EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

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

OCTOBER 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



DOCUMENT DETAILS

EIMS REFERENCE: 1594

DOCUMENT TITLE: October 2025 Monthly ECO Audit Report

DOCUMENT CONTROL

	NAME	SIGNATURE	DATE
COMPILED:	Sisipho Mpotulo	Sent Electronically	2025/11/05
CHECKED:	Sikhumbuzo Mahlangu	Sent Electronically	2025/11/05
AUTHORIZED:	Liam Whitlow	Sent Electronically	2025/11/05

REVISION AND AMENDMENTS

REVISION DATE:	REV #	DESCRIPTION
2025/11/05	ORIGINAL DOCUMENT	Draft ECO Report
2025/11/11	Revision 1	Final Eco Report

This document contains information proprietary to Environmental Impact Management Services (Pty) Ltd. and as such should be treated as confidential unless specifically identified as a public document by law. The document may not be copied, reproduced, or used for any manner without prior written consent from EIMS. Copyright is specifically reserved.

Table of Contents

1 INTRODUCTION 5
1.1 DETAILS OF THE HOLDER 5
1.2 BRIEF PROJECT DESCRIPTION 6
1.3 PROJECT PROGRESS 8
2 DETAILS OF THE ECO 9
2.1 EXPERTISE OF THE ECO 9
2.2 DECLARATION OF INDEPENDENCE 9
3 SCOPE, PURPOSE AND OBJECTIVE OF THE AUDIT 9
4 AUDIT METHODOLOGY 10
4.1 PROCEDURE FOR THE AUDIT 10
4.2 EVALUATION CRITERIA USED DURING THE AUDIT 10
4.3 DOCUMENTATION REVIEW 11
4.4 SITE ASSESSMENT 14
5 RESULTS OF THE AUDIT / LEGAL COMPLIANCE 17
5.1 COMPLIANCE SUMMARY 17
5.2 GOOD COMPLIANCES 21
5.3 AREAS OF CONCERN 24
5.4 NON-COMPLIANCES 25
5.5 NON-COMPLIANCE REPORTS 32
5.6 AVIFAUNAL MONITORING 32
5.7 STATUS OF NON-COMPLIANCES REPORTED DURING PREVIOUS REPORTING PERIODS 33
5.8 INCIDENTS 40
5.9 COMPLAINTS 40
6 CONCLUSION 41
7 ASSUMPTIONS AND LIMITATIONS 41

List of Tables

Table 1: Details of the holder. 5
Table 2: List of Good Compliances recorded during this reporting period. 21
Table 3: Environmental Non-Compliances raised during the current reporting period. 25
Table 4: Environmental Non-Compliances raised during the previous reporting period. 33
Table 5: Summary of observations noted. 41

Figures

Figure 1: Impofu Cluster boundaries. 7

Figure 2: Water storage tanks at Impofu West Substation. 15
Figure 3: Rehabilitation of blade fingers and excavation of v-drain at WTG E1. 15
Figure 4: Topsoil re-instated at Impofu West Substation. 15
Figure 5: Stable vegetation growth on embankment at Powfontein Substation. 15
Figure 6: R102 road repairs by the Kouga Municipality employees. 15
Figure 7: Stormwater channelling with dissipators at W6. 15
Figure 8: Disposal of cardboard box on top of skip cover at the buffer Yard. 15
Figure 9: Wood waste becoming unmanageable at the buffer yard. 15
Figure 10: Controlled de-watering of WTG N15 base. 16
Figure 11: New road construction for farmer using excess stockpiled material. 16
Figure 12: Bricklaying of warehouse at Impofu West Substation. 16
Figure 13: Correction of improperly stored kerbs at Impofu West Substation. 16
Figure 14: Housekeeping of grout mix by EMPA at WTG E15. 16
Figure 15: Dust emission at the Buffer Yard. 16
Figure 16: Water ponding at West Substation laydown area. 16
Figure 17: Housekeeping was observed at Powfontein Substation during the audit inspection. 16
Figure 18: Summary of compliance with the requirements of the Impofu West EA (Power Construction). 18
Figure 19: Summary of compliance with the requirements of the Impofu West EMPr (Power Construction). 18
Figure 20: Summary of compliance with the requirements of the Impofu East EA (Power Construction). 18
Figure 21: Summary of compliance with the requirements of the Impofu East EMPr (Power Construction). 18
Figure 22: Summary of compliance with the requirements of the Impofu North EA (Power Construction). 18
Figure 23: Summary of compliance with the requirements of the Impofu North EMPr (Power Construction). 18
Figure 24: Summary of compliance with the requirements of the Impofu North EA (Nordex). 19
Figure 25: Summary of compliance with the requirements of the Impofu North EMPr (Nordex). 19
Figure 26: Summary of compliance with the requirements of the Impofu West EA (Nordex). 19
Figure 27: Summary of compliance with the requirements of the Impofu West EMPr (Nordex). 19
Figure 28: Summary of compliance with the requirements of the Impofu East EA (Nordex). 19
Figure 29: Summary of compliance with the requirements of the Impofu East EMPr (Nordex). 19
Figure 30: Summary of compliance with the requirements of the Buffer Yard EA (Nordex). 20
Figure 31: Summary of compliance with the requirements of the Buffer Yard EMPr (Nordex). 20
Figure 32: Summary of compliance with the requirements of the Substations EMPr (Brand Besamandla). 20
Figure 33: Summary of compliance with the requirements of the Water Use Authorisations (GA) (Power Construction). 20
Figure 34: Rehabilitation of internal roads at Impofu East Wind Farm. 21
Figure 35: Herbicide application at Impofu North Wind Farm. 22
Figure 36: Topsoil trimming and fence re-instatement at WTG N10. 23
Figure 37: Hazardous waste appropriately stored at Power Site Camp. 23

Figure 38: Mobile toilet unsecured and unstable at WTG N13. 24
Figure 39: Servicing of ablution units at Impofu West Substation. 24
Figure 40: HCS spillages at Impofu East Substation. 25
Figure 41: Overfilled wheelie bin at Nordex warehouse was emptied. 26
Figure 42: HCS containers stored directly on the ground at Nordex warehouse. 27
Figure 43: Spill kit bin used for hazardous waste storage at the buffer yard. 28
Figure 44: Labelling of hazard waste area at the buffer yard. 28
Figure 45: Material stockpiled on rehabilitated embankment was removed. 29
Figure 46: Poor housekeeping at Brand Besamandla site camp. 29
Figure 47: Conductor drum placed on topsoil at Impofu West Substation laydown area. 30
Figure 48: Smoking area not equipped with fire extinguisher at Impofu East Substation. 30
Figure 49: HCS spillages noted at Impofu WTG E15. 31
Figure 50: Contractors send photographs before and after shift as proof that gates are not left open. 34
Figure 51: HCS bunded storage under construction at Nordex warehouse. 35
Figure 52: Cement mixing trays removed at Impofu East Substation. 37
Figure 53: Inappropriately stored HCS containers removed from the buffer yard. 37
Figure 54: Full drip tray at the buffer yard has been emptied. 38
Figure 55: Cloths from the mobile chemical toilets poorly disposed. 39
Figure 56: Inert rubble waste mixed with contaminated soil at the buffer yard. 39

List of Abbreviations

Abbreviation	Item
DEA	Department of Environmental Affairs
DFFE	Department of Forestry, Fisheries and the Environment
DWS	Department of Water and Sanitation
EA	Environmental Authorisation
ECO	Environmental Control Officer
EO	Environmental Officer
EGP	Enel Green Power
EIMS	Environnemental Impact Management Services (Pty) Ltd
EMPr	Environmental Management Programme
GA	General Authorisation

Abbreviation	Item
I&AP	Interested and Affected Party
NC	Non-Compliance
NCR	Non-Compliance Report
NMBMM	Nelson Mandela Bay Metropolitan Municipality
OHL	Overhead Line
MPRDA	Mineral and Petroleum Resources Development Act
WF	Wind Farm

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 October 2025 for the development of three (3) Wind Energy Facilities referred to as the Impofu Wind Cluster and associated infrastructure near Oyster Bay in the Eastern Cape.

1.1 DETAILS OF THE HOLDER

Details of the holder are summarised in Table 1 below.

Table 1: Details of the holder.

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

1.2 BRIEF PROJECT DESCRIPTION

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

Impofu North

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

Impofu East

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

Impofu West

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

Authorisations, Permit and or Management Plans

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

The below authorisations were obtained for the aforementioned:

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

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

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

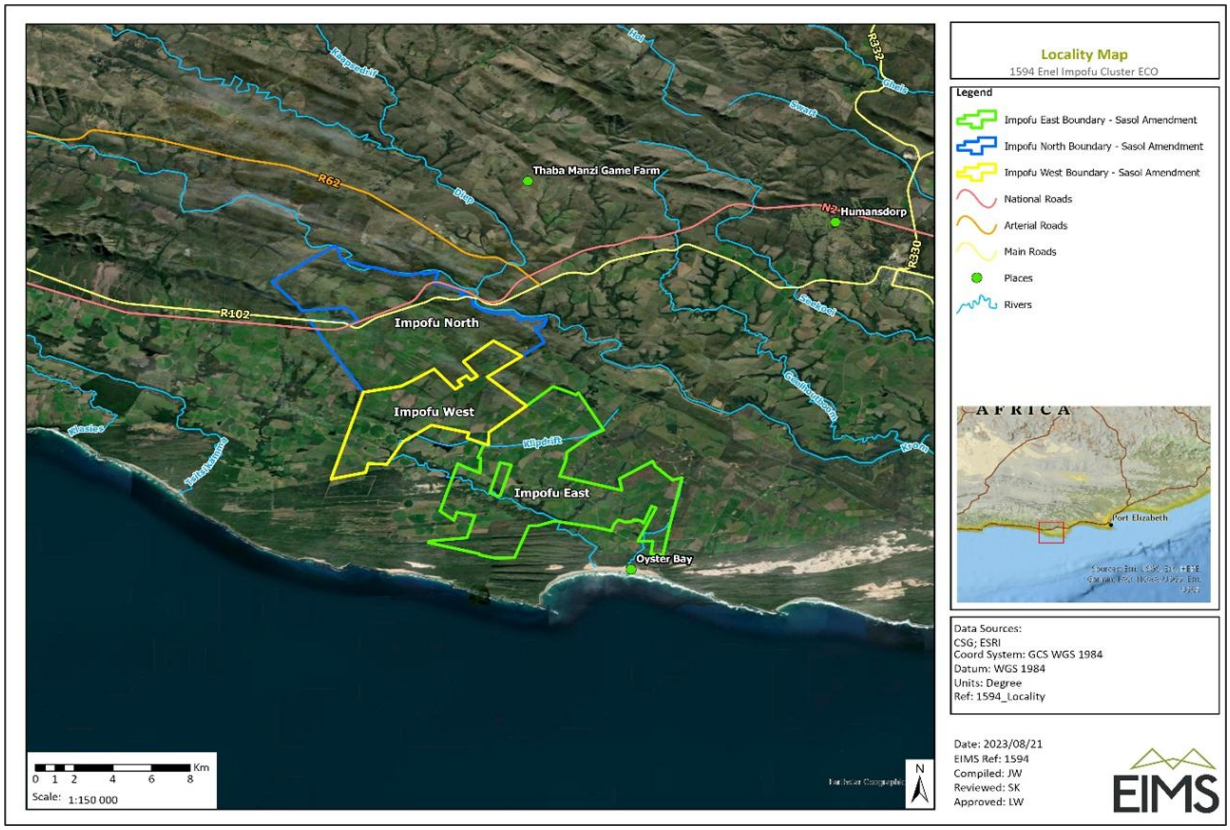


Figure 1: Impofu Cluster boundaries.

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

- Turbines: Up to 19 turbines with a hub height 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.

1.3 PROJECT PROGRESS

The project currently has three (3) contractors, Power Construction (Power) (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. During the current reporting period, biosecurity for Food and Mouth (FMD) disease was suspended by Power Construction on the 24th of September 2025. Additionally, weed control through herbicide application was undertaken at Impofu North Wind Farm. The construction of North and Powfontein substation have been completed and IPP buildings furnished. Construction of the following is still underway:

- East substation.

- West substation.
- MV reticulation.
- Topsoil reinstatement.
- Earthworks;
- Phased rehabilitation.

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. Environmental awareness topics that were covered during the current reporting period include: waste hierarchy and storage of waste, washing down plant machinery, badger setts, nesting birds, and other biodiversity matters. Registers were available in the contractors site file, such as the updated incident register; a complaint register; updated water register; training registers; updated waste register; as well as updated weekly monitoring reports.

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 33.6 m^3 of general waste was collected from site and disposed at the landfill site during the current reporting period. Brand Besamandla disposes waste at Power Construction waste management area. The ECO advised that the safe disposal certificates be filed for auditing and record retention purposes.

Nordex has appointed an independent service provider, Zumbe Services (Pty) Ltd who has appointed Luvan Plant Hire (Pty) Ltd for collection and disposal of general waste at registered landfill site, Humansdorp Landfill site (permit number: 12/9/11/P53) in Kouga Local Municipality. A total of 111 m^3 of general waste was removed from Nordex sites. Large amounts of wood waste were periodically donated to local community, however, the Contractor did not quantify these due to the variable vehicles and trailers used.

Hazardous Waste

Power Construction has appointed independent service provider, 'Extreme Projects' to collect, transport and dispose of hazardous waste at a registered hazardous waste 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, and sometimes 'EnviroServ', is used by Nordex. A total of 6 m^2 of solid hazardous waste was disposed by Nordex. Contaminated soil which was been stored at the buffer yard for more than three weeks was not removed during the current reporting period. Power Construction did not remove any hazardous waste disposed during the current reporting period. It is noteworthy that the hazardous waste (one wheelie bin) which was at Algoa substation has been stored at Power site camp for disposal.

Sewage Waste

Power Construction 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 3.6 m^3 of effluent for disposal from servicing toilets. The conservancy tank was serviced six times, and Sewage works' collecting a total of 60 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 1.08 m^3 of effluent was collected for disposal during the current reporting period.

The conservancy tank at Nordex site camp was serviced twice in during the current reporting period, with Mandsons collecting a total of 20 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 6.12 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 Vermaak for the current reporting period. Water from the boreholes is used for dust suppression of access roads as well as other work areas and to flush toilets at the site camp.

Based on the information provided to the ECO, borehole water abstraction monitoring results from Power between the 16th of September 2025 and 24th of October 2025 are as follows:

Farm name	August (m^3)	September (m^3)	October (m^3)	Total abstracted from 11 January to 16 September 2025 (m^3)
Steynberg	1 029	1 801	937	17 372
Biggs	0.3	21	0	5 064
Cilliers	0	0	0	18 529
Vermaak	0	245	86	6 041
Masterson	0	0	0	9 983
Total (m^3)	**1 032**	**2 071**	**1 023**	

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.

4.4 SITE ASSESSMENT

The audit was conducted on the 21st and 23rd of October 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**: Rehabilitation 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**:
    - Brickwork and final fix on warehouse.
    - Installation of perimeter and internal kerbs.
    - Installation of equipment clamps.
    - Importation of yard stone.
    - Cold commissioning.
    - Final fix Eskom and IPP relay buildings.
    - Fencing of O&M.
    - Final punch items on perimeter works, i.e. hessian weave, drains, stormwater canals, etc.
- **Powfontein Substation**:
    - Stringing of conductor on equipment.
    - Yard stone final punch items.
    - Installation of electric fence.
    - Final punch items on perimeter works, i.e. hessian weave, drains, stormwater canals, etc.
- **North Substation**:
    - Final punch items on perimeter works, i.e. hessian weave, drains, stormwater canals, etc.
    - Termination of fibre cables.
    - Installation of Electric Fence.
    - Final works on the O&M building, including paint and furniture.
- **East Substation**:
    - Installation of light masts.
    - Final painting of the hazardous waste, O&M, IPP, and Eskom buildings.
    - Installation of electric fence
    - Remedial works on the busbar Supports on Eskom platform.
    - Backfilling and compaction of G5 material.
    - Installation of Capacitor Bank MV Cables.
- **MV Cable installation**
    - Cable installation and backfilling at Impofu West Wind Farm.

Nordex is currently undertaking the following activities:

- Pre-assembly of internals, and transportation of blades; and
- Preparation of a hub, Nacelle and blades at Impofu West and East.



Figure 2: Water storage tanks at Impofu West Substation.



Figure 3: Rehabilitation of blade fingers and excavation of v-drain at WTG E1.



Figure 4: Topsoil re-instated at Impofu West Substation.



Figure 5: Stable vegetation growth on embankment at Powfontein Substation.



Figure 6: R102 road repairs by the Kouga Municipality employees.



Figure 7: Stormwater channelling with dissipators at W6.



Figure 8: Disposal of cardboard box on top of skip cover at the buffer Yard.



Figure 9: Wood waste becoming unmanageable at the buffer yard.



Figure 10: Controlled de-watering of WTG N15 base.



Figure 11: New road construction for farmer using excess stockpiled material.



Figure 12: Bricklaying of warehouse at Impofu West Substation.



Figure 13: Correction of improperly stored kerbs at Impofu West Substation.



Figure 14: Housekeeping of grout mix by EMPA at WTG E15.



Figure 15: Dust emission at the Buffer Yard.



Figure 16: Water ponding at West Substation laydown area.



Figure 17: Housekeeping was observed at Powfontein Substation during the audit inspection.

5 RESULTS OF THE AUDIT / LEGAL COMPLIANCE

EIMS have been appointed to undertake legal compliance audits in terms of the EA, GA and EMPr of the Impofu Wind Farms and associated infrastructure. The results of the monthly ECO Audit are provided in this section of the report. The compliance summary, areas of good compliance, areas of concern and areas of non-compliance are provided in sections 5.21 to 5.4.

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.

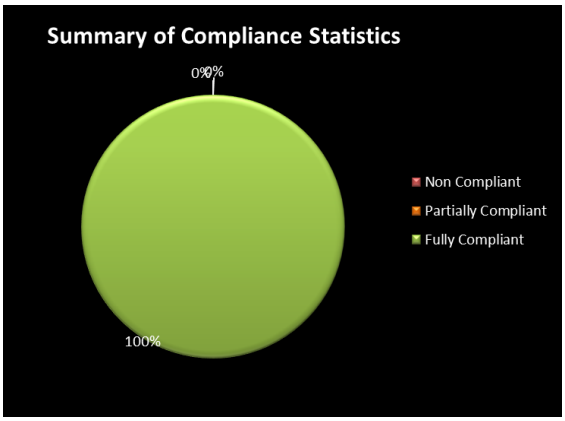


Figure 18: Summary of compliance with the requirements of the Impofu West EA (Power Construction).

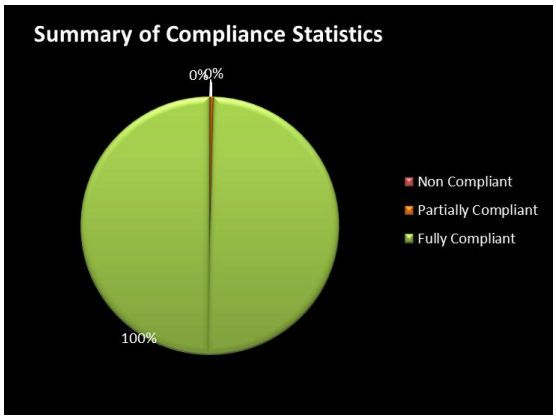


Figure 19: Summary of compliance with the requirements of the Impofu West EMPr (Power Construction).

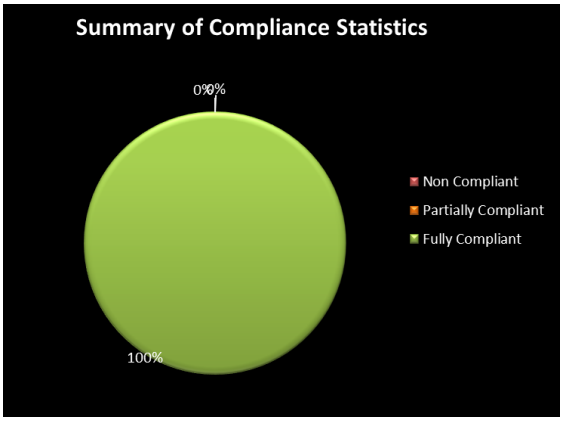


Figure 20: Summary of compliance with the requirements of the Impofu East EA (Power Construction).

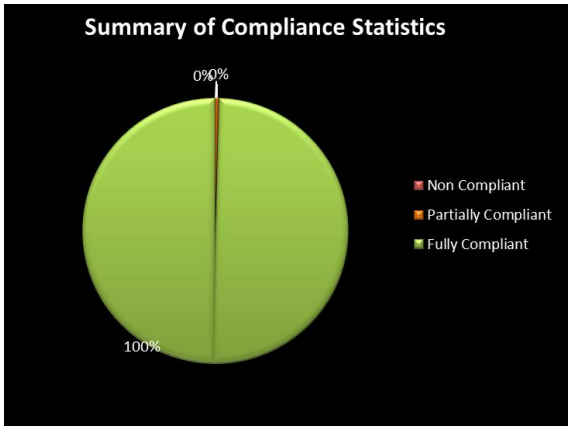


Figure 21: Summary of compliance with the requirements of the Impofu East EMPr (Power Construction).

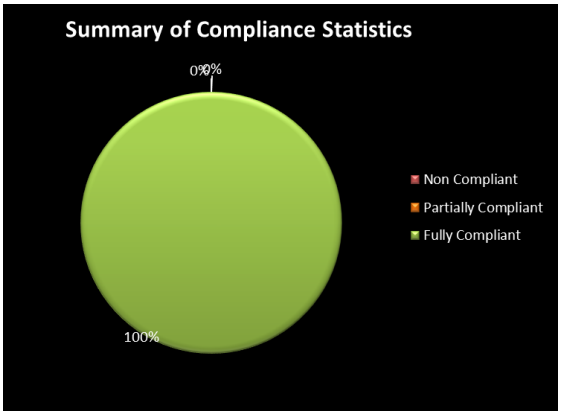


Figure 22: Summary of compliance with the requirements of the Impofu North EA (Power Construction).

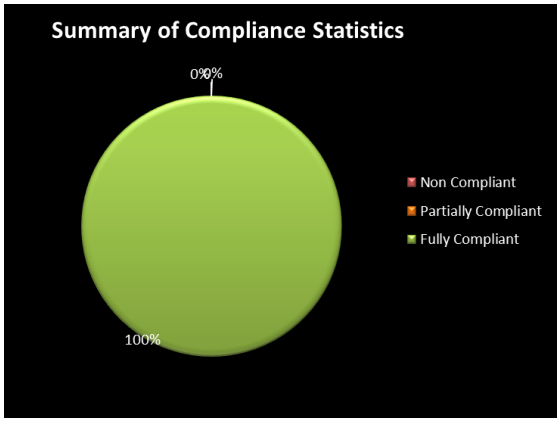


Figure 23: Summary of compliance with the requirements of the Impofu North EMPr (Power Construction).

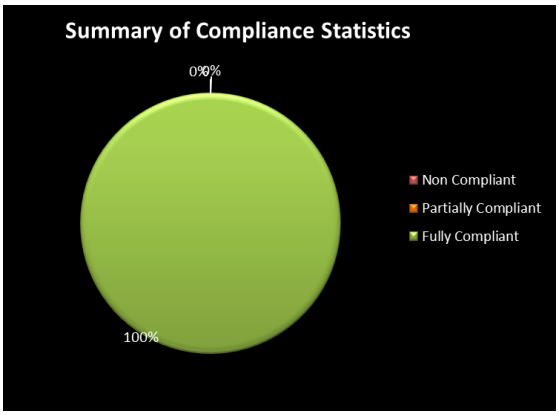


Figure 24: Summary of compliance with the requirements of the Impofu North EA (Nordex).

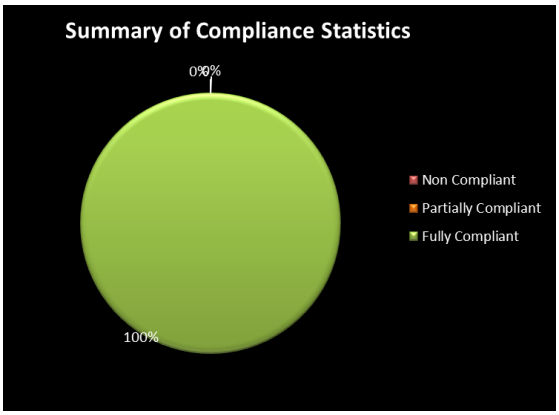


Figure 25: Summary of compliance with the requirements of the Impofu North EMPr (Nordex).

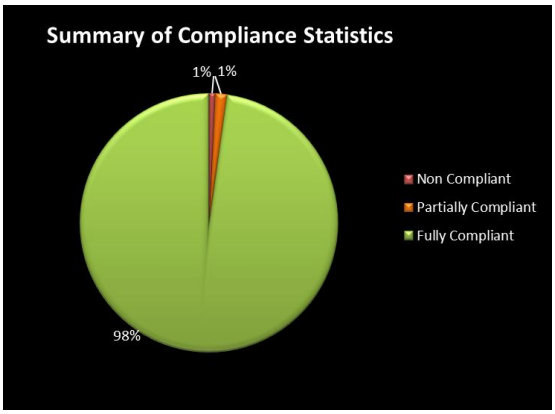


Figure 26: Summary of compliance with the requirements of the Impofu West EA (Nordex).

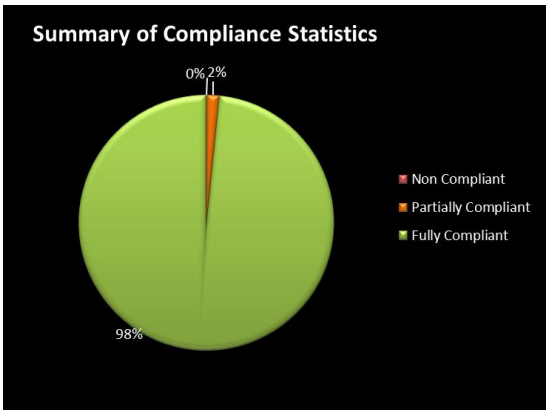


Figure 27: Summary of compliance with the requirements of the Impofu West EMPr (Nordex).

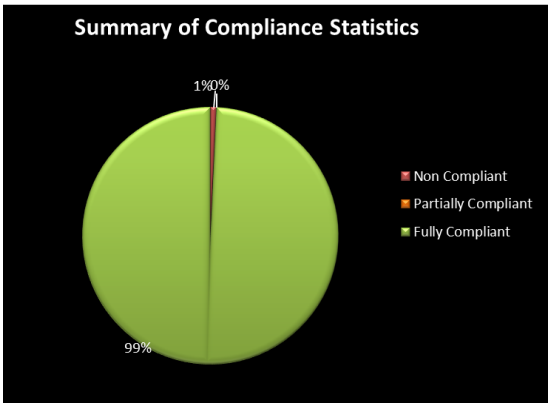


Figure 28: Summary of compliance with the requirements of the Impofu East EA (Nordex).

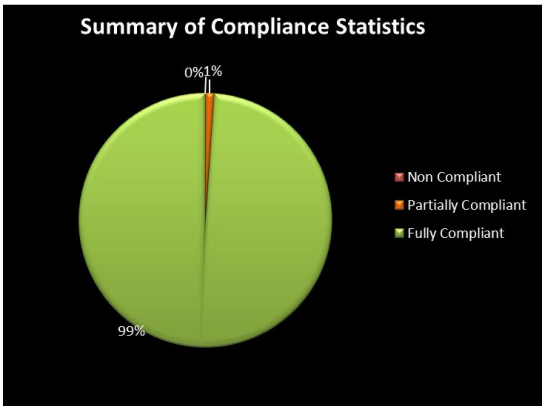


Figure 29: Summary of compliance with the requirements of the Impofu East EMPr (Nordex).

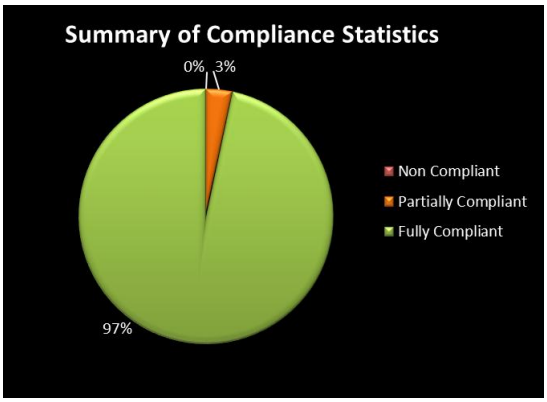


Figure 30: Summary of compliance with the requirements of the Buffer Yard EA (Nordex).

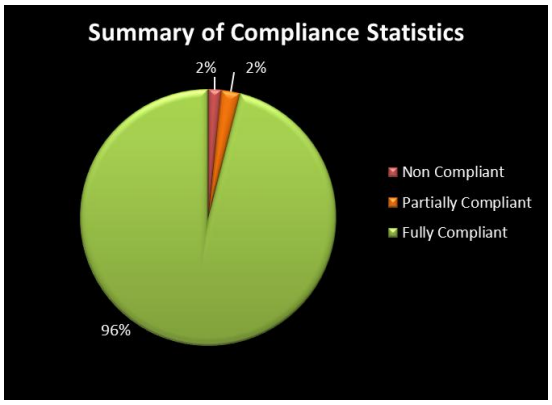


Figure 31: Summary of compliance with the requirements of the Buffer Yard EMPr (Nordex).

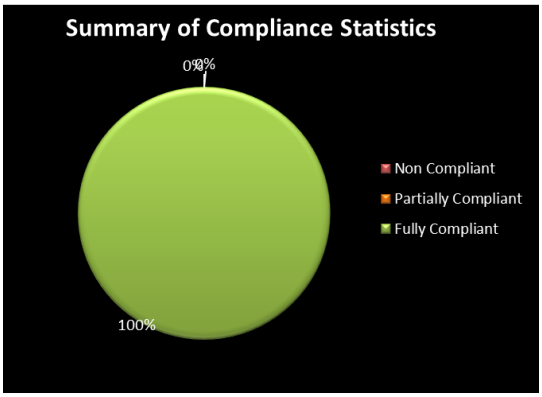


Figure 32: Summary of compliance with the requirements of the Substations EMPr (Brand Besamandla).

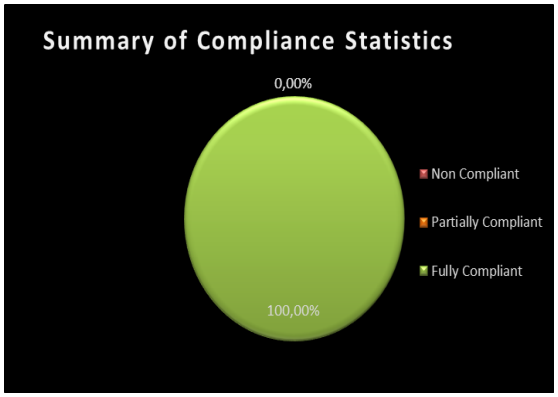


Figure 33: Summary of compliance with the requirements of the Water Use Authorisations (GA) (Power Construction).

5.2 GOOD COMPLIANCES

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

Location	Category	Responsible Party	Description	Photo Reference
Impofu West Wind Farm	Road Maintenance	Power Construction	Maintenance of private roads was observed during site inspection using excess material from substations.	  Figure 34: Rehabilitation of internal roads at Impofu East Wind Farm.

Location	Category	Responsible Party	Description	Photo Reference
Road to WTG N9	Weed Control	Power Construction	Herbicide application for weed control of *Datura ferox* was observed during site inspection.	 Figure 35: Herbicide application at Impofu North Wind Farm.
WTG N10	Topsoil trimming and fence re-instatement	Power Construction	During site inspection, Power Construction employees were observed doing topsoil trimmings at WTG N10. Additionally, the farmers fence was being reinstated where rehabilitation of blade fingers was complete.	

Location	Category	Responsible Party	Description	Photo Reference
				 Figure 36: Topsoil trimming and fence re-instatement at WTG N10.
Site Camp	Waste Management	Power-Besamandla Consortium	The hazardous waste bin which was at Algoa substation was moved to Power Site Camp. The area was observed clean and well Managed.	 Figure 37: Hazardous waste appropriately stored at Power Site Camp.

5.3 AREAS OF CONCERN

Three (03) concerns were observed by the ECO during the current reporting period. A mobile toilet was observed unsecured at WTG N13 where the team was preparing for skimming (Figure 39). This was due to broken jockey wheel and it was said to have been reported already. On a separate inspection, the security guard on RW10 did not have a toilet provided to them. The guard expressed that they had to walk approximately 300 m as they also had no transport close by.

Secondly, the fire extinguisher at the buffer yard was observed with low pressure, making it unfit for purpose in case of emergency. Lastly, During site inspection at Impofu West Substation, Bidvest was observed on site servicing toilets. Their method of cleaning toilets, particularly the disposal of wastewater was concerning. It was recommended to them that they dispose the water inside their tank instead of on site.

Concerns raised in the previous period were addressed with urgency and are being monitored closely. Housekeeping at West substation laydown area and buffer yard has improved immensely, although labelling is still not in place. Some wood waste at Impofu Wind farm substations was disposed and the rest neatly stacked. Broken or open drip trays, however, 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 38: Mobile toilet unsecured and unstable at WTG N13.



Figure 39: Servicing of ablution units at Impofu West Substation.

5.4 NON-COMPLIANCES

Nine (09) new non-compliances were raised during this reporting period, and three (03) remain open according to information provided by the Contractors. 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
089	EMPr 5.17 **For Brand Besamadla**	Provision must be made for refueling 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.	Small diesel spillages were noted at Impofu East Substation laydown area, as well as Power Site Camp. These were said to be from the TLB on site.	Prevention of spillages is best. Ensure that parked plant are equipped with a drip tray. As part of housekeeping, monitor the site of spillages.	**Closed-Out/Corrected** Oil Cap was applied to the spillages, photo evidence was sent to the EO.	 Figure 40: HCS spillages at Impofu East Substation.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
090	EMPr 5.3.15.5 **For Nordex** EMPr 5.3.15.6 EMPr 5.3.15.7	The quantities of general waste generated on-site shall be minimised wherever possible by reducing, reusing and/or recycling it. Appropriate general waste (e.g. construction debris, rubble, timber, tins, drums and domestic waste) collection, storage and removal from site shall be implemented. Precautions shall be taken to avoid any waste from spreading on, or from, the site. • 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.	During site inspection, an overflowing wheelie bin was observed at the warehouse.	Active monitoring of waste area is recommended. Immediately remove full bins and remove any unused ones.	**Closed Out/Corrected** The bins were emptied and placed upside down to prevent unauthorized disposal. Monitoring of the area will continue.	 Figure 41: Overfilled wheelie bin at Nordex warehouse was emptied.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
091	EA 111 **For Nordex** EA 112 **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. 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. 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.	Improper storage of hazardous chemical substances (HCS) was observed at the Nordex warehouse. That is, HCS agents were not placed on impermeable surface. Upon enquiry, the warehouse worker indicated that the containers were being prepared for collection to site.	Efforts shall be made to keep HCS containers placed on an impermeable surface regardless of how long or short that will be.	**Closed Out/Corrected** The containers were temporarily placed on the wooden crates that were available on site.	 Figure 42: HCS containers stored directly on the ground at Nordex warehouse.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
092	EMPr Objective 12 **For Nordex**	The Contractor must be in possession of an emergency spill kit that must always be complete and available on site.	During site inspection, it was observed that there was no designated spill kit at Nordex warehouse and the buffer yard. The ones identified during the inspection were used as disposal bins.	The buffer yard stores a number of hydrocarbons as well as fuel. The area shall have spill kits readily available in case of spillages.	**Closed Out/Corrected** During audit inspection, the EO indicated that the spill kits had been procured and are stored inside the subcontractor's storage containers.	 Figure 43: Spill kit bin used for hazardous waste storage at the buffer yard.
093	EMPr Objective 11 **For Nordex**	Hydrocarbon waste must be contained and stored in sealed containers within an appropriately bunded area and clearly labelled. This must be regularly removed and recycled (where possible) or disposed of at an appropriately licensed landfill site.	During site inspection, it was observed that labels for general and hazardous waste area at the buffer yard had come off.	Designated waste areas shall be clearly labelled, and appropriate signage erected. The Contractor should look into more weatherproof labels. inspection.	**Open/Uncorrected** The EO submitted photographic evidence of labels that had been replaced. Unfortunately, the signage was down again during the audit	 Figure 44: Labelling of hazard waste area at the buffer yard.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
094	EMPr 5.5.1.32 EMPr 5.35 **For Brand Besamandla**	Cordon off areas that are under rehabilitation as no-go areas. Where impacted through construction related activity, all sloped areas must be stabilised to ensure proper rehabilitation is effected and erosion is controlled;	Construction material at West substation was observed creeping onto the topsoil, risking the suppression of vegetation growth.	Rehabilitation of the disturbed areas must be managed in accordance with Section 5.35: Landscaping and rehabilitation;	**Closed-Out/Corrected** The EO submitted photographic evidence of the corrected deviation. Repeat finding of this nature will result in an NCR.	 Figure 45: Material stockpiled on rehabilitated embankment was removed.
095	EMPr 5.3.15.7 **For Brand Besamandla**	Precautions shall be taken to avoid any waste from spreading on, or from, the site. • Scavenger and weatherproof bins with lids shall be provided at the contractor's camp, of sufficient number and capacity to store the general domestic waste produced on a daily basis. • Bins shall not be allowed to become overfull and shall be emptied regularly at the waste	During audit inspection, poor housekeeping of plastic waste and wire was observed at Brand Besamandla's site camp.	Housekeeping and waste separation is required at Brand Besamandla site camp.	**Open/Uncorrected**	 Figure 46: Poor housekeeping at Brand Besamandla site camp.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		storages areas in the Contractor's camp, or directly transferred to an approved landfill.				
096	EMPr 5.3.11.7 **For Brand Besamandla** EMPr 5.3.11.12	The stockpiles and stockpile areas shall be carefully managed to prevent cross-contamination of stockpile material and to guard against "stockpile creep" (topsoil stockpiles shall be clearly demarcated & be distinguishable from other material stockpiles). To ensure continued biological activity within topsoil stockpiles, stockpiled topsoil shall not exceed 1.5 m in height and shall not be compacted in any way.	During the audit inspection, two conductor drums were placed on topsoil at the Impofu West Laydown area.	Prevent compaction of topsoil stockpiles as far as possible. Stockpiled topsoil shall not be covered with any material (e.g. plastic) that may kill seeds or cause it to compost.	**Closed-Out/Corrected** The conductor drums were removed by the following week during housekeeping.	 Figure 47: Conductor drum placed on topsoil at Impofu West Substation laydown area.
097	EMPr 5.23 **For Brand Besamandla**	Designate smoking areas where the fire hazard could be regarded as insignificant;	At Impofu Easte substation, the smoking area was observed without a fire extinguisher.	Prevention of uncontrollable fires shall be implemented.	**Closed-Out/Corrected** The EO provided photographic evidence of the fire extinguisher at the smoking area.	 Figure 48: Smoking area not equipped with fire extinguisher at Impofu East Substation.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
098	EA 108 **For Nordex** EMPr 5.3.9.15 **For Nordex**	Leakage of fuel must be avoided at all times and if spillage occurs, it must be remedied immediately. 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.	Diesel spillages were observed at WTG E15. The grouting team indicated that this was not caused by them, but possible a delivery truck. Nonetheless, the EO indicated that the spillage should be cleaned.	The contractor should ensure that spillages are cleaned properly, and contaminated soil and material be stored appropriately for safe disposal.	**Open/Uncorrected**	 Figure 49: HCS spillages noted at Impofu WTG E15.

5.5 NON-COMPLIANCE REPORTS

Non-Compliance Reports (NCRs) are issued to the project or relevant contractor if the recorded NCs are not addressed in the agreed timeframes. Zero (0) NCRs were issued during the current reporting period. There is one open NCR that is pending closure by Nordex.

5.6 AVIFAUNAL MONITORING

Monitoring of a pair of Martial Eagles *Polemaetus bellicosus* with a nest was conducted by Jon Smallie from WildSkies Ecological Services (Pty) Ltd on the 24th of June 2025 and 20th of August 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 observations, the results were inconclusive and follow-up monitoring was arranged. On the 20th of August 2025, the following information was obtained:

- The nest was again approached on foot, no eagles were seen upon approaching the area;
- Observation of the nest and surrounding area comprised of more than two hours;
- No records of Martial Eagles were made;
- *En route* out of the farm a sub-adult Martial Eagle was seen flying directly towards the nest area.

Based on the above observations, it was concluded that breeding likely took place at the nest during the 2025 breeding season. The presence of the sub-adult does indicate that breeding took place in the territory, if not the nest itself.

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 breeding has likely taken place.

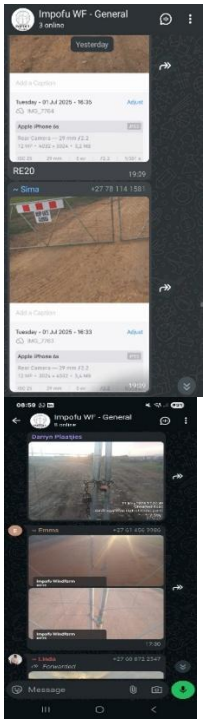
This is a fairly typical timeline for Martial Eagle breeding. These large eagles do not always breed every year, sometimes skipping a year. Importantly this breeding territory appears to have been occupied consistently for six years (2019 – 2025).

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 50: Contractors send photographs before and after shift as proof that gates are not left open.

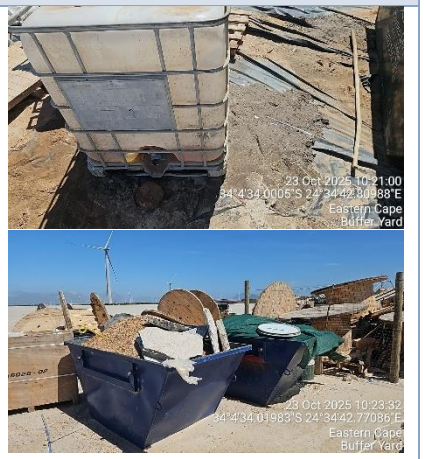
Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
065	EA 111 **For Nordex** EA 112 **For Nordex** EA 113 **For Nordex** EMPr 5.3.3.2 **For Nordex**	Hazardous substances must not be stored where there could be accidental leakage into surface 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.	**Work in progress** An NCR has been issued by the ECO. **The construction of a bund structure was finally initiated by an SMME. Cement mixing should be confined to the impermeable material provided.**	  Figure 51: HCS bunded storage under construction at Nordex 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).				

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
083	EMPr 5.8 **For Brand Besamandla**	All measures regarding waste management must be undertaken using an integrated waste management approach; Waste must be segregated into separate bins and clearly marked for each waste type for recycling and safe disposal;	Cement mixing trays were observed with general waste. Two days later, the same observation was noted with the tray now overflowing with waste.	Appropriate general 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.	**Closed Out/Corrected** During site inspection, it was noted that the cement mixing trays were removed to the laydown area.	 Figure 52: Cement mixing trays removed at Impofu East Substation.
085	EMPr Objective 2 **For Nordex** EMPr Objective 12	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. Keep a record of all hazardous substances stored on site. Clearly label all the containers storing hazardous waste. 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.	Unlabelled containers and drums were observed at the buffer yard. During previous site inspections, a similar observation of improper storage of potentially hazardous chemical substances was made.	Potentially hazardous chemical substances shall always be stored on impermeable surface and containers clearly labelled.	**Closed Out/Corrected** The EO reported that the containers had been removed.	  Figure 53: Inappropriately stored HCS containers removed from the buffer yard.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
086	EMPr Objective 12 **For Nordex**	Accidental spillage of potentially contaminating liquids and solids must be cleaned up immediately in line with procedures by trained staff with the appropriate equipment.	Diesel spillages were noted next to the diesel truck at the buffer yard. Additionally, the drip tray under the truck was full. The EO indicated that they were experiencing resistance from the mechanic regarding housekeeping and compliance to the EMPr conditions.	All spillage of oil onto concrete surfaces must be controlled by the use of an approved absorbent material and the used absorbent material disposed of at an appropriate waste disposal facility.	**Closed Out/Corrected** The drip tray was emptied and replaced.	 Figure 54: Full drip tray at the buffer yard has been emptied.
087	EMPr 5.3.4.2 **For Nordex**	Should portable/chemical toilets be used then these shall be used and maintained in such a way that they do not cause water or other pollution: • Toilets shall be serviced regularly (as per the service providers recommendations) and care shall be taken to ensure no spillage occurs when the toilets are cleaned or emptied and that the waste contents and grey water are	A cloth with chemical agents used by Bidvest Toilet Hire when servicing toilets, was noted at WTG E4 and E8. The Contractor indicated that the service provider was complaining about the use of cloths by the workers, instead of the toilet paper.	Proper disposal of potentially hazardous substance shall be implemented. Take call reasonable measures to eliminate and/or remedy any source of pollution or environmental degradation.	**Open/Uncorrected**	

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		properly stored before removal from site. Discharge of waste from toilets into the environment (e.g. burial of ablution waste from toilets) is strictly prohibited.				 Figure 55: Cloths from the mobile chemical toilets poorly disposed.
088	EMPr Objective 12 **For Nordex** EMPr Objective 11 **For Nordex**	Precautions must be in place to limit the possibility of oil and other toxic liquids from entering the soil or clean stormwater system. Implement a contingency plan to handle spills, so that environmental damage is avoided. 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.	The bund structure was observed with openings in the plastic lining. This is a major concern as the area has high activity i.e. storage of hazardous waste from the excessive environmental incidents by the contractor. This renders the bund ineffective.	Temporary storage sites of various streams i.e. general refuse, construction waste (wood and metal scrap), and contaminated waste as required, must seek to minimise the potential for impact on the surrounding environment, including prevention of contaminated runoff, seepage, and vermin control.	**WIP** The torn HDPE plastic liner was patched by the Contractor, and appeared intact during audit inspection. Two skips with contaminated soil were still on site, and were beginning to mix with rubble.	 Figure 56: Inert rubble waste mixed with contaminated soil at the buffer yard.

5.8 INCIDENTS

Two (02) incidents were reported during the current reporting period. On the 22nd of September 2025, Power Construction reported that ablution units were blown over and toppled by strong winds, even though they were anchored. Security personnel were instructed to pick them up and anchor, small spillages were cleaned by Bidvest. On the 25th of October 2025, a cranes hydraulic fitting became loose during operation. This resulted in a spillage of approximately 15 litres of hydraulic oil according to the Nordex. The spillage was reported to the EO and immediate containment and clean up was conducted. The contaminated soil was removed and stored at the buffer yard for disposal.

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.

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	**3**	**36**	**2**
Non-compliances	**9**	**98**	**8**
Non-compliance Reports	**0**	**2**	**1**
Incidents	**2**	**34**	**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.
- 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.