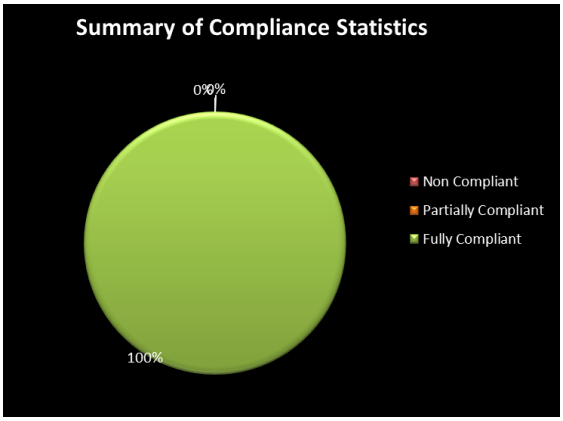


Figure 19: Summary of compliance with the requirements of the Impofu East EA (Power Construction).

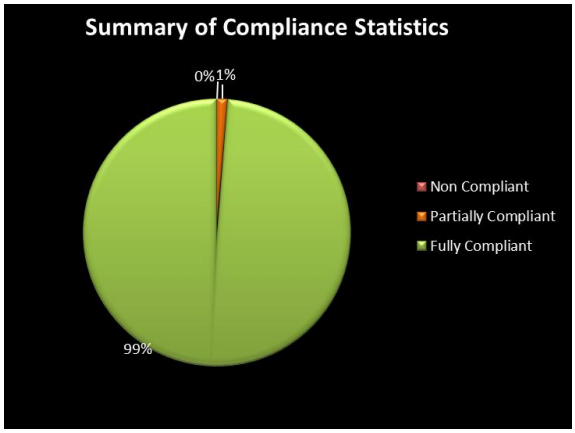


Figure 20: Summary of compliance with the requirements of the Impofu East EMPr (Power Construction).

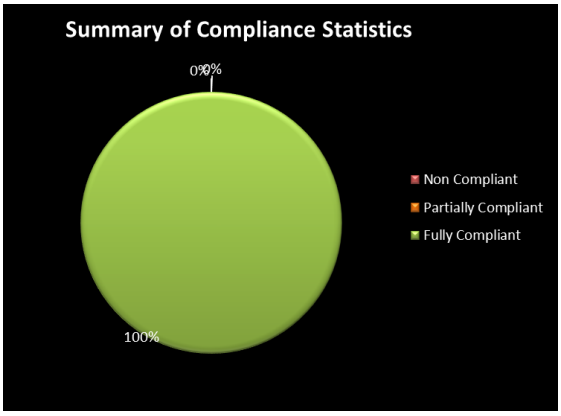


Figure 21: Summary of compliance with the requirements of the Impofu North EA (Power Construction).

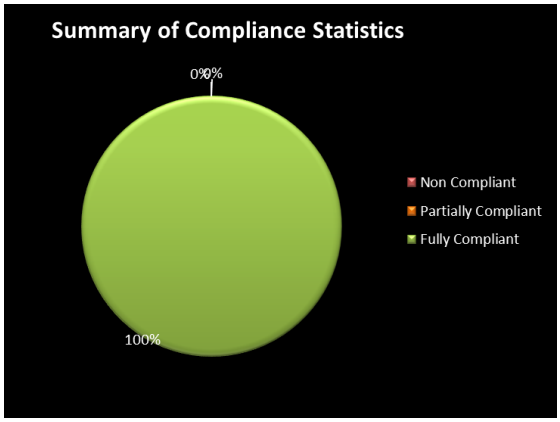


Figure 22: Summary of compliance with the requirements of the Impofu North EMPr (Power Construction).

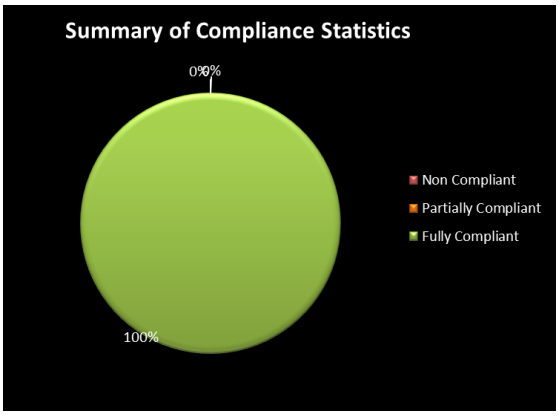


Figure 23: Summary of compliance with the requirements of the Impofu North EA (Nordex).

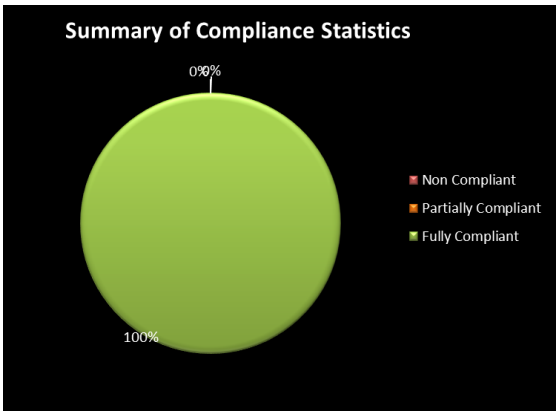


Figure 24: Summary of compliance with the requirements of the Impofu North EMPr (Nordex).

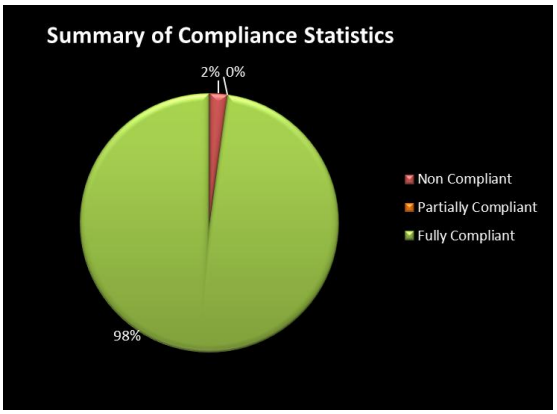


Figure 25: Summary of compliance with the requirements of the Impofu West EA (Nordex).

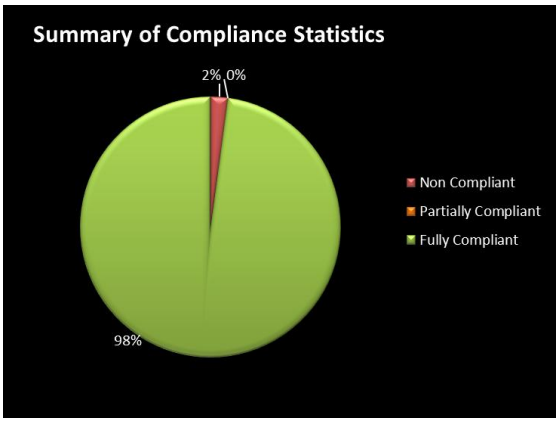


Figure 26: Summary of compliance with the requirements of the Impofu West EMPr (Nordex).

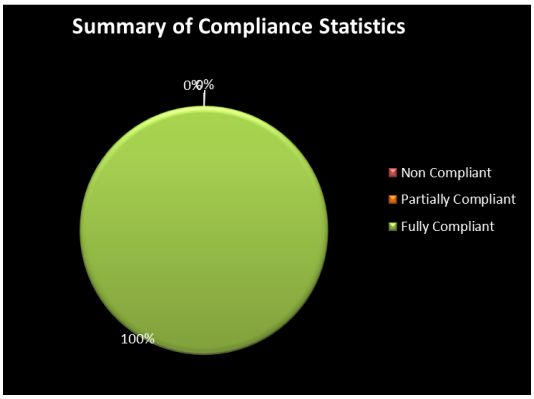


Figure 27:Summary of compliance with the requirements of the Impofu East EA (Nordex).

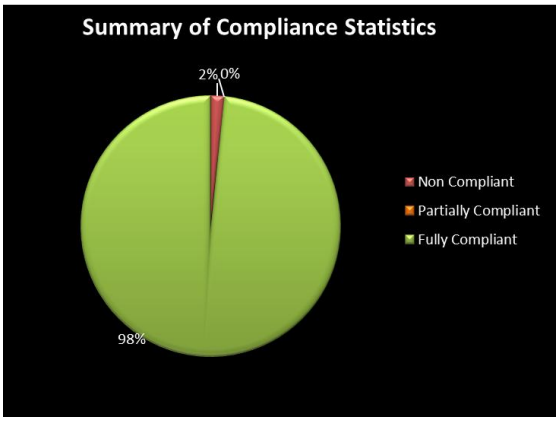


Figure 28: Summary of compliance with the requirements of the Impofu East EMPr (Nordex).

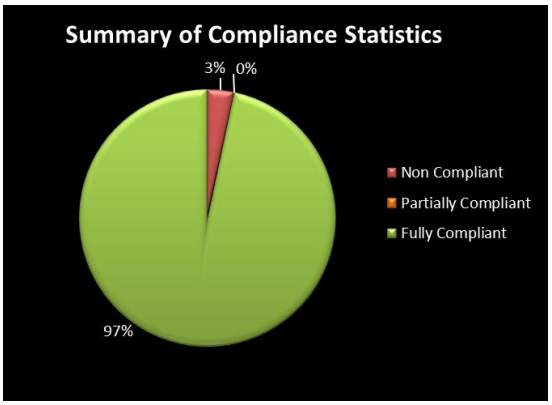


Figure 29: Summary of compliance with the requirements of the Buffer Yard EA (Nordex).

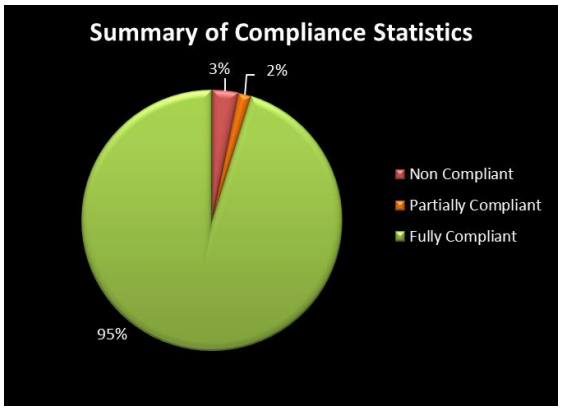


Figure 30: Summary of compliance with the requirements of the Buffer Yard EMPr (Nordex).

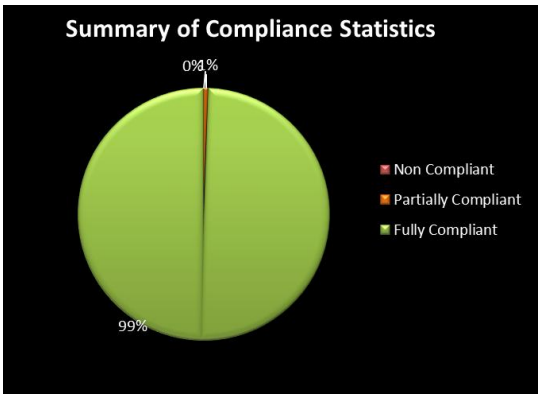


Figure 31: Summary of compliance with the requirements of the Substations EMPr (Brand Besamandla).

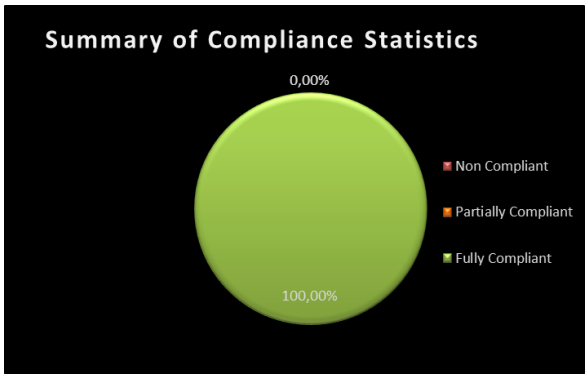


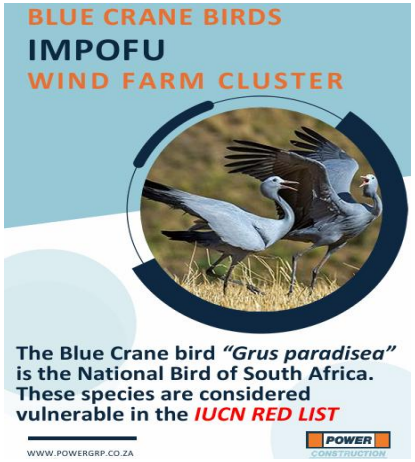
Figure 32: Summary of compliance with the requirements of the Water Use Authorisations (GA) (Power Construction).

5.2 GOOD COMPLIANCES

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

Location	Category	Responsible Party	Description	Photo Reference
North Substation	Pollution Prevention	Brand Besamandla	Cement mixing was maintained on impermeable surface, inside mixing trays.	 Figure 33: Concrete mixing in mixing trays to prevent pollution. Managing where the cement blows is a challenge.
North Wind Farm	Gate Maintenance	Power Construction	Installation of new gates at farmer requests and maintenance of cattle grid was observed at the North Wind Farm.	 Figure 34: Gate maintenance at Impofu North.

Location	Category	Responsible Party	Description	Photo Reference
Powfontein substation	Waste segregation	Brand Besamandla	There was a notable increase in the wire waste at Powfontein substation. This waste was neatly stored in a labelled waste storage area.	 Figure 35: Wire waste neatly stored at Powfontein substation.
Site camp	Housekeeping	Power Construction	Good housekeeping practices are maintained at the site camp. More frequent upkeep of the wash bay is recommended.	 Figure 36: Good housekeeping maintained at Power site camp.

Location	Category	Responsible Party	Description	Photo Reference
Buffer Yard	Dust control	Nordex	Dust suppression by the water truck was observed at the buffer yard.	 Figure 37: Dust suppression was noted at the Buffer Yard.
Impofu Wind Farm	Environmental Awareness	Power Construction	A lot more Blue Crane birds were noted at the wind farm and a poster was shared with the site and client personnel.	 Figure 38: Blue Crane Poster for Environmental Awareness at Impofu Wind Farm.

5.3 AREAS OF CONCERN

Five (05) new areas of concern were identified during the current reporting period.

- The topsoil stockpiled at Powfontein substation's laydown area appeared to be diminishing due to weathering and erosion, albeit slowly. Monitoring of these stockpiles is recommended.
- The laydown area at West substation and the main site camp were not labelled. This risking a tripping hazardous and poor management of the laydown.
- Wood waste management at the Impofu Wind farm substations and the buffer yard is accumulating faster than disposal. The current waste collector uses a small trailer and appears with overstretched resources.
- Waste management and housekeeping at the buffer yard happens every other day. As a result, waste mixing in the area has not improved and the hazardous waste skip is kept open for convenience, risking more waste mixing.
- There was concerning water and wastewater management at the Nordex work area where horizontal grouting was taking place. Better containment of wastewater and reuse of water is recommended.

Previously raised areas of concern are being monitored closely. However, broken or open drip trays continue to be used on site. Areas of concern have the potential to become non-compliances or incidents if not adequately considered or addressed, where required.





Figure 39: Eroded soil stockpiles noted at Powfontein substation.





Figure 40: Unlabelled laydown areas risking tripping hazards.





Figure 41: Wood waste reduced at East and Powfontein substations.





Figure 42: Housekeeping at the buffer yard is a concern.





Figure 43: Water use and housekeeping for grouting activities could improve.

5.4 NON-COMPLIANCES

Eleven (11) new non-compliances were raised during this reporting period, six (6) of which have been closed. Areas of non-compliances can be escalated to Non-Compliance Report (NCR) if not adequately addressed within the timeframes agreed to.

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

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

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
071	EMPr 5.8 **For Brand Besamandla**	All measures regarding waste management must be undertaken using an integrated waste management approach; The waste collection site must be maintained in a clean and orderly manner; Bins must be emptied regularly;	Overfilled waste bins were observed during site inspection. It was said that the bins were full due to the chicken parade that was done earlier, and waste was yet to be disposed at the main site camp.	Dispose of the waste from the planned litter-picking, chicken parade as soon as practicably possible to avoid any spreading of waste.	**Closed Out/ Corrected** The waste accumulation was managed better by the following site inspection.	 Figure 44: Full waste bins at East substation.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
072	EMPr 5.14 **For Brand Besamandla**	Where mobile chemical toilets are required, the following must be ensured: a) Toilets are secured to the ground to prevent them from toppling due to wind or any other cause;	One toilet was found not anchored at East substation. The contractor emphasized that the frequent rainfall and soil type was a challenge in securing the toilets.	The security of the toilet anchors should constantly be monitored, given the weather challenges.	**Closed Out/ Corrected** The toilet was immediately anchored immediately and .	 Figure 45: Toilet anchor becomes loose when it rains, requiring frequent monitoring.
073	EMPr 5.17 **For Brand Besamandla**	Provision must be made for refuelling at the storage area by protecting the soil with an impermeable groundcover. Where dispensing equipment is used, a drip tray must be used to ensure small spills are contained;	A broken drip tray was used for placing hazardous chemicals at North substation.	Monitor drip tray integrity constantly.	**Closed Out/ Corrected** The hazardous chemicals were placed on an intact drip tray and the damaged drip immediately removed.	 Figure 46: Boken drip tray used for HCS placement at North substation was replaced immediately.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
074	EMPr 5.3.4.2 **For Power Construction**	Should portable/chemical toilets be used then these shall be used and maintained in such a way that they do not cause water or other pollution: • Toilets shall be adequately secured to the ground to prevent them from toppling due to wind or any other cause.	Two portable toilets were not anchored at the security entrance along RE19.	Toilets should be adequately secured to the ground to prevent them from toppling due to wind or any other cause.	**Open/ Uncorrected**	 Figure 47: Portable toilet was observed not secured to the ground.
075	EA 108 **For Power Construction** EMPr 5.3.9.14 **For Power Construction**	Leakage of fuel must be avoided at all times and if spillage occurs, it must be remedied immediately. Contaminated soil and material shall be stored in bags or sealed and labelled drums in the designated hazardous waste area of the site and disposed of in accordance with Section 0. Any contaminated soil that cannot be removed is to be treated in situ as determined by the ECO.	Small diesel spillages were noted close to the main diesel tank at the site camp.	Where OilCap is used for hydrocarbon spill remediation, reapplication is recommended to ensure effective result.	**Closed Out/ Corrected** OilCap was applied to the observed spills.	 Figure 48: Minor diesel spillages were noted at Power site camp.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
076	EMPr 5.3.16.1 **For Power Construction**	All reasonable measures shall be taken to limit erosion. Any runnels or erosion channels developed during the construction period or during the vegetation establishment period shall be backfilled and compacted, and the areas restored to a proper condition. Stabilisation of cleared areas to prevent and control erosion shall be pro-actively managed by the Contractor.	Intense rill erosion was noted at WTG E5. Erosion channels around other WTG's continue to establish.	All reasonable measures shall be taken to limit erosion.	**Closed Out/ Corrected** Erosion control was done through the application of hessian weave and stormwater channelling through chutes.	 Figure 49: Rill erosion around WTG embankment was mitigated with hessian weave and additional stormwater channelling.
077	EMPr 5.19 **For Brand Besamandla**	Concrete mixing must be carried out on an impermeable surface; Batching plants areas must be fitted with a containment facility for the collection of cement laden water. Dirty water from the batching plant must be contained to prevent soil and groundwater contamination; A washout facility must be provided for washing of concrete associated equipment. Water used for washing must be restricted;	Cement-laden water at the East Substation was observed on bare soil near the mixing area, located toward the edge of the platform. This poses an ongoing risk of soil contamination. The issue has been repeatedly noted during previous site inspections, and the contractor has indicated that no alternative	Dirty water from the batching plant must be contained to prevent soil and groundwater contamination.	**Open/ Uncorrected**	 Figure 50: Cement-laden water on bare ground at the mixing area was noted and is concerning, although there is no runoff.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
			management measures are possible for this activity.			
078	EA 108 **For Brand Besamandla** EMPr 5.17	Leakage of fuel must be avoided at all times and if spillage occurs, it must be remedied immediately. Provision must be made for refuelling at the storage area by protecting the soil with an impermeable groundcover. Where dispensing equipment is used, a drip tray must be used to ensure small spills are contained;	At West substation laydown, HCS containers were placed on a shattered drip tray. The storeman only removed two of the containers and did not finish correcting the deviation. Additionally, a diesel bowser that belongs to Tswalec was without a drip tray. Consequently, there was evidence of a spillage.	Should any soil become contaminated by oil or fuel spills then the soil shall be removed. Alternatively, any contaminated soil that cannot be removed is to be treated in situ as determined by the ECO.	**Open/ Uncorrected**	 Figure 51: Risk of fuel leakage onto bare soil was noted due to inadequate drip tray provision.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
079	EMPr 5.3.9.10 **For Nordex** EMPr 5.3.15.9 EMPr 5.3.15.12	Pollutants, or water contaminated with any pollutants (e.g. detergent, cement, fuels and oils) shall be disposed of in accordance with Section 0. Hazardous waste shall be stored in sealed and labelled drums, which shall be situated on a smooth impermeable surface (concrete or 250 micrometre (µm) plastic (plastic must have at least a 5 cm layer of sand on top to prevent damage and perishing)) within an earth bund. The impermeable lining shall extend to the crest of the bund and the volume inside the bund shall be 120% of the total capacity of all the storage tanks/bowsers (110% statutory requirement plus allowance for rainfall). Should any liquid waste (e.g. spent oils, fuels and hazardous chemicals; cement-laden water or contaminated water from wash slab and repair areas, batching areas, Hazardous Chemical Substance and hydrocarbon storage areas; water containing waste and domestic liquid waste) be generated then the	Liquid hazardous waste was noted in an unlabelled plastic container with an opening on top.	The liquid waste shall be properly stored in a labelled, sealable drum in the designated bunded area.	**Open/ Uncorrected**	 Figure 52: Liquid hazardous waste improperly stored at the Nordex warehouse.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		liquid waste shall be stored in sealed and labelled drums or approved containers for such purposes in the designated hazardous waste area of the site until it is disposed of at appropriately licensed wastewater or hazardous waste disposal facilities as approved by the Contract Manager and ECO.				
080	EMPr 5.3.9.2 **For Nordex** EMPr 5.3.9.10 **For Nordex**	The relevant Material Safety Data Sheets (MSDSs) for all Hazardous Chemical Substances on site shall be readily available. Procedures detailed in the MSDSs shall be followed in the event of an emergency situation. Pollutants, or water contaminated with any pollutants (e.g. detergent, cement, fuels and oils) shall be disposed of in accordance with Section 0.	Spillage of grout wastewater was noted at WTG W9 during horizontal grouting. This occurred when the team was cleaning grout pump and poured excess wet grout into a porous sack.	Spillage on permeable surfaces shall be prevented, and cement laden water/runoff shall be collected and disposed of as water containing waste. Contaminated water shall be disposed of as water containing waste.	**Closed Out/ Corrected** According to the issued incident flash report, spill runoff was contained and the grout allowed to dry. Concrete residues were removed for disposal.	 Figure 53: Grout wastewater spillage noted at ETG W9.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
081	EA 111 **For Nordex** EMPr 5.3.9.3 **For Nordex**	Hazardous substances must not be stored where there could be accidental leakage into surface or subterranean water. If potentially Hazardous Chemical Substances are to be stored on site, then: • Hazardous Chemical Substances shall be stored in appropriate containers which are clearly labelled and sealed. • Hazardous Chemical Substance containers shall be situated on a smooth impermeable surface (concrete or 250 micrometre (µm) plastic (plastic must have a minimum of a 5 cm layer of sand on top to prevent damage and perishing)) within an earth bund. The impermeable lining shall extend to the crest of the bund and the volume inside the bund shall be 120% of the total capacity of all the storage	One unlabelled HCS container was not placed on an impermeable surface at the buffer yard. This was immediately corrected, however the container remained unlabelled as it was unknown whether it was waste or useful material.	Hazardous Chemical Substances shall be stored in appropriate containers which are clearly labelled and sealed. Hazardous waste shall be stored in the designated hazardous waste area. The same applies for hazardous material.	**Open/ Uncorrected**	 Figure 54: Unlabelled HCS containers noted at the Buffer Yard.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		tanks/bowsers (110% statutory requirement plus allowance for rainfall).				

5.5 NON-COMPLIANCE REPORTS

Non-Compliance Reports (NCRs) are issued to the project or relevant contractor if the recorded NCs are not addressed in the agreed timeframes. One (01) new NCR that was issued to Nordex by the ECO on the 28th of August 2025. This was issued for the repeated non-conformance of improper storage of hazard chemical substances at the warehouse area.

5.6 AVIFAUNAL MONITORING

Avifaunal monitoring was conducted by Jon Smallie from WildSkies Ecological Services (Pty) Ltd on the 24th of June 2025. The survey methods were as follows:

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

The following observations were made during the monitoring:

- The nest area was approached on foot, which gave good visibility of the broader area – so as to detect any eagles flying away.
- On arrival two vervet monkeys were at the nest. This is significant for two reasons: firstly it was an indication that an eagle was not around in the nest vicinity (as monkeys are a prey species and would not approach an eagle); and secondly the monkeys may have 'vandalised' the nest itself.
- The farmer reported that he has seen the eagles around – but this does not confirm any breeding or breeding attempt taking place.

Based on the above information, it is concluded that breeding is not currently active at the nest in the 2025 season. A second survey will be conducted later in the season (Sep-Oct) to obtain more certainty. It should be noted that Martial Eagles sometimes breed only every second year, so this is not unusual.

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

- In 2019 a pair of eagles successfully raised a chick at the nest (WildSkies recorded a juvenile in the nest vicinity).
- In 2020 landowners reported seeing a juvenile in the area indicating possible breeding, although it may have been the 2019 youngster.
- In 2021 it was concluded that the nest was used, although could not confirm a fledged young eagle.
- In 2022 it was concluded that no breeding took place.
- In 2023 there was no information.
- In 2024, breeding took place, possibly with a young bird fledged successfully.
- In 2025 to date, no breeding has taken place.

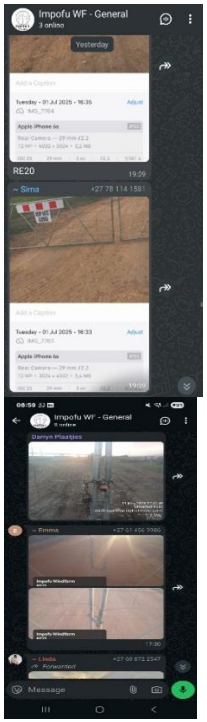
This is a fairly typical timeline for Martial Eagle breeding. These large eagles do not always breed every year, sometimes skipping a year. Importantly this breeding territory appears to have been occupied consistently for six years (2019 – 2025).

5.7 STATUS OF NON-COMPLIANCES REPORTED DURING PREVIOUS REPORTING PERIODS

This section provides the status of the non-compliances that were raised during the previous ECO Audits.

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

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
035	EMPr 5.2.1.38	The contractor must supply the appointed archaeologist with the construction programme at least 4 weeks before construction starts to ensure the monitoring can be properly planned.	The contractor shares the construction programme with the EA Holder on regular basis. However, this programme was not shared with the ECO and/or appointed archaeologist resulting in construction works being undertaken in areas that required specialist monitoring in the absence of the specialist.	The archaeologist subsequently visited the site for monitoring. The ECO is awaiting finalisation of the specialist report and recommendations from the provincial authority in this regard.	**Work in Progress** The archaeologist submitted the report findings to SAHRIS, and opened a heritage crime case against the client. EGP representative also formally responded to the claims and is currently awaiting feedback.	N/A

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
048	EMPr 5.4.1.2 **For both Brand Besamandla and Nordex** EMPr 5.4.2.1 **For both Brand Besamandla, and Nordex**	The Contractor shall agree the detailed access routes and requirements to the development sites, turbine locations and pylon positions with the relevant landowner, specifically adhering to gate management protocols of each landowner/ authorised representative. Existing gates shall be used wherever possible when traversing private property to access the site. •A photographic record of the existing gates shall be kept, and the gates reinstated to their former status once no longer used for construction purposes. •Existing gates that were locked shall remain locked once access is gained, unless otherwise agreed with the landowner. •Under no circumstances are existing fences/gate locks to be cut without prior approval from the landowner/authorised representative.	Landowners have been complaining about contractors not adhering to gate management. Gates management has not been done properly, gates have been reported left open, and cows end up mixing.	The contractor should always adhere to landowners' gate management protocols and ensure that all gates are closed when they leave site after a shift.	**Work in progress** Contractors send photographs before and after shift as proof that gates are not left open. This procedure is reported to be working well but farmers are still complaining about gates being left open.	 Figure 55: Contractors send photographs before and after shift as proof that gates are not left open.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
066	EMPr 7.1 Objective 04 and 12 **For Nordex**	Drip trays or any form of oil absorbent material must be placed underneath vehicles/machinery and equipment when not in use. Appropriately contain any generator diesel storage tanks, machinery spills (e.g., accidental spills of hydrocarbons oils, diesel etc.) in such a way as to prevent them leaking and entering the environment.	Drip tray was not placed under a generator and truck at the buffer yard.	The contractor should ensure that drip trays are placed under parked trucks. The contractor should strive to eliminate this behaviour completely and not leave housekeeping duties for end of shift.	**Closed-Out/ Corrected** Generator has been placed on a drip tray.	 Figure 56: Generator was placed on a drip tray at the Buffer Yard.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
068	EMPr 5.3.12.5 **For Nordex**	All vehicles and plant shall be provided with a suitably sized service pan/drip tray to be used to effectively trap fuel leaks in the event of a breakdown. • Drip trays shall be provided for all plant including stationary plant (such as compressors) and for "parked" plant (such as scrapers, loaders or any vehicle).	**Repetitive finding**: Drip trays were not placed under a generator and mobile diesel bowser at the buffer yard.	The contractor should ensure that drip trays are placed under parked plant. The contractor should strive to eliminate this behaviour completely and not leave housekeeping for the end of the day.	**Open/ Uncorrected** The proper use of drip trays a the buffer yard is still lacking. A keystone delivery truck was noted with a drip tray and refuelling of a diesel bowser was without a drip tray.	  Figure 57: Inadequate use of structurally intact drip trays noted at the Buffer Yard.
069	EA 108 For **Nordex EMPr** 5.3.9.16 **For Nordex**	Leakage of fuel must be avoided at all times and if spillage occurs, it must be remedied immediately. The Contractor shall submit a Method Statement to the Contract Manager and ECO for approval of the procedure for dealing with an accidental hydrocarbon spill: •Any single spill in excess of 200 shall be reported to the Department	Diesel spillage was observed under the operational generator, even though a drip tray was present.	The contractor should ensure that drip trays are placed correctly under parked plant. Additionally, the fire extinguisher did not indicate date of last service.	**Closed-Out/ Corrected** Contaminated soil has been removed and stored in the hazardous wheelie bin at the warehouse area.	N/A

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

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
070	EA 115 **For Nordex** EMPr 5.3.15.6 For Nordex EMPr 5.3.15.7 For Nordex	An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate reduction, recycling and re-use options where appropriate. Where solid waste is disposed of, such disposal shall only occur at a landfill licensed in terms of section 20(b) of the National Environment Management Waste Act, 2008 (Act 59 of 2008). Appropriate general waste (e.g. construction debris, rubble, timber, tins, drums and domestic waste) collection, storage and removal from site shall be implemented. • Waste shall be removed daily from areas remote from camp and transferred to the appropriate waste storage facility. • All non-recyclable litter and refuse shall be disposed of off-site at a licensed landfill facility approved by the Contract Manager and ECO. Precautions shall be taken to avoid any waste from spreading on, or from, the site.	General waste was observed in a hazardous waste bin on multiple occasions during site inspection at the buffer yard and warehouse area.	The contractor should place greater emphasis on waste management, with a particular focus on proper on-site segregation.	**Open/ Uncorrected**	  Figure 58: Hazardous waste bin and spill kit have been used for general waste storage at Nordex work areas.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		• Scavenger and weatherproof bins with lids shall be provided at the contractor's camp, of sufficient number and capacity to store the general domestic waste produced on a daily basis. • Bins shall not be allowed to become overfull and shall be emptied regularly at the waste storages areas in the Contractor's camp, or directly transferred to an approved landfill.				

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
065	EA 111 **For Nordex** EA 112 **For Nordex** EA 113 **For Nordex** EMPr 5.3.3.2 **For Nordex**	Hazardous substances must not be stored where there could be accidental leakage into surface or subterranean water. Hazardous and flammable substances must be stored and used in compliance to the applicable regulations and safety instructions. Furthermore, no chemicals must be stored nor may any vehicle maintenance occur within 350m of the temporal zone of wetlands, a drainage line with or without an extensive floodplain or hillside wetlands. Temporary bunds must be constructed around chemical storage to contain possible spills, The main contractor's camp layout shall make provision for (where applicable): • Hazardous material / chemical storage and fuel storage. • Waste storage and wastewater	Hazardous substance at the warehouse were not stored appropriately and not in accordance with hazardous and flammable substances regulations and safety instruction. Temporary bund has also not been constructed by the contractor. All staff working with chemicals not trained on safe use of the chemical.	The contractor should make provision for hazardous chemical storage area where access will be restricted.	**Open/ Uncorrected** An NCR has been issued by the ECO, and the contractor has committed to constructing a temporary bund area by the next reporting period.	 Figure 59: Hazardous chemicals stored neatly, though improperly, at the warehouse.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		management. • Plant parking facilities and a vehicle refuelling/maintenance area/s. • Emergency equipment storage areas including fire extinguishers and first aid kits.				
	EMPr 5.3.9.3 **For Nordex**	If potentially Hazardous Chemical Substances are to be stored on site, then: • Hazardous Chemical Substances shall be stored in appropriate containers which are clearly labelled and sealed. • Hazardous Chemical Substance containers shall be situated on a smooth impermeable surface (concrete or 250 micrometre (µm) plastic (plastic must have a minimum of a 5 cm layer of sand on top to prevent damage and perishing)) within an earth bund. The impermeable lining shall extend to the crest of the bund and the volume inside the bund shall be 120% of the total capacity of all the storage tanks/bowsers (110% statutory requirement plus allowance for rainfall).				

5.8 INCIDENTS

Three (03) new incidents were reported by Power construction during the current reporting period. On the 15th of July 2025, a tipper truck transporting gravel went off road RW22 at WTG W17 and toppled over to its side, leading to small hydrocarbon spills on RW22 and topsoil disturbance. To rehabilitate the soil, OilCap was applied to the contaminated area and the topsoil embankment was trimmed and reinstated again on 17 July 2025. Four days later, diesel leakage into G5 material was noted from the Pneumatic Roller while on breakdown. A drip tray was placed under the leak by the mechanic and OilCap was used to remediate the contaminated area. During the ECO audit inspection, small diesel spillages were noted next to the main diesel tank, occurring from refuelling activities. OilCap was applied to the contaminated area and the storeman was reminded to ensure use of drip trays when refuelling.

Three (3) more environmental incidents were reported by Nordex during the current reporting period. On the 14th of August 2025, a hydraulic pipe rupture was reported by Nordex during the lowering of the super lift at WTG W9. Spill kit absorbents were used to contain the spill and the contaminated soil was later removed and placed in plastic bags for storage in the hazardous waste skip. On the 18th of August 2025, crane LH62 operating at WTG W3 experienced an oil leak from suspected hydraulic system. The activity causing the leakage ceased and preliminary clean-up was initiated using absorbent materials. On the 21st of August 2025, during the ECO audit inspection, grout wastewater spillage was noted at WTG W9. This was a result of poor choice of disposal into sandbags which are porous following the cleaning of grouting pipes.

The contractors are advised to report all environmental incidents to the ECO for monitoring of requisite remedial action undertaken by the contractor following an incident.



Figure 60: Hydrocarbon spill at RW22.



Figure 61: Application of OilCap to remediate the hydrocarbon spill at RW22.



Figure 62: Minor diesel spillages at Power site camp.



Figure 63: Application of OilCap to minor diesel spillages at Power site camp.



Figure 64: Hydraulic pipe rupture reported by Nordex.



Figure 65: Clean-up of contaminated soil from hydraulic oil.



Figure 66: Hydraulic fluid leak reported by Nordex at WTG W3.



Figure 67: Contaminated soil was removed and the area backfilled with topsoil.



Figure 68: Grout wastewater spillage reported by Nordex at WTG W9.



Figure 69: Grout spillage was allowed to dry and the rubble was disposed as general waste.

5.9 COMPLAINTS

No new complaint was reported to the ECO during this reporting period. The complaint that was raised during the previous reporting period regarding gates being left open is being monitored. The contractors are keeping photographic record of gate closure after use. It should be noted that all environmental complaints should be reported to the ECO as soon as they occur.

6 CONCLUSION

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

Table 5: Summary of observations noted.

Description	Number Raised during Reporting Period	Total Number Raised	Total Number Open/ Uncorrected
Areas of Concern	**5**	**31**	**5**
Non-compliances	**11**	**81**	**10**
Non-compliance Reports	**1**	**2**	**1**
Incidents	**6**	**29**	**0**
Complaints	**0**	**17**	**1**

7 ASSUMPTIONS AND LIMITATIONS

The following assumptions and limitations apply to this report:

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