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NOVEMBER 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

Abbreviation	Item
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 November 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.

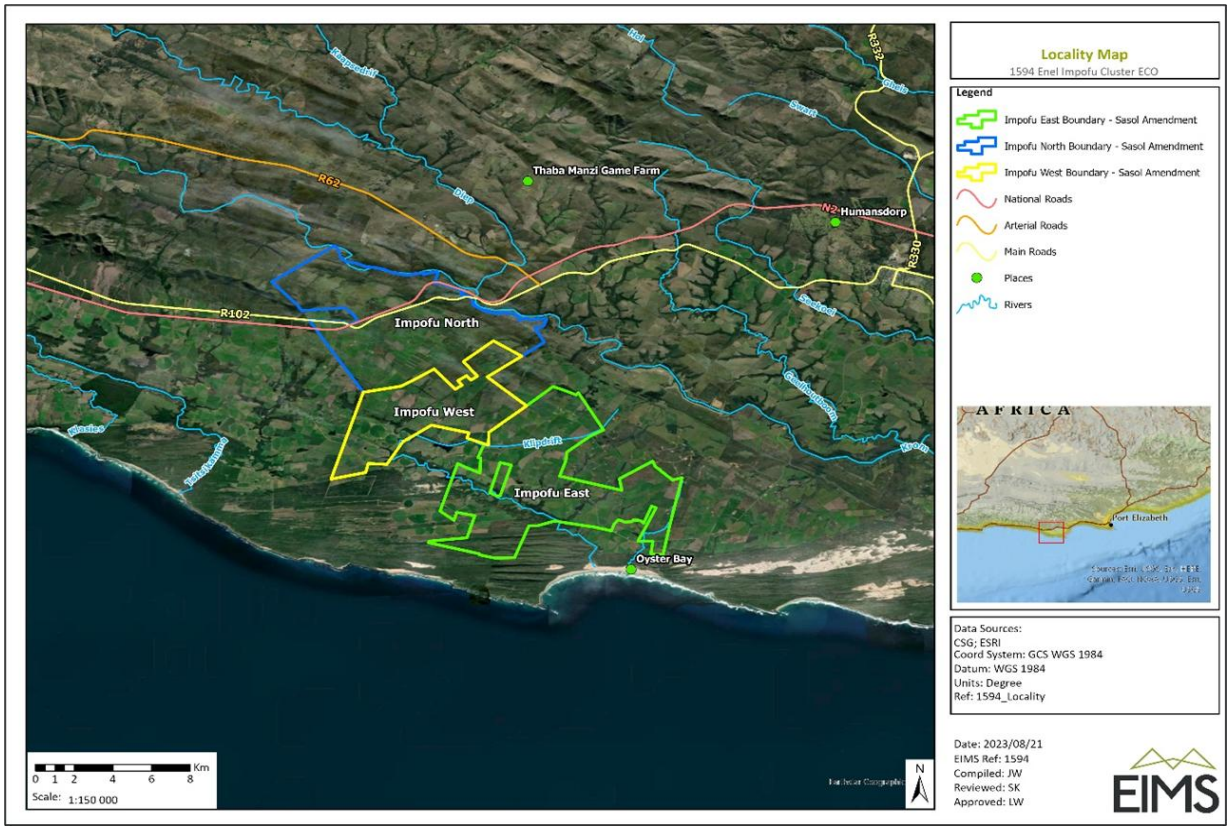


Figure 1: Impofu Cluster boundaries.

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, the project achieved a number of milestones. On the 19th of November 2025, Powfontein switching station was energized. According to the commissioning team, Algoa Substation and 132 kV the grid connection overhead power line had already been energized. North substation was successfully energized on the 25th of November 2025. Another milestone was celebrated on the 24th of November 2025, when Nordex completed the installation of the final turbine blade of Impofu Wind Cluster. Essentially, all fifty seven turbines and turbine blades have been successfully installed.

Although major construction activities have ceased, several non-conformances were identified during the current reporting period. While many of these have since been rectified, the ECO notes that a number of the issues were related to site management practices by the Contractor and subcontractors. For example, the ECO repeatedly requested the removal and appropriate storage of sandbags previously used to stabilise signage. As these sandbags were no longer serving an operational purpose, they presented a potential pollution risk. Additionally, the ECO noted HCS spillages repeatedly, some of which were resulted from broken drip trays. During this reporting period, delays were also experienced in receiving EO feedback regarding the rectification of non-conformances and the implementation of measures to prevent recurrence.

The construction of North and Powfontein substations have been completed and O&M 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 covered dust and air quality, topsoil management, as well as snake awareness. 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 20.48 m^3 of general waste was collected from site and disposed at the landfill site during the current reporting period. This includes building rubble disposed by 'Power Buildings'. 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 96 m^3 of general waste was removed from Nordex sites during the current reporting period. Wood waste was freely donated to the community as witnessed during the audit inspection. However, the Contractor did not quantify these due to the variable sizes of 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 12 m^3 of contaminated soil was disposed from the buffer yard by Nordex. According to the EO, the hazardous waste skip was not serviced

during the current reporting period, the last service was on the 27th of October . As such, the hazardous waste skip was overflowing during the audit inspection. 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 in December 2025.

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 1.7 m^3 of effluent for disposal from servicing toilets. The conservancy tank was serviced four times, and Sewage works' collected a total of 40 m^3 of effluent waste. 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 1.36 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 3.04 m^3 of effluent was disposed during the current reporting period, almost fifty percent less than the previous reporting period due to the completion of major works and de-mobilization of trailer toilets.

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 only one farm borehole, Steynberg's, 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 25th of October 2025 and 17th of November 2025 are as follows:

Farm name	September (m^3)	October (m^3)	November (m^3)	Total abstracted from 11 January to 17 November 2025 (m^3)
Steynberg	1 801	937	789	18 161
Biggs	21	0	0	5 064
Cilliers	0	0	0	18 529
Vermaak	245	86	0	6 041
Masterson	0	0	0	9 983
Total (m^3)	**2 071**	**1 023**	**789**	



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 18th and 20th of November 2025. Activities for the current reporting period include the following:

- **Foundations**: WTG recess and duct trenching, dewatering WTG excavations, preparation and painting of WTG plinths, of as well as rigid inclusions remedial works.
- **Crane pads and platforms**: Rehabilitation of blade fingers, 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, as well as phased de-establishment of site camp containers.

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.
    - Substation energized.
- **North Substation**:
    - Final punch items on perimeter works, i.e. hessian weave, drains, stormwater canals, etc.
    - Termination of fibre cables.
    - Final punch items on perimeter works, i.e. hessian / drains / storm water canals / etc.
    - Installation of Capacitator Bank MV Cables.
- **East Substation**:
    - Final painting of the hazardous waste, O&M, IPP, and Eskom buildings.



- Backfilling and compaction of G5 material for installation of pavement/yard stones.
- Remedial works on the Busbar Supports on ESKOM Platform.
- Installation of Capacitator Bank MV Cables.
- De-establishment of site infrastructure.

- **MV Cable installation**
  - Cable installation and backfilling at Impofu West Wind Farm.
  - Connections to junction boxes.
  - Removal of excess MV cables from site.

Nordex is currently undertaking the following activities:

- Preparation of hub, nacelle and blades at Impofu West and East.



Figure 2: Water abstracted from the borehole is already connected to the O&M building



Figure 3: Culvert at Impofu West Substation with sand ingress.



Figure 4: Embankment at Impofu North Substation completely covered with vegetation.



Figure 5: Hazardous chemical storage already in use by Nordex.



Figure 6: De-watering of WTG E1 base onto farmlands.



Figure 7: De-watering of WTG E1 Base



Figure 8: Wood waste reclamation by the community from the buffer yard using a bakkie.



Figure 9: De-mobilization and housekeeping conducted at Impofu East Substation.



Figure 10: The wetland at Impofu West Wind Farm indicating impressive recovering.



Figure 11: Open trench at WTG W14 for MV cable installation.



Figure 12: Rehabilitation of blade finger at WTG W7.



Figure 13: Impofu East Substation Junction Box Interface.



Figure 14: Wood waste yet to be removed from Impofu West Substation.



Figure 15: Stone pitching of stormwater channel at Impofu West Substation is complete.

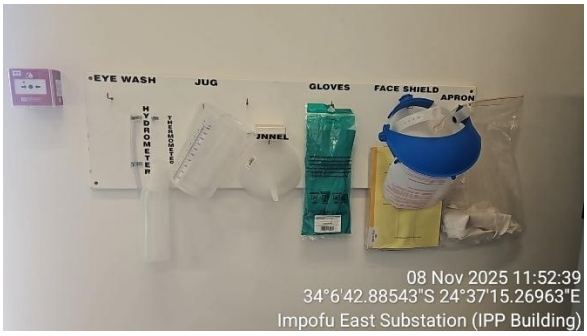


Figure 16: PPE and emergency eye wash ready at the IPP Building, Impofu East Substation.



Figure 17: Stormwater channel completely filled with silt on Road West 8, Impofu West Wind Farm.

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.

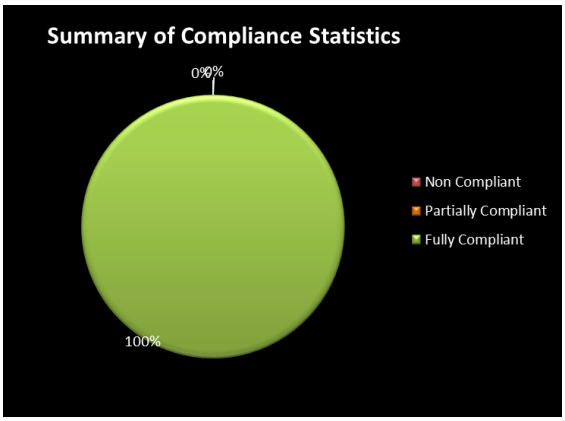


Figure 18: Summary of compliance with the requirements of the Impofu West EA (Power Construction).

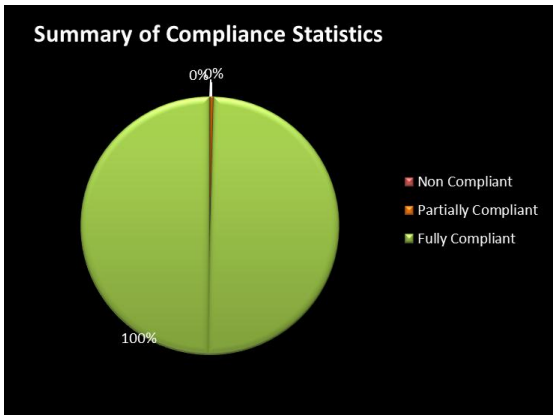


Figure 19: Summary of compliance with the requirements of the Impofu West EMPr (Power Construction).

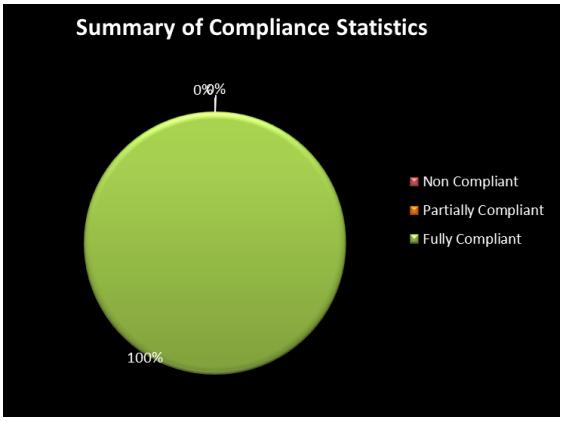


Figure 20: Summary of compliance with the requirements of the Impofu East EA (Power Construction).

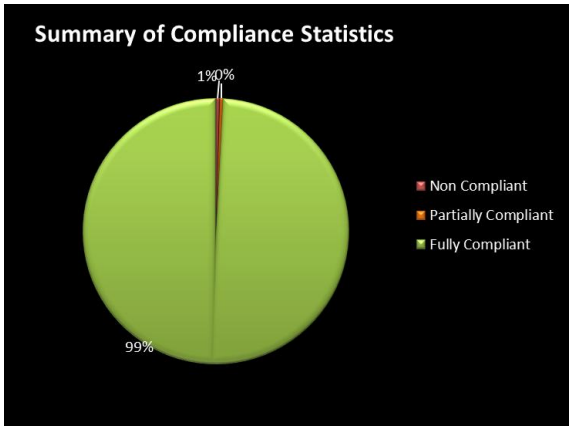


Figure 21: Summary of compliance with the requirements of the Impofu East EMPr (Power Construction).

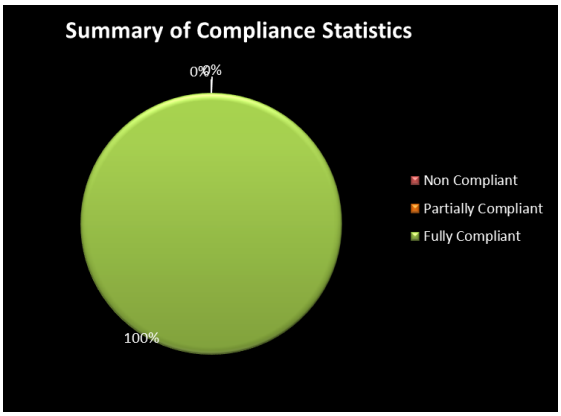


Figure 22: Summary of compliance with the requirements of the Impofu North EA (Power Construction).

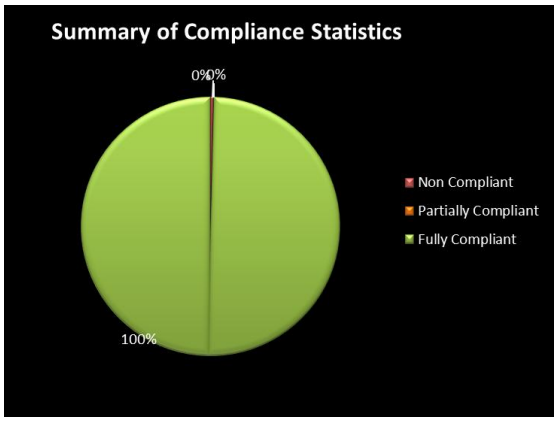


Figure 23: Summary of compliance with the requirements of the Impofu North EMPr (Power Construction).

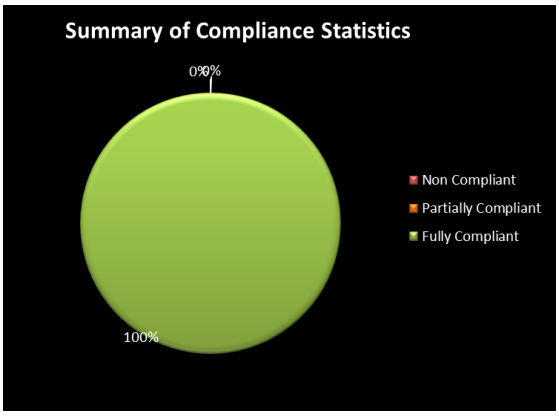


Figure 24: Summary of compliance with the requirements of the Impofu North EA (Nordex).

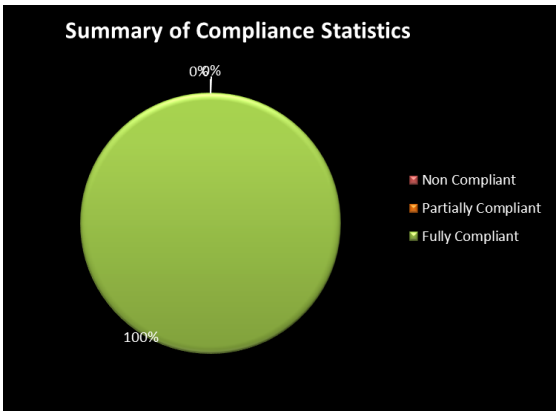


Figure 25: Summary of compliance with the requirements of the Impofu North EMPr (Nordex).

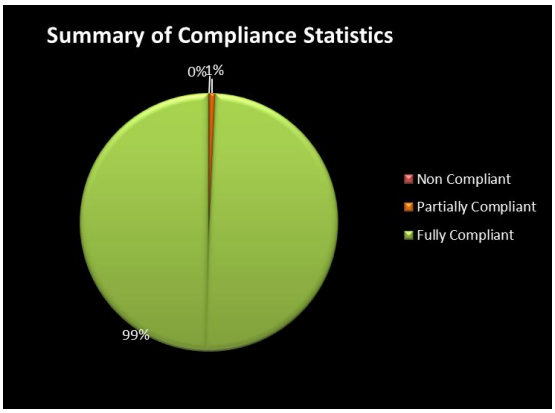


Figure 26: Summary of compliance with the requirements of the Impofu West EA (Nordex).

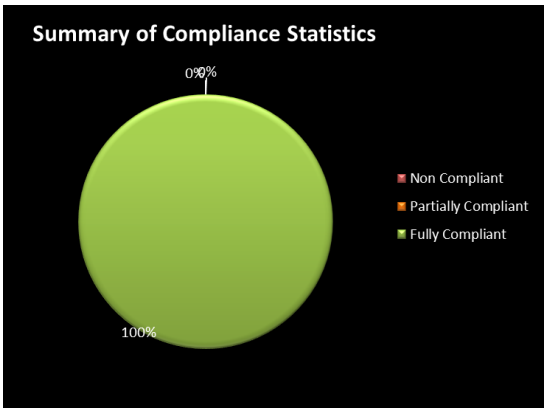


Figure 27: Summary of compliance with the requirements of the Impofu West EMPr (Nordex).

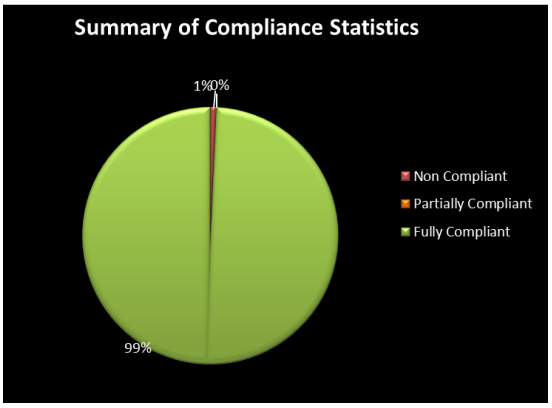


Figure 28: Summary of compliance with the requirements of the Impofu East EA (Nordex).

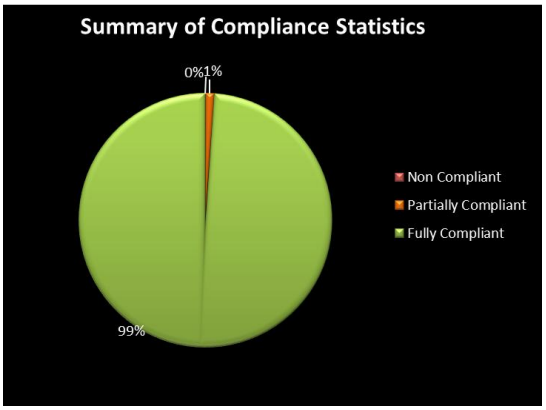


Figure 29: Summary of compliance with the requirements of the Impofu East EMPr (Nordex).

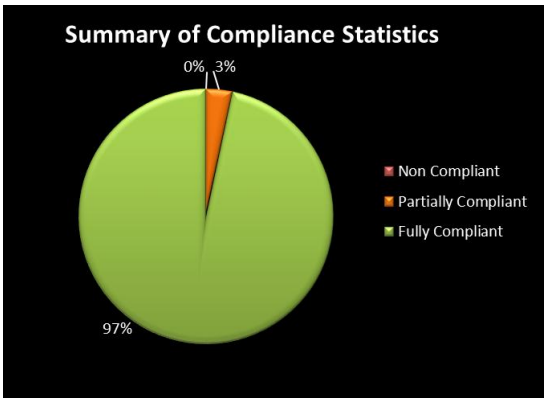


Figure 30: Summary of compliance with the requirements of the Buffer Yard EA (Nordex).

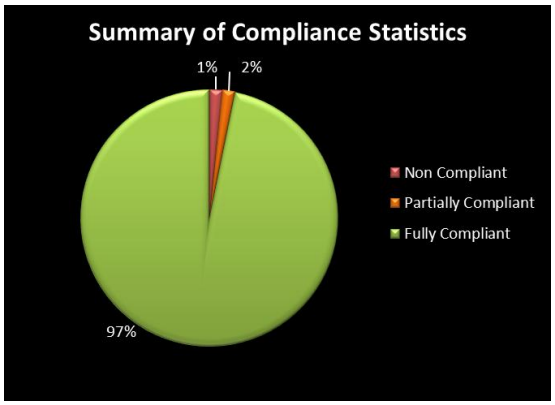


Figure 31: Summary of compliance with the requirements of the Buffer Yard EMPr (Nordex).

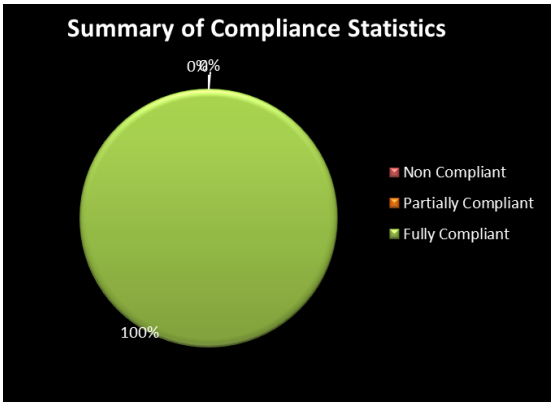


Figure 32: Summary of compliance with the requirements of the Substations EMPr (Brand Besamandla).

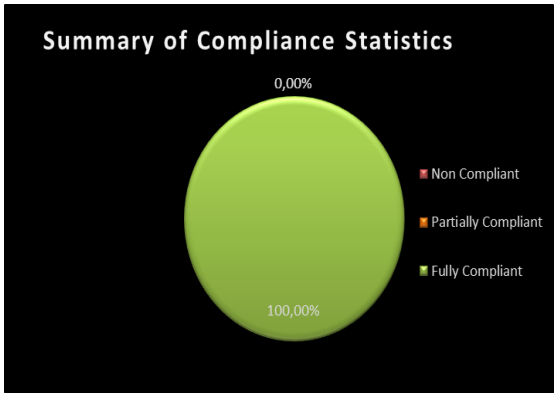
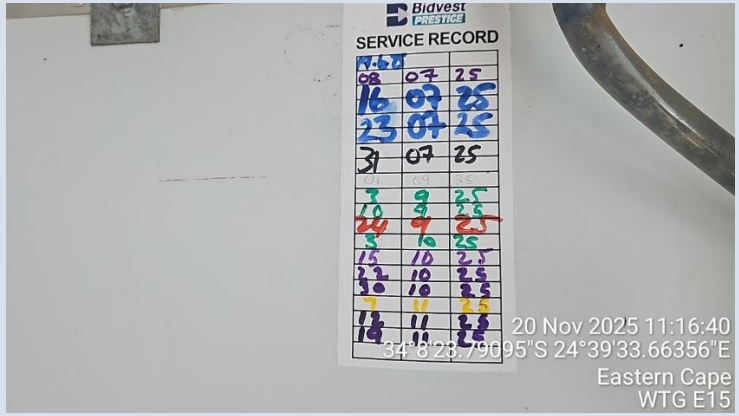


Figure 33: Summary of compliance with the requirements of the Water Use Authorisations (GA) (Power Construction).

5.2 GOOD COMPLIANCES

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

Location	Category	Responsible Party	Description	Photo Reference
Impofu East Wind Farm	Heritage Resource Protection	Power Construction	The archaeological site at Impofu East Wind Farm was observed without disturbances. Additionally, the fence demarcation and 'no-go area' signs were maintained upright.	 Figure 34: Fence and signage at the archaeological site at Impofu East Wind Farm well maintained.

Location	Category	Responsible Party	Description	Photo Reference
Impofu East Substation	Awareness	Brand Besamandla	The Site Management Information (SMI) was observed with updated information at Impofu East Substation. Awareness talks on the prevalence of snakes in the summer season was emphasized, particularly with the de-mobilization of laydown areas.	 Figure 35: SMI Board constantly updated by Brand Besamandla at Impofu East Substation.
WTG E15, Impofu East Wind Farm	Sanitation	Nordex	The toilet service register was maintained up to date by the contractor and service provider.	 Figure 36: Ablution unit register up to date at a Nordex work area.

Location	Category	Responsible Party	Description	Photo Reference
Warehouse	Housekeeping	Nordex	Housekeeping was observed underway at the Nordex Warehouse. According to the EO, the constant unboxing of material contributed to the skip getting full fast.	 Figure 37: Housekeeping observed at the Nordex Warehouse.
Impofu West Wind Farm	Erosion Control	Power Construction	During site inspection, rock dissipaters within V-drains were observed covered with hessian to ensure silt is captured and to reduce the velocity of surface water run-off. This was to try and ensure maximum effectiveness of rock dissipaters on stormwater channels.	 Figure 38: Hessian weave on rock dissipators for stormwater control.

5.3 AREAS OF CONCERN

Three (03) new concerns were raised by the ECO during the current reporting period. During audit inspection at the buffer yard, wood waste observed stockpiled too high once again, and the community coming in for donation was climbing to the top of that stockpile to salvage good wood. This is not the first or second instance this was raised with Nordex.

At the warehouse, spillages were observed around the generator used to power Nordex offices on two separate site inspections. The EO was notified and the team consistently removes the contaminated soil to store in a hazardous bin. During the audit inspection, one employee indicated that the cause of these spillages was over-filling the generator and as such, has to siphon out the excess diesel. This diesel is stored inside the shipping container until it is transferred to the drum at the buffer yard.

Lastly, the ECO has noticed on two separate inspections that de-watering activities by Power Construction occur without silt traps. When this was raised with the Environmental Manager, action was taken immediately to rectify this. Although these activities are not always near watercourses, the ECO recommends it as good practice to make sure a silt trap is in place if risk assessment was not accurate.

Concerns raised in the previous period were addressed with urgency and are being monitored closely. The jockey wheels the mobile toilets for Power Construction were fixed, whereas the toilets belonging to Nordex are stabilized on square wooden poles. 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 39: Mobile toilet unit balanced on wooden poles.



Figure 40: Community gathering wood donation at the top of a high stockpile at the Buffer Yard.



Figure 41: Diesel spillage from refuelling the generator.



Figure 42: De-watering of WTG W10 turbine base

5.4 NON-COMPLIANCES

Fourteen (14) new non-compliances were raised during this reporting period, and two (02) 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.

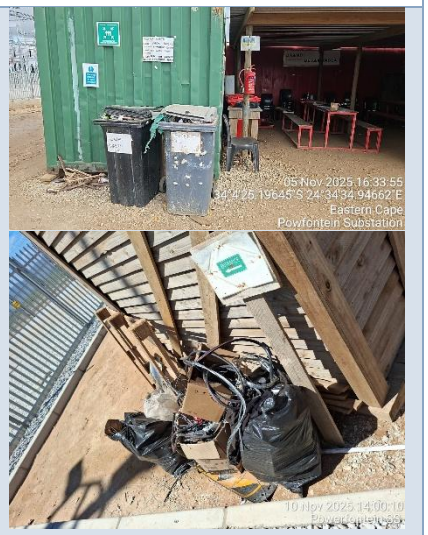
Table 3: Environmental Non-Compliances raised during the current reporting period.

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
099	EMPr 5.3.4.2 **For Power Construction**	Should portable/chemical toilets be used then these shall be used and maintained in such a way that they do not cause water or other pollution: • No toilet facilities shall be located closer than 50 m to any water body • Toilets shall be adequately secured to the ground to prevent them from toppling due to wind or any other cause. • Adequate toilet paper, and hand sanitiser or soap shall be provided.	During site inspection, the mobile toilet at a work area was observed with a broken jockey wheel. This made the toilet unit difficult to use. The SHE representative indicated that this has been reported already.	Mobile toilets shall be inspected frequently and adequately secured to the ground at all times.	**Closed Out/ Corrected** The mobile toilet was fixed by the next site visit to the same team, which was approximately a week later.	 Figure 43: Mobile toilet adequately secured to the ground.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
100	EA 108 EA 114 EMPr 5.3.9.8 **For Nordex**	Leakage of fuel must be avoided at all times and if spillage occurs, it must be remedied immediately. Spill kits must be made available on-site for the clean-up of spills. Should regular refuelling on site be necessary, then provision shall be made for a dedicated refuelling station at the fuel storage area: • The impermeable, bunded fuel storage area shall also accommodate refuelling activities. • The proper dispensing equipment shall be used, and the drum shall not be tipped in order to dispense fuel. • A supply of absorbent material (e.g. Spill Sorb or Enretech #1 powder or equivalent) shall be readily available to absorb, break down and encapsulate minor hydrocarbon spillage. The quantity of such material shall be able to handle a minimum of 200 litres of hydrocarbon liquid spill per incident	During site inspection, fresh diesel spillages were observed at WTG E17 following the refuelling of the generator. Additional spillages were observed during the ECO audit inspection. Although the generator is said to have a built-in drip tray, the spillages suggest that there were additional no preventative measures in place during refuelling.	The Contractor shall continuously implement preventative action to safeguard environmental integrity and prevent pollution.	**Closed Out/ Corrected** According to the Contractor EO, the responsible subcontractor (Johnson Aguado) confirmed that the spillage was cleaned OilCap was also applied for neutralization.	  Figure 44: Diesel spillages noted at WTG E17.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
101	EMPr 5.23 **For Brand Besamandla**	Designate smoking areas where the fire hazard could be regarded as insignificant	The smoking area at Impofu North Substation was observed with a fire extinguisher which was low on pressure, although up to service.	Fire extinguishers and fire-fighting equipment (in terms of the OHSA) are to be strategically placed at the site office / camp, laydown areas, and on site where required. All staff are to be made aware of their locations and purposes and trained in their basic use.	**Closed Out/Corrected** The smoking area was equipped with a new fire extinguisher by the following week.	 Figure 45: Fire extinguisher with low pressure has been replaced.
102	EA 108 EMPr 5.2.1.11 **For Power Construction** EMPr 5.3.10.2	Leakage of fuel must be avoided at all times and if spillage occurs, it must be remedied immediately. All construction materials including fuels and oil should be stored in demarcated areas that are contained within berms / bunds to avoid spread of any contamination. Washing and cleaning of equipment should also be done in berms or bunds, in order to trap any cement and prevent excessive soil erosion. Cement powder has a high pH, and spillage of cement powder and concrete slurry can affect soil and water pH. Spillage on permeable	Spillage of cement powder was observed at Impofu West Substation. During a separate site inspection, the delivery concrete truck was observed cleaning the equipment on site. Although this was done at the "rubble area", there remained the risk contaminated water flowing to the open culvert right beside it.	Where 'readymix' concrete is used, delivery vehicle shall not wash chutes onsite, unless at a designated area where such water can be collected and disposed of as water containing waste. Similarly drum wash shall not be disposed of onsite unless into a contaminated water pond/facility. Any spillage from 'readymix' delivery shall be immediately	**Closed Out/Corrected** The cement powder was relocated to the substation platform	  Figure 46: Soil contamination from cement powder was rectified at Impofu West Substation.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		surfaces shall be prevented, and cement laden water/runoff shall be collected and disposed of as water containing waste.		collected and disposed of as builder's waste		
103	EMPr 5.8 **For Brand Besamadla**	All measures regarding waste management must be undertaken using an integrated waste management approach; Bins must be emptied regularly;	During site inspection, Powfontein Substation was observed with full waste bins and reported with improper waste storage at the security entrance. This was attributed, in part, to the preparations for energization and the Contractor's decision to reduce the staff.	Waste shall be removed daily from areas remote from camp and transferred to the appropriate waste storage facility.	**Closed Out/Corrected** The waste was removed from site to Power's site camp for later disposal.	 Figure 47: Full waste bins and improperly stored was cables observed at Powfontein Substation.
104	EA 110 **For Nordex**	No dumping or temporary storage of any materials must take place outside the designated or demarcated laydown areas, and these must be located within areas of environmentally low sensitivity.	During site inspection, a mix of general waste and hydrocarbon containing waste was observed hidden behind delivery trucks at WTG E17. Some of the plastics has already	Appropriate general waste (e.g. construction debris, rubble, timber, tins, drums and domestic waste) collection, storage and removal	**Closed Out/Corrected** On Friday, the 14th of November 2025, a site-	

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
	EMP Objective 11 **For Nordex**	Waste must be stored in accordance with the relevant legislative requirements. Waste management must be a priority and all waste must be collected and stored adequately.	blown across the farmlands, and caught on the fences.	from site shall be implemented. Waste shall be removed daily from areas remote from camp and transferred to the appropriate waste storage facility.	wide litter picking initiative was conducted to clean Nordex work areas.	 Figure 48: Nordex work area was observed in a horrendous state and litter blown across the farm.
105	EMPr 5.3.9.8 **For Power Construction**	Should regular refuelling on site be necessary, then provision shall be made for a dedicated refuelling station at the fuel storage area: • A supply of absorbent material (e.g. Spill Sorb or Enretech #1 powder or equivalent) shall be readily available to absorb, break down and encapsulate minor hydrocarbon spillage. The quantity of such material shall be able to handle a minimum of 200 litres of hydrocarbon liquid spill per incident	On the 18th of November 2025 before the audit inspection, the EO from Power Construction reported that there were minor spillages at the site camp from the previous day. These were from the mobile diesel bowser	The contractor should conduct inspection in order to clean-up spillages promptly and also ensure that drip tray is placed under parked machinery as well as during refuelling. Diesel bowser should be situated on a smooth impermeable surface.	**Closed Out/Corrected** OilCap was applied immediately.	 Figure 49: Application of OilCap to diesel spillages at Power's site camp.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
106	EA 110 **For Nordex** EMPr Objective 11 **For Nordex**	No dumping or temporary storage of any materials must take place outside the designated or demarcated laydown areas, and these must be located within areas of environmentally low sensitivity. 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, empty hazardous chemical containers were observed outside the bund and the hazardous waste skip was observed with general waste inside.	The Contractor shall conduct regular inspections and continuously coach the subcontractors on the importance of managing hazardous waste according the relevant legislation.	**Work In Progress (WIP)** During the ECO audit inspection, the empty hydrocarbon containers were stored correctly inside the bund. However, the liquid hazardous waste was not properly sealed and the bund area still required additional housekeeping.	 Figure 50: Bund area and hazardous waste at the buffer yard poorly maintained.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
107	EMPr 5.5.1.31 **For Brand Besamandla**	Monitor the re-growth of vegetative material, and address issues of erosion, trampling, and grazing accordingly.	During the ECO audit inspection, an employee was observed walking on topsoil after it was re-instated at East Substation. Three substations later, and this remains a challenge on site.	An "environmentally sensitive" signage shall be placed in addition to the one already in place.	**Closed Out/Corrected** Additional signage was placed on the topsoil. Compaction of the topsoil needs to be closely monitored.	 Figure 51: Employee walking on re-instated topsoil at Impofu East Substation.
108	EMPr 5.8 **For Brand Besamandla**	All measures regarding waste management must be undertaken using an integrated waste management approach	On the 8th of November 2025, it was observed during site inspection that the bin formerly used for washing cement bags was filled with a mixture of general waste. The cement mixing activities have long ceased but the bin was not disposed corrected. During audit inspection on the 18th of November 2025, this non-conformance was still not corrected.	Waste management must be a priority and all waste must be collected and stored adequately. General waste much be segregated from the probable cement-laden water.	**Closed Out/Corrected** During housekeeping and demobilization, the bin was removed from site. The Environmental Manager did not report on how the water was disposed.	 Figure 52: General waste mixed with cement-laden water at Impofu East Substation.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
109	EMPr 5.8 EMPr 5.3.15.12 **For Brand Besamandla**	All measures regarding waste management must be undertaken using an integrated waste management approach; 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 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.	Oil contaminated water from the generator which was used on North Substation was temporarily stored in a wheelie bin	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 to relevant legislation.	**Closed Out/Corrected** After the water was allowed to evaporate for two weeks, only oil was left behind. Peat fibre was used to absorb the oil and stored in plastics, to be disposed as solid hazardous waste. Photographic evidence was submitted to the ECO.	 Figure 53: Oil contaminated rainwater from the generator at Impofu North Substation stored in a wheelie bin.
110	EMPr Objective 2 **For Nordex**	Regular toolbox talks must be undertaken to ensure appropriate levels of environmental awareness.	The was no toolbox talk submitted by the subcontractor (JAW) for current reporting period. Only by EMPA who left the site at the end of October.	It is recommended that the contractor ensures regular environmental awareness and training is conducted on site. This is important to stay up	**Open/Uncorrected**	N/A

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
				to date with changing conditions, and maintaining emergency preparedness.		
111	EMPr Objective 4 **For Nordex**	Contractor must provide adequate firefighting equipment on site and provide firefighting training to selected construction staff.	During the audit inspection at the buffer yard, the fire extinguisher was observed with low pressure once again. This issue was raised as a concern during the previous reporting period, as this unit is unfit for use in case of emergency.	With the wood waste stockpiled at the buffer yard, and employees smoking close to the diesel tank, it is imperative that the fire extinguishers are maintained in good functioning order.	**Closed Out/Corrected** The contractor argued that the diesel truck has a fire extinguisher that is in good condition. Additionally, the fire extinguisher in question was for a non-functional smoking area so it was removed.	 Figure 54: Fire extinguisher with low pressure at the buffer yard removed completely.
112	EMPr 5.3.4.1 **For Power Construction**	The Contractor shall submit a Method Statement for Ablution Facilities, which shall address washing facilities (including methods for managing grey water) and toilets (including the number of, location and method of securing portable/chemical toilets to the ground (if not trailer versions), the	During the audit inspection, it was observed that at least two teams at North Substation were without ablution facilities. The employees indicated that they call a taxi to take	The ECO suggested that at least one vehicle is available immediately at the work area where an ablution facility is not. The absence of both an ablution unit and a vehicle is a health,	**Closed Out/Corrected** During various site inspections, it was observed that the teams were provided with ablution	N/A

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		proposed service providers and their service schedule). •A sufficient number of toilets shall be provided for the site staff at a ratio of not less than 1 toilet per 15 people. •Toilet facilities shall be located within the contractor's camp and at work areas remote from the camp.	them to the nearest mobile toilet.	safety and environmental risk.	facilities and at least one vehicle if one was not available.	
113	EA 110 **For Brand Besamandla** EA 115 **For Brand Besamandla** EMPr 5.3.15.6	No dumping or temporary storage of any materials may take place outside designated and demarcated laydown areas, and these must all be located within areas of low environmental sensitivity. An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal where appropriate. Where any soldi waste is disposed of, such disposal shall only occur at a licensed landfill in terms of section 20(b) of the National Environmental Waste Act 2008 (Act 59 of 2008). Appropriate general waste (e.g. construction debris, rubble, timber, tins, drums and domestic waste)	On the 14th of November 2025, at Impofu West Wind Farm the ECO requested for the removal of sandbags which were previously used to keep signage upright if they were no longer in use. On the 18th of November 2025, during audit inspection, these were still observed on site and not in use. The lack of urgency to the raised issue suggest negligence of not only the EA/EMPr condition, but also their duty of care toward environmental protection.	Littering and pollution shall be avoided on site. Appropriate removal of waste from site shall be implemented.	**Closed Out/Corrected** Two weeks later, the sand bags were removed from site.	 Figure 55: Sand bags and water bottle discarded close to a stormwater culvert at Impofu West Wind Farm.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
	For Brand Besamandla	collection, storage and removal from site shall be implemented.				

5.5 NON-COMPLIANCE REPORTS

Non-Compliance Reports (NCRs) are issued to the project or relevant contractor if the recorded NCs are not addressed in the agreed timeframes. One (01) NCR was issued during the current reporting period. This was issued to Nordex for storing contaminated soil at the buffer yard for extended periods, which progressed to mixing of waste. One week later, the EO submitted photographic evidence of the contaminated soil being removed from site. The corrective action reports (CAR) are a work in progress.

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
048	EMPr 5.4.1.2 **For both Brand Besaman**	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	Landowners have been complaining about contractors not adhering to gate management. Gates management has not	The contractor should always adhere to landowners' gate management protocols and ensure that all gates	**Work in progress** Major construction activities by the responsible	N/A

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
	dla and Nordex EMPr 5.4.2.1 **For both Brand Besamandla, and Nordex**	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.	been done properly, gates have been reported left open, and cows end up mixing.	are closed when they leave site after a shift.	Contractors have been completed and no new evidence of landowner complaints have been submitted by the Contractor EO's. The last update provided by the employees was in September 2025.	

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.	**Closed Out/Corrected** The construction of the hazardous chemical storage has been completed by Nordex. The corrective at NCR corrective action report has not been submitted by the Contractor.	 Figure 56: Construction of HCS storage area completed and in use by Nordex.

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
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 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.	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.	**Closed Out/Corrected** The EO reported that the cloths were cleaned from site and disposed as hazardous waste.	 Figure 57: Cloths from the mobile chemical toilets poorly disposed.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
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.	**Closed Out/Corrected** New signage to indicate the hazardous and general waste area was observed at the Buffer Yard.	 Figure 58: Labelling of hazard waste area at the buffer yard.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
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 storages areas in the Contractor's camp, or directly transferred to an approved landfill.	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.	**Closed Out/Corrected** Plastic waste has been removed from the wire fence. The fence will be donated since they cannot be disposed.	 Figure 59: Housekeeping at the site camp has improved amid site de-establishment.
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.	**Closed-Out/Corrected** The Contractor EO reported that the contractor EO reported that the contaminated soil was cleaned and taken to the buffer yard on the 15th of	 Figure 60: HCS spillages noted at Impofu WTG E15.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
					November 2025. This was verified during the audit inspection.	

5.8 INCIDENTS

Three (03) incidents were reported during the current reporting period. On the 04th of November 2025, Nordex reported approximately 5 L of diesel spillage that occurred at WTG E11. This was a result of the theft of tyres of the generator that was reported the previous day. According to the contractor, the spillage was cleaned immediately upon awareness of the incident, and the contaminated soil was stored in the waste skip at the buffer yard. On the 7th of November 2025, cement-laden water that was used to wash gravel at Impofu East Substation was disposed of on re-instated topsoil. The contaminated soil was cleaned and disposed as waste. The area was then scarified as waste.

On the 14th of November 2025, Brand Besamandla reported a small spillage at Impofu East Substation. A hydraulic pipe burst onto the concrete platform and a drip tray was immediately place underneath the plant. OilCap was then applied on the concrete and peet fibre was used to clean the drip tray. This was stored in the waste bin which was taken to the site camp. 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**	**39**	**1**
Non-compliances	**14**	**112**	**4**
Non-compliance Reports	**1**	**3**	1
Incidents	**3**	**37**	**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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