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DECEMBER 2025 MONTHLY ECO AUDIT REPORT

IMPOFU CLUSTER WIND ENERGY FACILITY

DEA Reference Numbers:

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



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List of Abbreviations

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

Definitions

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



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

1 INTRODUCTION

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

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

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

This report provides details of the outcome of an environmental compliance audit for the month of 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.

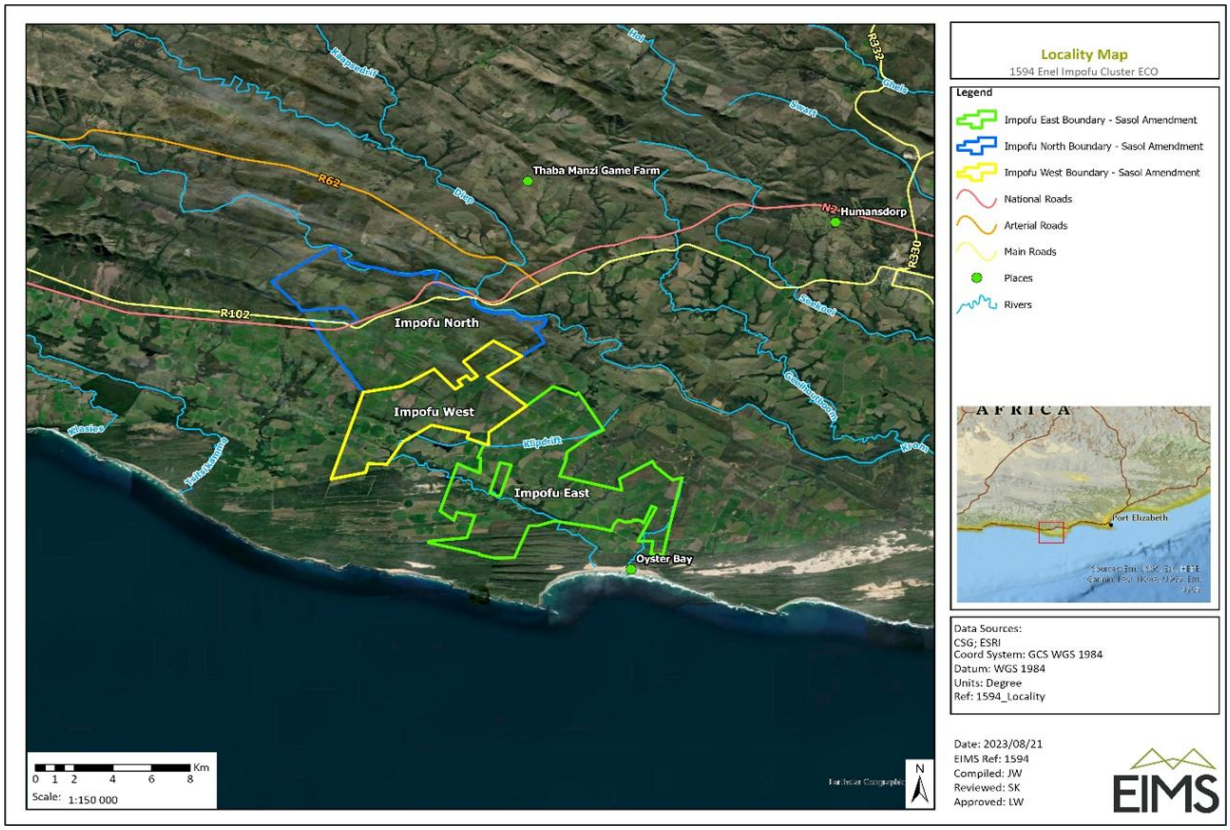


Figure 1: Impofu Cluster boundaries.

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. 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. As the month of November 2025 was coming to an end, so were the activities Impofu East and West Wind Farm. Subcontractors such as M&T and Imvelenhle are off-site. The Contractors put the necessary measures in place to ensure that the site is safe during temporary closure of the site during December 2025

The construction of all four substations was completed during the current reporting period. Commissioning and testing are currently underway. Power construction is

- 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.

3.1 APPLICABLE STANDARDS

The scope of the compliance monitoring was also to confirm the projects' compliance with the "Lenders Requirements" defined as:

- Equator Principles III dated 2013;
- IFC Performance Standards dated 2012; and
- World Bank Environmental Health & Safety (EHS) Guidelines;
  - General EHS Guidelines dated 30 April 2007;
  - EHS Guidelines for Wind Energy dated August 7, 2015.

3.1.1 EQUATOR PRINCIPLES

The Equator Principles are a credit risk management framework for determining, assessing, and managing environmental and social risk in project finance transactions. The signatories of the Equator Principles believe that adoption of, and adherence to, these principles offer significant benefits to the financiers, their customers, and other stakeholders. These principles will foster the ability of financiers to document and manage their risk exposures to environmental and social matters associated with the projects they finance, thereby allowing them to engage proactively with their stakeholders on environmental and social policy issues.

Adherence to these principles will allow the financiers to work with their customers in their management of environmental and social policy issues. The adopting institutions view these principles as a framework for developing individual, internal practices and policies, and are doing so voluntarily and independently. This review utilised Equator Principles III (or EPIII) which came into effect on 4th June 2013.

Principle 1: Review and Categorization: including legal review and due diligence.

Principle 2: Social and Environmental Assessment: includes a requirement to carry out a comprehensive environmental and social assessment to identify and address (including mitigation) environmental and social issues.

Principle 3: Applicable Environmental and Social Standards: including alignment with the IFC Performance standards and applicable industry specific EHS Guidelines and compliance with relevant host country laws, regulations and permits that pertain to social and environmental matters.

Principle 4: Environmental and Social Management System and Equator Principles Action Plan: Typically requires development of a Social and Environmental Management System that addresses the management of the impacts, risks, and corrective actions required. An action plan must be developed to address gaps identified in the independent review.

Principle 5: Stakeholder Engagement: includes the requirement to ensure public is provided with free, prior, and informed consultation and facilitate their informed participation as a means to establish whether a project has adequately incorporated affected communities' concerns.

Principle 6: Grievance Mechanism: requires assurance that consultation, disclosure, and community engagement continue throughout construction and operation of the project.

Principle 7: Independent Review: Requires that an independent social or environmental expert not directly associated with the borrower will review the assessment and consultation process documentation in order to ensure compliance with these principles.

Principle 8: Covenants: This typically refers to obligations on the person lending or applying for finance. This review will assist in determining the applicable covenants for this project.

Principle 9: Independent Monitoring and Reporting: Requires that monitoring be carried out by an independent environmental and/or social expert. Allocation should be made for such an independent person in the EMP's for construction and operation.

Principle 10: Reporting and Transparency: The client will ensure that the ESIA is accessible and available online. The client will also report on GHG emissions for project emitting over 100 000 tonnes of CO^2 equivalent annually. Each EPFI adopting the Equator Principles commits to report publicly at least annually about its Equator Principles implementation processes and experience.

3.1.2 IFC STANDARDS

IFC's Performance Standards are directed at providing guidance on how to identify risks and impacts, and are designed to help avoid, mitigate, and manage risks and impacts as a way of doing business in a sustainable way. These include stakeholder engagement and disclosure obligations of the client in relation to project-level activities. IFC uses the Sustainability Framework along with other strategies, policies, and initiatives to direct the business activities of the Corporation in order to achieve its overall development objectives. The Environmental, Health, and Safety (EHS) Guidelines provide performance levels and measures for compliance with the Performance Standards.

In addition to meeting the IFC Performance Standards, clients must comply with applicable national law, including those laws implementing host country obligations under international law. When host country regulations differ from the levels and measures presented in the EHS, projects are expected to achieve whichever is more stringent. This review is based on the 2012 IFC Performance Standards. The IFC Performance Standards applicable to this project are listed below with very brief summaries:

Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts: Requires the development of an Environmental and Social Management System to address the management and mitigation of risks and impacts identified, and corrective actions required. The Environmental and Social Management System (ESMS) entails a methodological approach to managing environmental and social risks and impacts in a structured way on an ongoing basis. A good ESMS appropriate to the nature and scale of the project promotes sound and sustainable environmental and social performance.

Performance Standard 2: Labour and Working Conditions: Requires the implementation of human resources policies and procedures relevant to the size and workforce of the client and is consistent with the requirements of the Performance Standards. The pursuit of economic growth through employment creation and income generation should be accompanied by protection of the fundamental rights of workers.

Performance Standard 3: Resource Efficiency and Pollution Prevention: Generally, requires the application of technically and financially feasible resource efficiency and pollution prevention principles and techniques to avoid or minimise adverse impacts on human health and the environment. Reference should be made to the EHS guidelines or other internationally recognised sources during the evaluation and selection process.

Performance Standard 4: Community Health, Safety, and Security: Requires identification of risks and impacts to the health and safety of Affected Communities and the proposal of mitigation measures commensurate with magnitude and nature.

Performance Standard 8: Cultural Heritage: The client is required to comply with applicable legislation regarding the protection of cultural heritage, including implementation of the host country's obligations under the Convention Concerning the Protection of the World Cultural and Natural Heritage. Internationally recognised methods for the protection, field study, and documentation of cultural heritage are to be implemented.

3.1.3 WORLD BANK EHS GUIDELINES

The World Bank EHS Guidelines are technical reference documents with general and industry specific examples of Good International Industry Practice (GIIP). When one or more members of the World Bank Group are involved in a project, these EHS Guidelines are applied as required by their respective policies and standards. When host country regulations differ from the levels and measures presented in the EHS Guidelines, projects are expected to achieve whichever is more stringent. This review utilised the latest World Bank EHS Guidelines applicable to Wind Energy projects, namely:

- General EHS Guidelines dated 30 April 2007.
- EHS Guidelines for Wind Energy dated 7 August 2015.

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, noise and dust monitoring (if any);
- 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.
- The 5th amendment of Condition 98 of the EA for mural painting on Turbine E1 (reference Number: 14/12/16/3/3/2/1104/AM5) was approved by DFFE on the 11th of November 2025.
- The 5th amendment of Condition 98 of the EA for mural painting on Turbine N4 (reference Number: 14/12/16/3/3/2/1102/AM5) was approved by DFFE on the 11th of November 2025.
- The 5th amendment of Condition 98 of the EA for mural painting on Turbine W2 (reference Number: 14/12/16/3/3/2/1103/AM5) was approved by DFFE on the 11th of November 2025

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 24 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. No general wast was disposed by Brand Besamandla between the 11th of November and 5th of December 2025. The ECO advises 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 39 m^3 of general waste was removed from Nordex sites during the current reporting period. This is a decrease from the previous 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 6 m^3 of solid hazardous waste was removed from the buffer yard. Additionally, a total of 510 L of used oil was removed by 'Oil Oil Boys' from Nordex sites. Power Construction did not remove any hazardous waste 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.

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 2.82 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 0.24 m^3 of effluent was collected for disposal during the current reporting period.

The conservancy tank at Nordex site camp was serviced once during the current reporting period, with Mandsons collecting 10 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 1.76 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

Water extraction for Power, Besamandla, and Nordex is done on the Steynberg and Vermaak boreholes. Water from the boreholes is mainly used for to flush toilets at the site camps and dust suppression activities have greatly been reduced.

Based on the information provided to the ECO, borehole water abstraction monitoring results from Power between the 24th of November 2025 and 08th of December 2025 are as follows:

Farm name	October (m^3)	November (m^3)	December (m^3)	Total abstracted from 11 January to 08 December 2025 (m^3)
Steynberg	937	789	369	18 530
Biggs	0	0	0	5 064
Cilliers	0	0	0	18 529
Vermaak	86	0	715	7 450
Masterson	0	0	0	9 983

Total (m^3)	**1 023**	**789**	**1 084**	

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 08th and 09th of December 2025. Activities for the current reporting period include the following:

- **Foundations**: WTG recess and duct trenching, de-watering WTG excavations, preparation and painting of WTG plinths, of as well as rigid inclusions remedial works.
- **Crane pads and platforms**: Rehabilitation of blade fingers.
- **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**: Electrical trenches and tie-In on Bases, 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. The activities underway include the following:

- **West Substation**:
    - Final fix on Eskom and IPP relay buildings.
    - Installation of equipment clamps ongoing.
    - Final fix in O&M building.
    - Brickwork and final fix warehouse.
    - Cold commissioning.
    - Final punch items on perimeter works, ie hessian / drains / storm water canals / etc.
    - Substation energized.
- **Powfontein Substation**:
    - Decommissioning of laydown area.
    - Substation energized.
- **North Substation**:
    - Rehabilitation of laydown area.
    - Final works at the O&M Building, including paint and furniture.
    - Termination of fibre cables.
- **East Substation**:
    - Final painting of the hazardous waste, O&M, IPP, and Eskom buildings.
    - Substation energized.
- **MV Cable installation**
    - Cable installation and backfilling at Impofu West Wind Farm.

Nordex is mainly engaged in commissioning and post-tensioning activities inside the turbines.



Figure 2: Erosion on the edge of buffer yard platform.



Figure 3: Dust generated due to high winds around the buffer yard.



Figure 4: Hazardous liquids stored improperly at the buffer yard.



Figure 5: Weed growth around sand bags for keystones.



Figure 6: Warehouse for Nordex neat and tidy.



Figure 7: Route markers and vegetation cleared for stormwater channel diversion away from the access road.



Figure 8: Removal of wood waste from the Powfontein Substation laydown area.



Figure 9: Topsoil re-instated at Impofu North Substation.



Figure 10: Servicing of ablution facilities at Impofu North Wind Farm.



Figure 11: Trench at WTG 18 tightly barricaded.



Figure 12: Bees noted on conductor drum at WTG E8 were removed by a trained specialist.



Figure 13: Housekeeping of Impofu East Substation.



Figure 14: Cable installation at WTG E14.



Figure 15: WTG E13 trench filled with water and not barricaded sufficiently.



Figure 16: Mural painting at WTG N4.



Figure 17: Artist name of mural painting at WTG W2.



Figure 18: Topsoil reinstated at WTG E5.



Figure 19: Culvert pipe filled with sand and litter at WTG E1.

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.

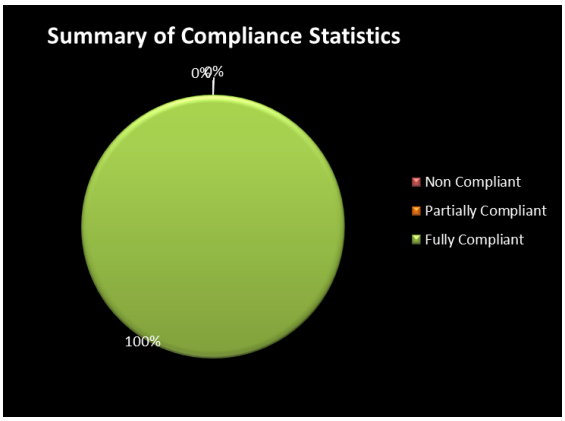


Figure 20: Summary of compliance with the requirements of the Impofu West EA (Power Construction).

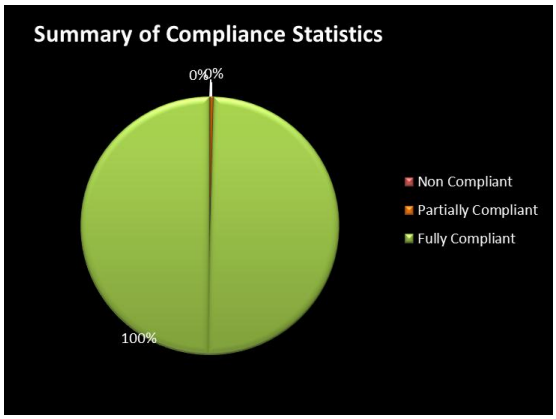


Figure 21: Summary of compliance with the requirements of the Impofu West EMPr (Power Construction).

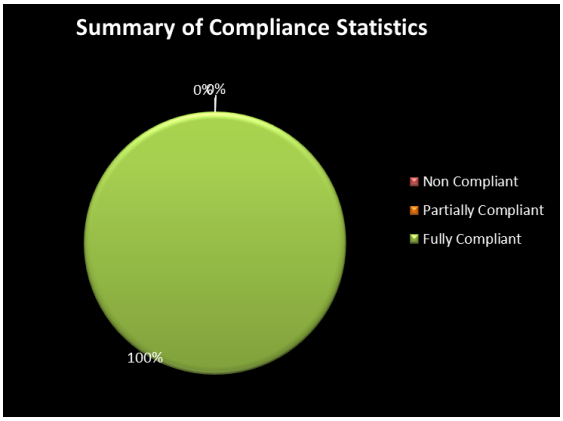


Figure 22: Summary of compliance with the requirements of the Impofu East EA (Power Construction).

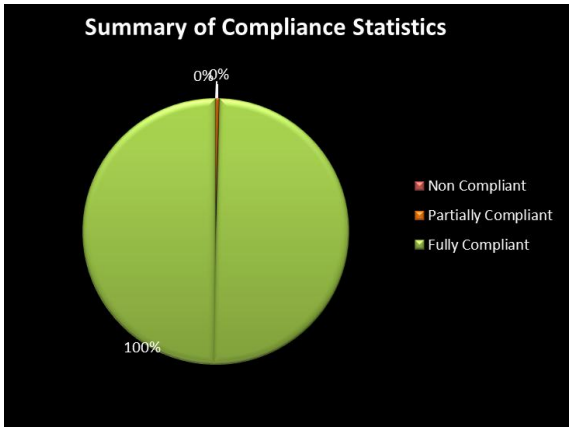


Figure 23: Summary of compliance with the requirements of the Impofu East EMPr (Power Construction).

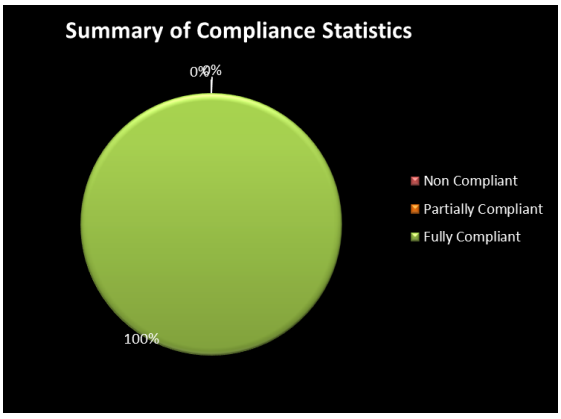


Figure 24: Summary of compliance with the requirements of the Impofu North EA (Power Construction).

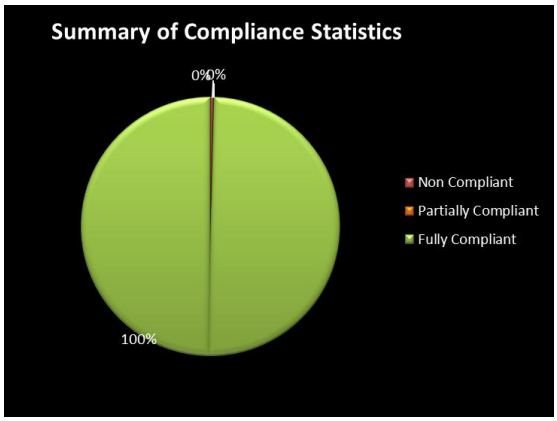


Figure 25: Summary of compliance with the requirements of the Impofu North EMPr (Power Construction).

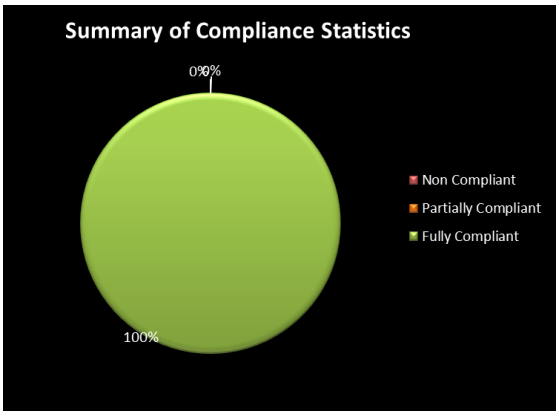


Figure 26: Summary of compliance with the requirements of the Impofu North EA (Nordex).

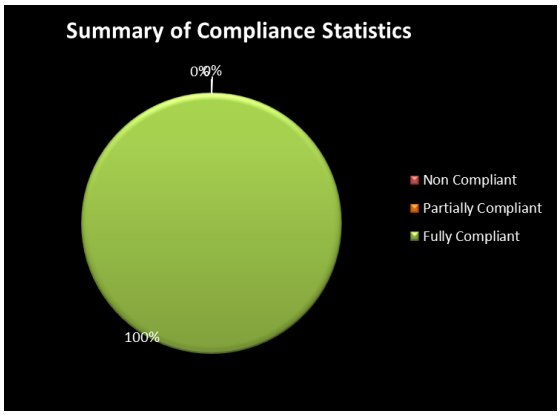


Figure 27: Summary of compliance with the requirements of the Impofu North EMPr (Nordex).

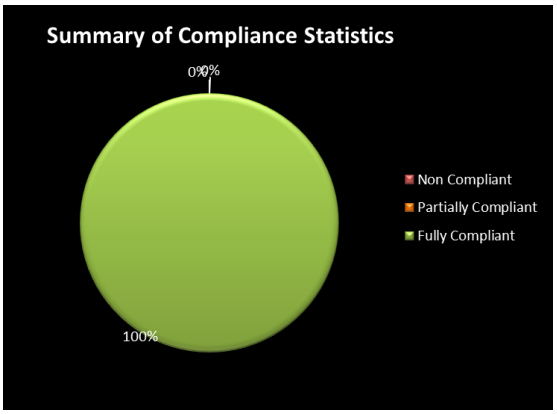


Figure 28: Summary of compliance with the requirements of the Impofu West EA (Nordex).

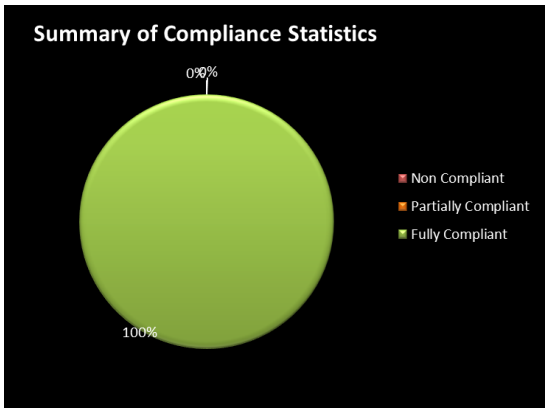


Figure 29: Summary of compliance with the requirements of the Impofu West EMPr (Nordex).

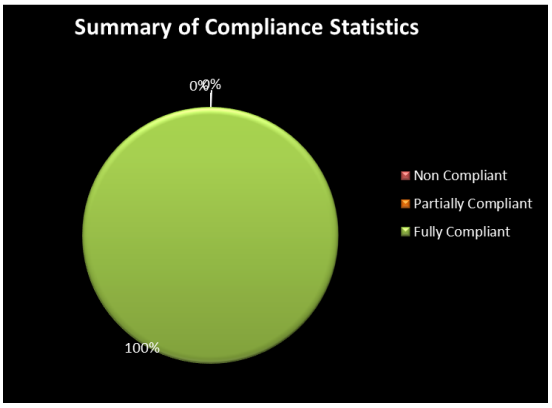


Figure 30: Summary of compliance with the requirements of the Impofu East EA (Nordex).

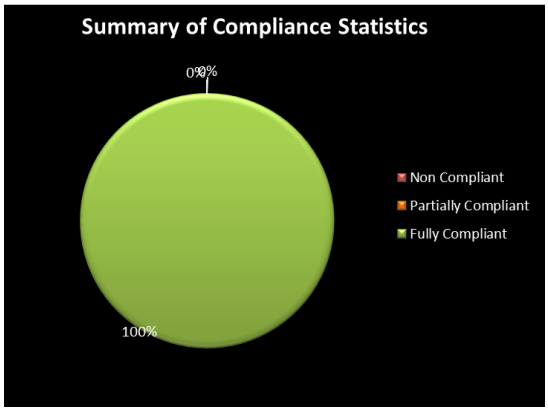


Figure 31: Summary of compliance with the requirements of the Impofu East EMPr (Nordex).

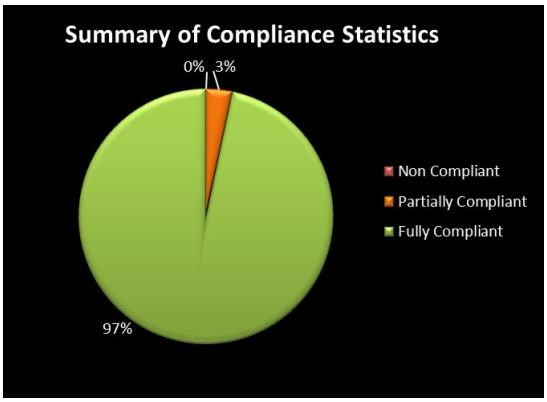


Figure 32: Summary of compliance with the requirements of the Buffer Yard EA (Nordex).

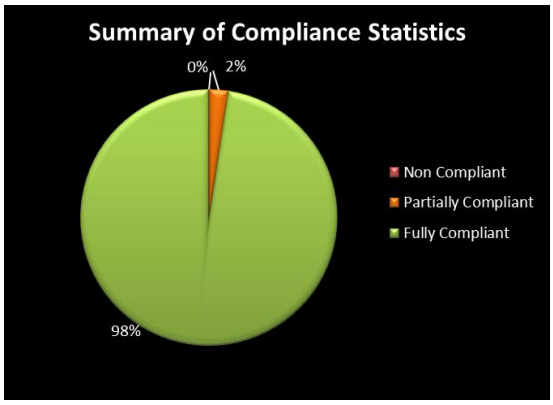


Figure 33: Summary of compliance with the requirements of the Buffer Yard EMPr (Nordex).

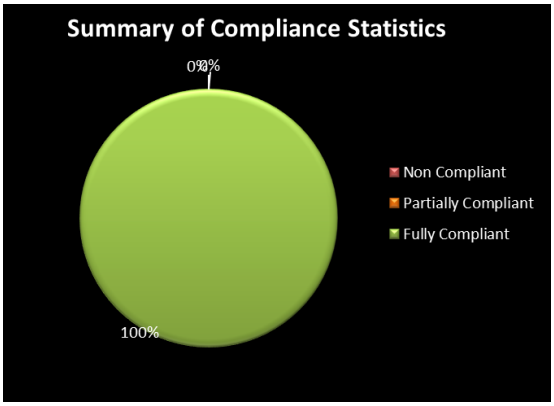


Figure 34: Summary of compliance with the requirements of the Substations EMPr (Brand Besamandla).

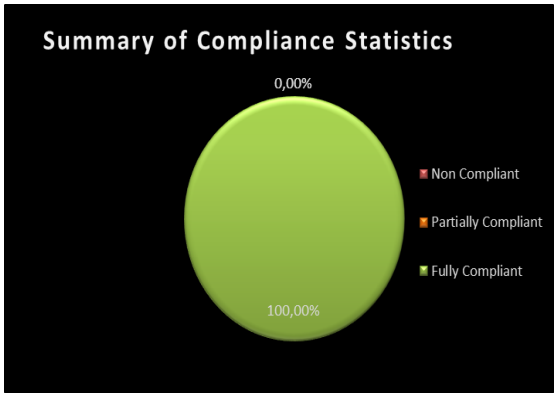
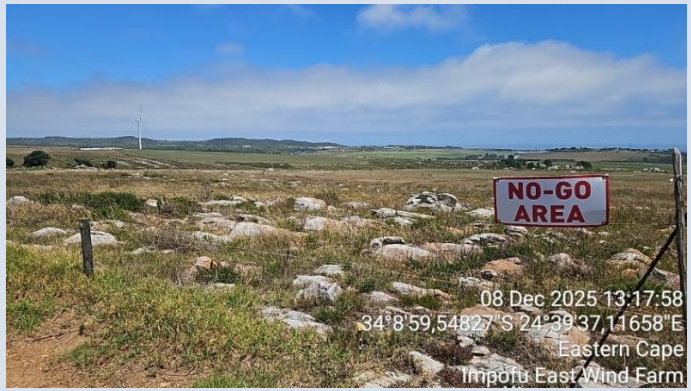


Figure 35: Summary of compliance with the requirements of the Water Use Authorisations (GA) (Power Construction).

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 36: Fence and signage at the archaeological site at Impofu East Wind Farm well maintained.
Buffer Yard	Wood Waste	Nordex	The wood waste stockpile at the buffer yard has been significantly reduced, with the majority of the material donated to the local community.	 Figure 37: Wooden pallets left at the buffer yard for re-use.

5.3 AREAS OF CONCERN

Three (3) new concerns were raised by the ECO during the current reporting period. One of the shipping containers at the warehouse area for Nordex was observed with a hole in the floor. The one next to it had used oil which was stored in an uncovered, and unlabelled container. The EO arranged for immediate relocation the oil to the HCS storage facility in the interim. It is recommended that storage of hazardous chemicals is closely monitored.

Signs of severe soil erosion were noted around WTG E10 and E12 during site inspection. Additionally, silt/debris runoff from WTG E12 was observed creeping onto the surrounding vegetated fields.

At the buffer yard, the bund wall of the hazardous waste area was observed to be disintegrated and the sand falling away. Given the temporary nature of the structure during its construction, it is recommended that the Contractor implements an alternative that can withstand harsh conditions.

Concerns raised in the previous period were addressed with urgency and are being monitored. 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: Used oil in unlabelled containers at Nordex warehouse.



Figure 39: Hole in the floor of storage container by Nordex.



Figure 40: Intense erosion at WTG E12.



Figure 41: Damaged bund wall at the buffer yard.

5.4 NON-COMPLIANCES

Four (4) 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
114	EMPr 5.3.4.2 **For Brand Besamandla** **EMPr 5.33** **For Brand Besamandla**	Should portable/chemical toilets be used then these shall be used and maintained in such a way that they do not cause water or other pollution: • Toilets shall be adequately secured to the ground to prevent them from toppling due to wind or any other cause. • Adequate toilet paper, and hand sanitiser or soap shall be provided. Structures vulnerable to high winds must be secured; Toilets must have been emptied and secured;	During site inspection before the temporary closure of the site, a mobile toilet at Impofu North Substation was not anchored. The toilet was meant to be removed by the service provider, Bidvest by the 12th of December 2025. On 16 January 2026, the Environmental Manager indicated that the appointed security company will take over the use of the toilet. However, the toilet was still not anchored.	Mobile toilets shall be inspected frequently and adequately secured to the ground at all times.	**Open/ Uncorrected**	 Figure 42: Toilet unsecured at Impofu North Substation.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
115	EA 98 **The Proponent**	The holder is authorised to apply a non-commercial mural to Turbine N4, limited to a maximum height of 11 meters above the base of the turbine. The mural must not affect turbine visibility or interfere with applicable aviation safety requirements, and no lighting or additional visual elements are permitted without prior approval from the Competent Authority.	During the current reporting period, it was observed that one of the three turbines approved by the Competent Authority for mural paintings exceeded the approved height above the turbine base. Specifically, the mural on WTG N4 extended to a height of up to 12 m.	New subcontractors shall be made aware of the requirements of the EA and EMPr, and their works monitored. It is further advisable to obtain comment/confirmation from the visual specialist on where the additional 1 metre above the maximum height will have a significant visual impact or not.	**Closed Out/ Corrected** Feedback from the visual specialist indicated: "Given that only three turbines are involved and they are relatively remote, and not in the public eye, it is unlikely that the overall visual significance as originally assessed for the Impofu WEF would increase. However, it is important that inappropriate precedence for the painting of wind turbines are avoided if possible."	 Figure 43: Mural paintings on Turbines N4.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
116	EA 108 **For Power Construction** EMPr 5.3.9.15 **For Power Construction**	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 the entrance of RW5, as well as a broken drip tray next to the spillages.	The contractor should ensure that spillages are cleaned properly, and contaminated soil and material be stored appropriately for safe disposal. It is recommended that spillages on site are prevented as much as possible. The over reliance on Oil Cap after spillages should be avoided.	**Closed-Out/Corrected** The Contractor environmental representative submitted images of the application of Oil Cap as a correction action at the end of the day.	 Figure 44: Diesel spillages noted on RW5.
117	EMPr 5.3.16.3 **For Power Construction**	Stormwater that has been loaded with suspended solids and silt during the construction phase can be released into watercourses provided all suspended solids have been removed from the water before it is discharged into the environment. • Sediment traps, sediment filters and settling out the solids in settlement ponds are possible solutions to preventing sediment from entering adjacent watercourses.	During audit inspection, the de-watering of turbine base at WTG N18 was observed. The responsible supervisor was instructed to immediately stop the activity and arrange for a silt trap. A similar non-conformance was noted days before the audit.	It is recommended that the Contractor puts all measures in place to release water into the environment slowly and without silt. It is recommended that the supervisor encourages all team members to be proactive with taking care of the equipment as they work around the construction site.	**Open/ Uncorrected**	

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
						 Figure 45: De-watering activity with no silt trap in place.

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) NCR's were issued during the current reporting period. The corrective action reports (CAR) for previous NCR's are awaiting final approval from the client.

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	**Closed Out/ Corrected** After approximately two months of monitoring the	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.	issue, there was no new evidence of landowner complaints has been submitted by the Contractor EO's. The Contractors' scope of work is focussed on commissioning	
106	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, empty hazardous chemical containers were observed outside the bund, and the hazardous waste skip	The Contractor shall conduct regular inspections and continuously coach the subcontractors on the importance of managing hazardous waste	**Work In Progress (WIP)** Proper storage and disposal of hazardous waste at the	



Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
	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.	was observed with general waste inside.	according to the relevant legislation.	buffer yard can still improve.	
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 to date with changing conditions, and maintaining emergency preparedness.	**Closed-Out/Corrected** Toolbox talks that were conducted between the 27th of November and 11th of December were submitted to the ECO for auditing.	N/A

5.8 INCIDENTS

Zero (0) incidents were reported during the current reporting period. 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. Complaints that are raised during the previous reporting period are 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 EQUATOR PRINCIPLES

Table 5: Summary of compliance with Equator Principles.

Guideline/Standard Requirement	Current Compliance (FC/PC/NC/NA)	Verification/Comments
Principle 1. Review and Categorization		
When a Project is proposed for financing, the EPFI will, as part of its internal environmental and social review and due diligence, categorise it based on the magnitude of its potential environmental and social risks and impacts. Such screening is based on the environmental and social categorisation process of the International Finance Corporation (IFC). Using categorisation, the EPFI's environmental and social due diligence is commensurate with the nature, scale, and stage of the Project, and with the level of environmental and social risks and impacts. The categories are: **Category A** – Projects with potential significant adverse environmental and social risks and/or impacts that are diverse, irreversible, or unprecedented. **Category B** – Projects with potential limited adverse environmental and social risks and/or impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures; and **Category C** – Projects with minimal or no adverse environmental and social risks and/or impacts.	**FC**	DNV South Africa (Pty) Ltd appointed to conduct assessment to Categorise the project. The project is a Category B Project because of the nature of it and DNV's understanding of the assessed potential environmental and social risks as well as impacts.
Principle 2. Social and Environmental Assessment		
For all Category A and Category B Projects, the client will be required to conduct an Assessment process to address the relevant environmental and social risks and impacts of the proposed Project. For Category A, and as appropriate, Category B Projects, the Assessment	**FC**	A detailed Environmental Impact Assessment (EIA) which included appropriate specialist studies proposed measures to minimise, mitigate, and where residual impacts remain, to compensate/ offset/ remedy any risks and impacts to workers, affected communities, and



Guideline/Standard Requirement	Current Compliance (FC/PC/NC/NA)	Verification/Comments
Documentation includes an Environmental and Social Impact Assessment (ESIA). The Assessment Documentation should propose measures to minimise, mitigate, and offset adverse impacts in a manner relevant and appropriate to the nature and scale of the proposed Project. One or more specialised studies may also need to be undertaken. For all Projects, in all locations, when combined Scope 1 and Scope 2 Emissions are expected to be more than 100,000 tonnes of CO^2 equivalent annually, an alternatives analysis will be conducted to evaluate less Greenhouse Gas (GHG) intensive alternatives.		the environment, in a manner relevant and appropriate to the nature as well as scale of the project. Environmental Management Programmes were developed which includes conditionings and mitigation measures to address the identified potential impacts. DNV is of the view that Carbon dioxide emissions generated during construction and operation is likely to be low and short-term duration due to the nature of the project.
Principle 3. Applicable Social and Environmental Standards		
The Assessment process should, in the first instance, address compliance with relevant host country laws, regulations and permits that pertain to environmental and social issues. The EPFI will require that the Assessment process evaluates compliance with the applicable standards as follows: 1. For Projects located in Non-Designated Countries, the Assessment process evaluates compliance with the then applicable **IFC Performance Standards** on Environmental and Social Sustainability (Performance Standards) and the **World Bank Group Environmental, Health and Safety Guidelines** (EHS Guidelines) (Exhibit III). 2. For Projects located in Designated Countries, the Assessment process evaluates compliance with relevant host country laws, regulations and permits that pertain to environmental and social issues. Host country laws meet the requirements of environmental and/or social assessments (Principle 2), management systems and plans (Principle 4), Stakeholder Engagement (Principle 5) and, grievance mechanisms (Principle 6). The Assessment process will establish to the EPFI's satisfaction the Project's overall compliance with, or justified deviation from, the	**FC**	A detailed EIA was undertaken in accordance with South African legislation and the necessary authorisations and permits were obtained. Furthermore, the IFC Performance Standards and applicable EHS Guidelines were taken into consideration from the start of the project. EIMS have been appointed to undertake legal compliance monitoring as well as compliance monitoring against the Lenders Requirements which includes the applicable Equator Principles, IFC Performance Standards and World Bank EHS Guidelines.



Guideline/Standard Requirement	Current Compliance (FC/PC/NC/NA)	Verification/Comments
applicable standards. The applicable standards (as described above) represent the minimum standards adopted by the EPFI. The EPFI may, at their sole discretion, apply additional requirements. Principle 4. Environmental and Social Management		
Principle 4. Environmental and Social Management System and Equator Principles Action Plan		
For all Category A and Category B Projects, the EPFI will require the client to develop or maintain an Environmental and Social Management System (ESMS). Further, an Environmental and Social Management Plan (ESMP) will be prepared by the client to address issues raised in the Assessment process and incorporate actions required to comply with the applicable standards. Where the applicable standards are not met to the EPFI's satisfaction, the client and the EPFI will agree an Equator Principles Action Plan (EPAP). The Equator Principles AP is intended to outline gaps and commitments to meet EPFI requirements in line with the applicable standards.	**FC**	DNV has prepared an Environmental and Social Action Plan (ESAP), instead of an Equator Principles Action Plan (EPAP), to also capture the gaps related to social requirement of the IFC and World Bank requirements. EMPrs for the project addressed the potential environmental risks and impacts associated with the construction, operation and decommissioning phases of the project. Furthermore, the EMPrs incorporates relevant mitigation measures from the EIAs, the conditions of the EA and other proposed mitigation measures and plans. The ESMS will be done for the project but only prior to construction completion. The client will appoint a consultant to compile the system in order for it to be used into the operation phase where this programme becomes operational.
Principle 5. Stakeholder Engagement		
For all Category A and Category B Projects, the EPFI will require the client to demonstrate effective Stakeholder Engagement as an ongoing process in a structured and culturally appropriate manner with Affected Communities and, where relevant, other Stakeholders. For Projects with potentially significant adverse impacts on Affected Communities, the client will conduct an Informed Consultation and Participation (ICP) process. Projects affecting indigenous peoples will be subject to a process of Informed Consultation and Participation and will need to comply with the rights and protections for indigenous	**FC**	The project has undertaken a full Public Participation Process (PPP) during the scoping and EIA phases of the project in accordance with legal requirements. It is also important to note that the PPP has been reviewed by the decision-making authorities during the authorisation process.



Guideline/Standard Requirement	Current Compliance (FC/PC/NC/NA)	Verification/Comments
peoples contained in relevant national law, including those laws implementing host country obligations under international law. Consistent with the special circumstances described in IFC Performance Standard 7 (when relevant as defined in Principle 3), Projects with adverse impacts on indigenous people will require their Free, Prior and Informed Consent (FPIC).		
Principle 6. Grievance Mechanism		
For all Category A and, as appropriate, Category B Projects, the EPFI will require the client, as part of the ESMS, to establish a grievance mechanism designed to receive and facilitate resolution of concerns and grievances about the Project's environmental and social performance. The grievance mechanism is required to be scaled to the risks and impacts of the Project and have Affected Communities as its primary user. It will seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate, readily accessible, at no cost, and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies. The client will inform the Affected Communities about the mechanism in the course of the Stakeholder Engagement process.	**PC**	The project has undergone comprehensive public consultation according to the applicable legislation during the EIA process. The approved EMPrs address incident reporting and the required complaints register. Although, formal grievance mechanism plan is reported available and in line with the requirements of a Grievance Mechanism, the draft grievance mechanism provided to the ECO was for internal reporting by the client. It is unclear whether this same mechanism applies to external stakeholders as well.
Principle 7. Independent Review		
For all Category A and, as appropriate, Category B Projects, an Independent Environmental and Social Consultant, not directly associated with the client, will carry out an Independent Review of the Assessment Documentation including the ESMPs, the ESMS, and the Stakeholder Engagement process documentation in order to assist the EPFI's due diligence, and assess Equator Principles compliance. The Independent Environmental and Social Consultant will also propose or opine on a suitable Equator Principles Action Plan capable of bringing	**FC**	DNV compiled a Technical Due Diligence Report as well as Environmental and Social Compliance Report which signifies an independent review of the project. EIMS has been appointed by the Client as the independent consultant to conduct compliance monitoring during construction of the project in terms of the applicable Equator Principles, IFC Performance Standards and World Bank EHS Guidelines.



Guideline/Standard Requirement	Current Compliance (FC/PC/NC/NA)	Verification/Comments
the Project into compliance with the Equator Principles or indicate when compliance is not possible. An Independent Review by an Independent Environmental and Social Consultant is required for Projects with potential high-risk impacts including, but not limited to, any of the following: • Adverse impacts on indigenous peoples; • Critical Habitat impacts; • Significant cultural heritage impacts; • Large-scale resettlement. In other Category A, and as appropriate Category B, Project-Related Corporate Loans, the EPFI may determine whether an Independent Review is appropriate or if internal review by the EPFI is sufficient. This may take into account the due diligence performed by a multilateral or bilateral financial institution or an OECD Export Credit Agency, if relevant. Principle 8.		
Principle 8. Covenants		
For all Projects, the client will covenant in the financing documentation to comply with all relevant host country environmental and social laws, regulations and permits in all material respects. Furthermore, for all Category A and Category B Projects, the client will covenant the financial documentation: a) to comply with the ESMPs and Equator Principles AP (where applicable) during the construction and operation of the Project in all material respects; and b) to provide periodic reports in a format agreed with the EPFI (with the frequency of these reports proportionate to the severity of impacts, or as required by law, but not less than annually), prepared by in-house staff or third-party experts, that i) document compliance with the ESMPs and Equator Principles AP (where applicable), and ii) provide	**FC**	In terms of this principle, the Client will be required to provide covenants in the financial documentation to ensure that the project: • complies with the regulatory framework; • provides periodic reports in a format agreed with EPFI's on the project performance; and • complies with requirements relating to the decommission of the facilities. The project specific Credit Facilities Agreement (CFA), which includes provisions with regards to EPs and IFCs, compliance with law as well as Environmental and Social is available. EIMS has been appointed by the Client as the independent consultant to conduct compliance monitoring in the project in terms of legal



Guideline/Standard Requirement	Current Compliance (FC/PC/NC/NA)	Verification/Comments
representation of compliance with relevant local, state and host country environmental and social laws, regulations and permits; and c) to decommission the facilities, where applicable and appropriate, in accordance with an agreed decommissioning plan. Where a client is not in compliance with its environmental and social covenants, the EPFI will work with the client on remedial actions to bring the Project back into compliance to the extent feasible. If the client fails to re-establish compliance within an agreed grace period, the EPFI reserves the right to exercise remedies, as considered appropriate.		requirements and the applicable Equator Principles, IFC Performance Standards and World Bank EHS Guidelines.
Principle 9. Independent Monitoring and Reporting		
To assess Project compliance with the Equator Principles and ensure ongoing monitoring and reporting after Financial Close and over the life of the loan, the EPFI will, for all Category A and, as appropriate, Category B Projects, require the appointment of an Independent Environmental and Social Consultant, or require that the client retain qualified and experienced external experts to verify its monitoring information which would be shared with the EPFI. For Projects where an Independent Review is required under Principle 7, the EPFI will require the appointment of an Independent Environmental and Social Consultant after Financial Close or require that the client retain qualified and experienced external experts to verify its monitoring information which would be shared with the EPFI.	**FC**	EIMS has been appointed by the Client as the independent consultant to conduct compliance monitoring during construction of the project in terms of legal requirements and the applicable Equator Principles, IFC Performance Standards and World Bank EHS Guidelines. The project will implement bird and bat post-construction fatality monitoring. The required 10 months pre-construction bird and bat monitoring has already been completed prior and during the EIA process. The Bat Specialist walkthrough report outlines some of the operational/post-construction monitoring requirements, however, the operation/post construction bat monitoring plan is still pending and will be available upon appointment of a specialist during construction phase (prior to operations commencing).
Principle 10. Reporting and Transparency		



Guideline/Standard Requirement	Current Compliance (FC/PC/NC/NA)	Verification/Comments
The following client reporting requirements are in addition to the disclosure requirements in Principle 5. For all Category A and, as appropriate, Category B Projects: • The client will ensure that, at a minimum, a summary of the ESIA is accessible and available online. • The client will publicly report GHG emission levels (combined Scope 1 and Scope 2 Emissions) during the operational phase for Projects emitting over 100,000 tonnes of CO^2 equivalent annually.	**NC**	1) The client will ensure that, at a minimum, a summary of the ESIA is accessible and available online. **No Project specific website is available yet, raised as Item 2 in the ESAP. The client has confirmed that the project specific website will be available after Financial Close. ECO is awaiting update in this regard.** 2) The client will publicly report GHG emission levels – not applicable, given the renewable nature of the Project. 3) The Project Sponsor is encouraged to share non-sensitive Project-specific biodiversity data, if generated, with the Global Biodiversity Information Facility (GBIF).

7 IFC PERFORMANCE STANDARDS

7.1 PERFORMANCE STANDARD 1

Assessment and Management of Environmental and Social Risks and Impacts: Requires the development of an Environmental and Social Management System to address the management and mitigation of risks and impacts identified, and corrective actions required. The Environmental and Social Management System (ESMS) entails a methodological approach to managing environmental and social risks and impacts in a structured way on an ongoing basis. The ESMS is in place and in conjunction with the other reviewed documents, including DNV Technical Due Diligence Report, various aspects pertaining to compliance with environmental legislation as well as mitigation measures required to provide a safe and healthy environment for all employees, partners, contractors and community members have been covered. The final EMPrs and generic EMPr of the projects incorporated relevant mitigation measures from the EIA, conditions of the EAs, and other proposed mitigation measures and plans.



Table 6: Findings for IFC Performance Standard 1.

Guideline/Standard Requirement	Current Compliance (FC/PC/NC/NA)	Verification/Comments
Performance Standard 1. Assessment and Management of Environmental and Social Risks and Impacts		
Environmental and Social Management System		
Environmental Policy	**FC**	Quality, Safety and Environmental Policy displayed at site offices.
Environmental and Social Management System	**FC**	The project ESMS is in place and in conjunction with the other reviewed documents, including DNV Technical Due Diligence Report, various aspects pertaining to compliance with environmental legislation as well as mitigation measures required to provide a safe and healthy environment for all employees, partners, contractors and community members have been covered. The final EMPrs and generic EMPr of the projects incorporated relevant mitigation measures from the EIA, conditions of the EAs, and other proposed mitigation measures and plans.
Organizational Capacity and Competency		
The project must have sufficient environmental human resources to manage the site effectively and implement environmental commitments.	**FC**	The client, Enel Green Power RSA (Pty) Ltd on behalf of Impofu Wind Farm appointed an independent Environmental Control Officer (Sisipho Mpotulo) to ensure environmental compliance is implemented and monitored. Power Construction (Civil contractor) has appointed Jurgens Wessels as the Environmental Manager and Mario dos Santos as the Environmental Officer to ensure the requirements of EA, EMPr, relevant legislation and landowner requirements are implemented. Brand Besamandla (Electrical contractor) has appointed Kgomotso Nakedi as the Environmental Officer to ensure the requirements of EA,

		EMPr, relevant legislation and landowner requirements are implemented.
An organizational structure that defines roles, responsibilities, and authority to implement the ESMS.	**FC**	A project organogram was available and displayed at the site satellite offices. The EMPr provide details of the organisational structures, roles and responsibilities, communication channels, and the framework for compliance auditing and reporting.
Designated specific personnel with clear lines of responsibility and authority.	**FC**	There is a project organogram which clearly defines the roles and responsibilities of all site personnel.
Environmental resources that are suitably qualified and experienced to manage the site effectively and implement environmental commitments.	**FC**	The client, Enel Green Power RSA (Pty) Ltd on behalf of Impofu Wind Farm (Pty) Ltd appointed an independent Environmental Control Officer (Sisipho Mpotulo) to ensure environmental compliance is implemented and monitored. Power Construction (Civil Contractor) has appointed qualified Environmental Manager (Jurgens Wessels) and Environmental Officer (Mario dos Santos) to ensure the requirements of the EA, EMPr, relevant legislation and landowner requirements are implemented. Brand Besamandla (electrical Contractor) has appointed qualified Environmental Officer (Kgomotso Nakedi).
Environmental and Social Assessment		
Environmental and Social Assessment	**FC**	Social specialist assessment undertaken during the EIA process (Appendix E6). Social risks were identified in the EMPr Objective 5.2.1.41.

Ongoing identification of environmental and social risks and impacts throughout the lifecycle of the project.	**FC**	Social specialist assessment undertaken during the EIA process (Appendix E6). Social risks were identified in the EMPr Objective 5.2.1.41.
Management Programs		
Management programs that, in sum, describe mitigation and performance improvement measures and actions that address the identified environmental and social risks and impacts of the project.	**FC**	The approved EMPr has appendices such as the following Management Plans: Waste, Fire, Traffic, Stormwater, Erosion, Wetland Rehabilitation and Monitoring, Aquatic, Open Space, Revegetation and Habitat Rehabilitation, Avifauna and Bat Monitoring, Invasive Alien Plant Species, and Plant Rescue and Protection. All these management plans address different risks and impacts related to the project.
The management program should recognise the dynamic nature of the project, and is it responsive to changes in circumstances, unforeseen events, and the results of monitoring and review.		The approved EMPr comprises of mitigation measures for impacts related to the project as well as emergency preparedness.
Management programs must establish Environmental and Social Action Plans to address issues raised in the risks and impacts identification process. Action plans shall include; • **Define desired outcomes and actions as measurable events to the extent possible;** • **Performance indicators and targets or acceptance criteria;** • **Resources, roles, and responsibilities.**		There is an Environmental and Social Action Plan which identified all the environmental and social risks. It also identifies the personnel responsible for implementing the corrective actions. Furthermore, the contractors' Emergency Preparedness and Response Plans which forms part of the approved EMPr is considered sufficient and comprehensive.
Emergency Preparedness and Response		
Does the ESMS establish and maintain an emergency preparedness and response system so that the client, in collaboration with appropriate and relevant third parties, will be prepared to respond to accidental and emergency situations	**FC**	The contractors' Emergency Preparedness and Response Plans which forms part of the approved EMPr is considered sufficient and comprehensive.



associated with the project in a manner appropriate to prevent and mitigate any harm to people and/or the environment.		
Monitoring and Review		
The client shall establish procedures to monitor and measure the effectiveness of the management programs, as well as compliance with any related legal and/or contractual obligations and regulatory requirements.	**FC**	EIMS is the appointed service provider for this monitoring. As per Regulation 54A(3) of the EIA Regulations 2014 (as amended in 2017) where an environmental authorisation issued in terms of the Environmental Conservation Act (ECA) Regulations or the previous National Environmental Management Act (NEMA) Regulations is still in effect by 8 December 2014, the Environmental Management Programme (EMPr) associated with such environmental authorisation is subject to the requirements contained in Part 3 of Chapter 5 of the Regulations and the first environmental compliance monitoring report must be submitted to the Competent Authority (CA) by a date to be published by Notice in the Government Gazette.
For projects with significant impacts, the client will retain external experts to verify its monitoring information.	**N/A**	No information.
Stakeholder Engagement		
The project shall develop and implemented a Stakeholder Engagement Plan.	**FC**	Various stakeholder engagement documents are in place which include a Stakeholder Engagement Plan (SEP), SEP matric and a Social, Environmental and Economic Context Analysis (SEECA) and a stakeholder Analysis Report. EGP appointed Mr Zolisa Marawu as stakeholder relations manager. Vathiswa Ntshota is the appointed CLO for Power Construction who is responsible for community engagement, recruitment, and liaison with relevant stakeholders. Kinisha Naidoo is an appointed HR Officer for Brand Besamandla who is responsible for community engagement, recruitment, and liaison with relevant stakeholders.



The client shall undertake a process of consultation in a manner that provides I&APs and Affected Communities with opportunities to express their views on project risks, impacts and mitigation measures, and allows the client to consider and respond to them.	**FC**	This requirement was fulfilled by the public participation process pre-construction.
Stakeholder engagement on an ongoing basis	**FC**	EGP appointed Mr Zolisa Marawu as stakeholder relations manager. The SRM will be responsible for the overall implementation of the developed grievance mechanism procedure. This includes serving as custodian of the complaints process, monitoring the handling of complaints, and suggesting changes to policies or practices. Vathiswa Ntshota is the appointed CLO for Power Construction who is responsible for community engagement, recruitment, and liaison with relevant stakeholders Kinisha Naidoo is an appointed HR Officer for Brand Besamandla who responsible for community engagement, recruitment, and liaison with relevant stakeholders.
Disclosure of information to affected Communities.	**FC**	EGP appointed Mr Zolisa Marawu as stakeholder relations manager who communicates with appointed Project Liaison Committee (PLC) and CLO to disclose information to affected communities. Vathiswa Ntshota is the appointed CLO for Power Construction who is responsible for community engagement, recruitment, and liaison with relevant stakeholders. Kinisha Naidoo is an appointed HR Officer for Brand Besamandla who is responsible for community engagement, recruitment, and liaison with relevant stakeholders.
External Communications and Grievance Mechanisms		

The client shall implement and maintain a grievance procedure for external communications.	**PC**	Grievance mechanism plan for external stakeholders has not been submitted to the ECO. The client has submitted the attendance registers from the PSC meeting last held in April 2025.
In addition to the above, clients are encouraged to make publicly available periodic reports on their environmental and social sustainability.	**NC**	Client has to provide proof compliance with this requirement.
Does the client provide periodic reports (at least annually) to the Affected Communities that describe progress with implementation of the project Action Plans?	**NC**	Refer to comment above.

7.2 PERFORMANCE STANDARD 2

Requires the implementation of human resources policies and procedures relevant to the size and workforce of the client and is consistent with the requirements of the Performance Standards. The pursuit of economic growth through employment creation and income generation should be accompanied by protection of the fundamental rights of workers. Details in terms of project compliance with relation to this performance standard is provided below.

Table 7: Findings for IFC Performance Standard 2.

Guideline/Standard Requirement	Current Compliance (FC/PC/NC/NA)	Verification/Comments
Performance Standard 2. Labour and Working Conditions		
Human Resources Policies and Procedures		
The client shall adopt and implement human resources policies and procedures appropriate to its size and workforce that set out its approach to managing workers consistent with the requirements of this Performance Standard and national law.	**FC**	Policies and procedures are in line with the Labour Relations Act of 1995.
The client will provide workers with documented information that is clear and understandable, regarding their rights under national labour and employment law and any applicable collective agreements, including their rights related to hours of work, wages, overtime, compensation, and benefits upon beginning the working relationship and when any material changes occur.	**PC**	This was done when workers signed their contracts. There is also an HR practitioner who oversees that this is done accordingly. (*Client to confirm if this is accurate*)
Working Conditions and Terms of Employment		
The client shall provide reasonable terms of employment (in accordance with National Law).	**FC**	The terms of employment are in accordance with the Labour Relations Act of 1995.
The client shall provide safe and healthy working conditions (in accordance with National Law).	**FC**	The working conditions are in line with the OHS Act of 1993. There are Safety Managers who ensure compliance to this requirement.



		There is also a Health & Safety plan that gives guidance on how this must be achieved.
Where accommodation services are provided to workers covered by the scope of this Performance Standard, the client will put in place and implement policies on the quality and management of the accommodation and provision of basic services.	**FC**	The Contractor provides accommodation for its employees where required and necessary.
Workers' Organizations		
Right to join workers' organizations	**FC**	Recruitment is in line with the Labour Relation Act of 1995.There is HR personnel to ensure that this is done accordingly.
Non-Discrimination	**FC**	
Engagement with workers' organizations	**FC**	
Non-Discrimination and Equal Opportunity		
The client will base the employment relationship on the principle of equal opportunity and fair treatment and will not discriminate with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, and disciplinary practices.	**FC**	Recruitment is in line with the Labour Relation Act of 1995.There is HR personnel to ensure that this is done accordingly.
Retrenchment		
Prior to implementing any collective dismissals, the client will carry out an analysis of alternatives to retrenchment.	**FC**	EGP Retrenchment Process will be initiated only for EGP Employees in line with Section 189A of the Labour Relation Act of 1995.
If the analysis does not identify viable alternatives to retrenchment, a retrenchment plan will be developed and implemented to reduce the adverse impacts of retrenchment on workers.	**FC**	EGP Retrenchment Process will be initiated only for EGP Employees in line with Section 189A of the Labour Relation Act of 1995.



The client should ensure that all workers receive notice of dismissal and severance payments mandated by law and collective agreements in a timely manner.		
All outstanding back pay and social security benefits and pension contributions and benefits will be paid **(i) on or before termination of the working relationship to the workers,** **(ii)where appropriate, for the benefit of the workers, or** **(iii) payment will be made in accordance with a timeline agreed through a collective agreement.**	**FC**	
Grievance Mechanism		
Has the client provided a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns?	**FC**	A formal grievance mechanism plan is available and in line with the requirements of a Grievance Mechanism. An internal grievance policy is also in place.
Child Labour		
The client will not employ children in any manner that is economically exploitative or is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral, or social development.	**PC**	EGP is in line with Chapter Six Prohibition of Employment of Children And Forced Labour Basic Conditions of Employment Act as amended by Basic Conditions of Employment Amendment Act, No 11 of 2002. Documents that make provision to manage and prohibit the use of Forced Labour/Child Labour and Slavery within the supply chain needs to be prepared and implemented. It is recommended that the Sponsor/Contractor obtain a written declaration stating that SMA Contractor is in compliance with required labour and slavery policies and that SMA Contractor has no knowledge of the occurrence of any Forced Labour by the SMA Contractor or any of its main Subcontractors and main suppliers. It is the opinion of DNV that the appointed contractors are expected to identify risks of Child/Forced Labour, remedy, and monitor the



		primary supply chain on an ongoing basis. Confirmation from suppliers should be sought by the relevant contractors and copies thereof kept on file for record-keeping and monitoring purposes and management procedures should be in place to address corrective or legal action if a supplier is found not complying. The Sponsor should provide confirmation that these aspects will be in place prior to the commencement of construction. (*The client should provide confirmation that this was done*)
Forced Labour		
The client will not employ forced labour, which consists of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty. This covers any kind of involuntary or compulsory labour, such as indentured labour, bonded labour, or similar labour-contracting arrangements. The client will not employ trafficked persons.	**FC**	The employment of workers and service providers in done in accordance with the Basic Conditions of Employment Act.
Occupational Health and Safety		
The client will provide a safe and healthy work environment, taking into account inherent risks in its particular sector and specific classes of hazards in the client's work areas, including physical, chemical, biological, and radiological hazards, and specific threats to women.	**FC**	The project specific OHS Plans address safety and environmental risks. Power Construction has also provided a Method Statement (MS) that addresses OHS. The contractor compiled an emergency preparedness MS and a separate Site Security and Staff Management MS. The project specific OHS and HSE plans provided, cover relevant OHS/HSE requirements as outlined in the Occupational Health and Safety Act no. 85 of 1993 and the applicable Construction Regulations of 2014. The project specific OHS Plan and Health, Safety and Environmental Plan provided by the contractor is considered sufficient. The client ensures compliance in line with Section 8 of the OHS Act, also In line with Constructions Regulations 2014, under Section 9. The appointments of Competent Risk Assessor are made. Then the development of Risk Assessments and Hazards identification is done.
The client will take steps to prevent accidents, injury, and disease arising from, associated with, or occurring in the course of work by minimizing, as far as reasonably practicable, the causes of hazards.		
In a manner consistent with good international industry practice, as reflected in various internationally recognized sources including the World Bank Group Environmental, Health		



and Safety Guidelines, the client will address areas that include the (i) **identification of potential hazards to workers, particularly those that may be life-threatening.** (ii) **provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances;** (iii) **training of workers.** (iv) **documentation and reporting of occupational accidents, diseases, and incidents; and** (v) **emergency prevention, preparedness, and response arrangements.**		
Workers Engaged by Third Parties		
With respect to contracted workers the client will take commercially reasonable efforts to ascertain that the third parties who engage these workers are reputable and legitimate enterprises and have an appropriate ESMS that will allow them to operate in a manner consistent with the requirements of this Performance Standard, except for paragraphs 18–19, and 27–29.	**PC**	EGP Technical Evaluation is conducted. HSE File are being monitored for compliance and the requirements of the OHS Act and its Regulations is performed to ensure that this requirement is fully met. The client should provide specification used for the project.
The client will establish policies and procedures for managing and monitoring the performance of such third-party employers in relation to the requirements of this Performance Standard. In addition, the client will use commercially reasonable efforts to incorporate these requirements in contractual agreements with such third-party employers.		
The client will ensure that contracted workers, covered in paragraphs 24–25 of this Performance Standard, have access to a grievance mechanism. In cases where the third party is not able to provide a grievance mechanism the client will extend its own		

grievance mechanism to serve workers engaged by the third party.		

7.3 PERFORMANCE STANDARD 3

Applicable Environmental and Social Standards: including alignment with the IFC Performance standards and applicable industry specific EHS Guidelines and compliance with relevant host country laws, regulations and permits that pertain to social and environmental matters. Details in terms of project compliance with relation to this performance standard is provided below.

Table 8: Findings for IFC Performance Standard 3.

Guideline/Standard Requirement	Current Compliance (FC/PC/NC/NA)	Verification/Comments
Performance Standard 3. Resource Efficiency and Pollution Prevention		
Resource Efficiency		
The client will apply technically and financially feasible resource efficiency and pollution prevention principles and techniques.	**FC**	The client promotes the recycling and reusing of resources where practical and possible. There are also mitigation measures in the approved EMPrs which aim to prevent the pollution of soil, water bodies and air.
The client will implement technically and financially feasible and cost-effective measures for improving efficiency in its consumption of energy, water, as well as other resources and material inputs.		
Green House Gases (GHG)		
The project shall consider alternatives and implement technically and financially feasible and cost-effective options to reduce project related GHG emissions.	**N/A**	This requirement not applicable to this project. The project will produce clean energy that will not produce GHGs.
Projects which produce (or expected to produce) more than 25,000 tonnes of CO_2-equivalent annually the project shall quantify GHG emissions	**N/A**	This requirement not applicable to this project. The project will produce clean energy that will not produce GHGs.

annually in accordance with internationally recognized methodologies and good practice.		
Water Consumption		
The client shall adopt measures that avoid or reduce water usage so that the project's water consumption does not have significant adverse impacts on others.	**FC**	The approved GAs for two boreholes on each WEF on Impofu East, Impofu West and Impofu North respectively, have limits which determine the volumes of water that can be abstracted. The ECO will monitor the usage of the water to ensure compliance with the stipulated limits. All three individual WEF also have permission with regards to Section 21 (c) Impeding or diverting the flow of water in a watercourse, (g) Disposing of waste in a manner which may detrimentally impact on a water resource and (i) Altering the bed, banks, course or characteristics of a watercourse. Also, water Management Plans are available for each WEF.
Measurement and reporting of water usage and implementation measures to improve water use efficiency.	**FC**	The approved GAs for two boreholes on each WF on Impofu East, Impofu West and Impofu North respectively, have limits which determine the volumes of water that can be abstracted. The ECO will monitor the usage of the water to ensure compliance with the stipulated limits. All three individual WEF also have permission with regards to Section 21 (c) Impeding or diverting the flow of water in a watercourse, (g) Disposing of waste in a manner which may detrimentally impact on a water resource ad (i) Altering the bed, banks, course or characteristics of a watercourse. Also, water Management Plans are available for each WEF.
Pollution Prevention		
Does the client avoid the release of pollutants or, when avoidance is not feasible, minimize and/or	**FC**	The approved EMPr refers to the Duty of Care provision in S28(1) of NEMA which states that the project proponent must ensure that reasonable

control the intensity and mass flow of their release?		measures are taken throughout the life cycle of this project to ensure that any pollution or degradation of the environment associated with this project is avoided, stopped, or minimized.
Where historical pollution such as land or ground water contamination exists, has the client sought to determine whether it is responsible for mitigation measures?	**N/A**	Not applicable.
If it is determined that the client is legally responsible, then have these liabilities been resolved in accordance with national law, or where this is silent, with GIIP (*Good International Industry Practice)?*	**N/A**	Not applicable.
To address potential adverse project impacts on existing ambient conditions, has the client considered relevant factors, including, for example. • **existing ambient conditions.** • **the finite assimilative capacity of the environment; (The capacity of the environment for absorbing an incremental load of pollutants while remaining below a threshold of unacceptable risk to human health and the environment).** • **existing and future land use.** • **the project's proximity to areas of importance to biodiversity; and** • **the potential for cumulative impacts with uncertain and/or irreversible consequences.**	**N/A**	Not applicable.



If the project has the potential to constitute a significant source of emissions in an already degraded area, the client shall consider additional strategies and adopt measures that avoid or reduce negative effects. (These strategies include, but are not limited to, evaluation of project location alternatives and emissions offsets).	**N/A**	Not applicable.
Wastes		
Has the client adopted principles and developed strategies to primarily avoid the generation of hazardous and non-hazardous waste materials?	**FC**	The approved EMPr is the adopted guidance of how all waste will be managed on the project. The Contractor also has a site-specific waste management plan.
Where waste generation cannot be avoided, the client shall reduce the generation of waste, and recover and reuse waste in a manner that is safe for human health and the environment.	**FC**	The approved EMPr is the adopted guidance of how all waste will be managed on the project. The Contractor also has a site-specific waste management plan.
Where waste cannot be recovered or reused; the client shall treat, destroy, or dispose of it in an environmentally sound manner that includes the appropriate control of emissions and residues resulting from the handling and processing of the waste material.	**FC**	The approved EMPr is the adopted guidance of how all waste will be managed on the project. The Contractor also has a site-specific waste management plan.
When hazardous waste disposal is conducted by third parties, the client shall use contractors that are reputable and legitimate enterprises licensed by the relevant government regulatory agencies and obtained chain of custody documentation to verify the final destination.	**FC**	The Contractor has appointed XP Projects as the hazardous waste disposal service provider.
The client shall ascertain whether licensed disposal sites are being operated to acceptable standards.	**FC**	The Contractor has identified a general and sewage waste facilities that are permitted and licenced for



Where this is not the case, the client shall reduce waste sent to such sites and consider alternative disposal options, including the possibility of developing their own recovery or disposal facilities at the project site.		disposal. General waste is disposed of Humansdorp Landfill site (permit number: 12/9/11/P53) in Kouga Local Municipality. Sewage waste is disposed of at the licenced Fishwater Flats Wastewater Treatment Works (Licence number: 12/9/11/L433/1) at Nelson Mandela Bay Municipality and Jeffreys Bay Wastewater Treatment Works under Kouga Local Municipality (Licence number: 12/K90F/EF/4333).
Hazardous Materials Management		
The client shall avoid or when avoidance is not possible, minimize and control the release of hazardous materials. (In this context, the production, transportation, handling, storage, and use of hazardous materials for project activities should be assessed).	**FC**	The Contractor has trained staff members on the transportation, handling, storage, and proper use of hazardous materials as per the Hazardous Substances Act (Act No 15 of 1973) and condition 5.3.9 of the approved EMPr.
The client shall consider less hazardous substitutes where hazardous materials are intended to be used in manufacturing processes or other operations.	**FC**	Hazardous Substances Act (Act No 15 of 1973) regulates the control of substances that may cause injury, or ill health, or death by reason of their toxic, corrosive, irritant, strongly sensitising or inflammable nature or the generation of pressure thereby in certain instances and for the control of certain electronic products. The contractor obtained a flammable liquid storage permit for diesel from Kouga Local Municipality fire and emergency services department. It is the Contractor's responsibility to determine if more permits in this regard would be required and if so, apply for the relevant permit.
The client shall avoid the manufacture, trade, and use of chemicals and hazardous materials subject to international bans or phase-outs due to their high toxicity to living organisms, environmental	**FC**	Hazardous Substances Act (Act No 15 of 1973) regulates the control of substances that may cause injury, or ill health, or death by reason of their toxic, corrosive, irritant, strongly sensitising or inflammable nature or the generation of pressure

persistence, potential for bioaccumulation, or potential for depletion of the ozone layer.		thereby in certain instances and for the control of certain electronic products. If applicable, a license is required to be obtained from the Department of Health.
Pesticide Use and Management		
Where appropriate, the client shall formulate and implement an integrated pest management (IPM) and/or integrated vector management (IVM) plan. **(The client's IPM and IVM program will integrate coordinated use of pest and environmental information along with available pest control methods, including cultural practices, biological, genetic, and, as a last resort, chemical means to prevent economically significant pest damage and/or disease transmission to humans and animals).**	**N/A**	Not applicable.

7.4 PERFORMANCE STANDARD 4

Environmental and Social Management System and Equator Principles Action Plan: Typically requires development of a Social and Environmental Management System that addresses the management of the impacts, risks, and corrective actions required. An action plan must be developed to address gaps identified in the independent review. Details in terms of project compliance with relation to this performance standard is provided below **Table 9.**

Table 9: Findings for IFC Performance Standard 4.

Guideline/Standard Requirement	Current Compliance (FC/PC/NC/NA)	Verification/Comments
Performance Standard 4. Community Health, Safety and Security		
Community Health and Safety		
The client shall evaluate the risks and impacts to the health and safety of the Affected Communities during the project lifecycle and established preventive and control measures consistent with good international industry practice (GIIP), such as in the World Bank Group Environmental, Health and Safety Guidelines (EHS Guidelines) or other internationally recognized sources.	**FC**	There is an approved health and safety plan which includes a safety, health and environmental risks which might affect the communities surrounding the construction footprint.
Infrastructure and Equipment Design and Safety		
The client shall design, construct, operate, and decommission the structural elements or components of the project in accordance with GIIP, taking into consideration safety risks to third parties or Affected Communities.	**N/A**	Not yet applicable.
Hazardous Materials Management and Safety		

The client shall manage hazardous materials in accordance with Performance Standard 3, taking into account risks to people and communities.	**FC**	Hazardous Substances Act (Act No 15 of 1973) regulates the control of substances that may cause injury, or ill health, or death by reason of their toxic, corrosive, irritant, strongly sensitising or inflammable nature or the generation of pressure thereby in certain instances and for the control of certain electronic products. The contractor obtained a flammable liquid storage permit for diesel from Kouga Local Municipality fire and emergency services department. The contractor developed an Integrated Waste Management Plan which addresses HSE requirements for transportation, storage, and use of hazardous substances.
Ecosystem Services		
Where appropriate and feasible, the client shall identify those risks and potential impacts on priority ecosystem services that may be exacerbated by climate change. (e.g., The diminution or degradation of natural resources, such as adverse impacts on the quality, quantity, and availability of freshwater, may result in health-related risks and impacts). **Adverse impacts shall be avoided, and if these impacts are unavoidable, has the client implemented mitigation measures in accordance with Performance Standard 6.**	**FC**	Risks were identified in the EIA study and mitigation control measures were stipulated.
Community Exposure to Disease		
The client shall take adequate measures to avoid or minimize the potential for community exposure to	**FC**	In terms of the Duty of Care provision in S28(1) the project proponent must ensure that reasonable



waterborne, water based, water-related, and vector borne diseases, and communicable diseases that could result from project activities, taking into consideration differentiated exposure to and higher sensitivity of vulnerable groups. **The client shall take adequate measures to avoid or minimize transmission of communicable diseases that may be associated with the influx of temporary or permanent project labour.**		measures are taken throughout the life cycle of this project to ensure that any pollution or degradation of the environment associated with this project is avoided, stopped, or minimised. Risk assessments were done, and mitigation measures were recommended in the approved EMPr.
Security Personnel		
When the client retains direct or contracted workers to provide security to safeguard its personnel and property, the client shall assess risks posed by its security arrangements to those within and outside the project site.	**FC**	The project has appointed Smart Security to provide security services for the project.
In making such arrangements, the client shall apply the principles of proportionality and good international practice in relation to hiring, rules of conduct, training, equipping, and monitoring of such workers, and by applicable law.	**FC**	
The client shall make reasonable inquiries to ensure that those providing security are not implicated in past abuses.	**FC**	
The client shall train security personnel adequately in the use of force (and where applicable, firearms), and appropriate conduct toward workers and Affected Communities; and require them to act within the applicable law?	**FC**	

The client shall provide a grievance mechanism for Affected Communities to express concerns about the security arrangements and acts of security personnel.	**NC**	The client should send a site-specific grievance mechanism plan to the ECO.
The client shall consider and, where appropriate, investigated all allegations of unlawful or abusive acts of security personnel, taken action (or urge appropriate parties to take action) to prevent recurrence, and reported unlawful and abusive acts to public authorities.	**FC**	

7.5 PERFORMANCE STANDARD 8

Covenants: This typically refers to obligations on the person lending or applying for finance. This review will assist in determining the applicable covenants for this project. Details in terms of project compliance with relation to this performance standard is provided below.

Table 10: Findings for IFC Performance Standard 8.

Guideline/Standard Requirement	Current Compliance (FC/PC/NC/NA)	Verification/Comments
Performance Standard 8. Cultural Heritage		
Protection of Cultural Heritage in Project Design and Execution		
The client shall comply with national legislation pertaining to cultural heritage.	**FC**	The phase 1 archaeological impact assessment was conducted to assess the proposed Impofu wind farm, 333kV as well as 132kV powerlines and switchyard, substation, comprising ancillaries to establish the range and importance of the exposed and in situ archaeological heritage material remains, sites and features; to establish the potential impact of the development; and to make recommendations to minimize possible damage to the archaeological heritage. Mitigation measures were outlined on the EMPr objective 5.3.6.5 “Should a new discovery of human remains/grave be made, then; all works within the vicinity of the human remains/grave shall cease immediately, and the area shall be cordoned off until the necessary remedial steps have been implemented and authorisation has been obtained to resume activities”. Furthermore, the EA states that, “if concentrations of archaeological heritage material, fossils and human remains are uncovered during construction, all work must cease



		immediately and be reported to the South African Heritage Resources Agency (SAHRA) so that systematic and professional investigation/ excavation can be undertaken".
Has the client identified and protected cultural heritage by ensuring that internationally recognized practices for the protection, field-based study, and documentation of cultural heritage are implemented?	**FC**	There is a Stone Age quarry site at Impofu East identified by a qualified archaeologist, Dr Peter Nilssen. As the specialist recommended, the quarry is avoided by the layout of the project and as it is in close proximity to development, it is made a No-Go Area and is protected from damage during the construction phase of the project. The site is enclosed with a temporary fence for the construction phase of development as recommended by the specialist.
Have competent professionals assisted in the identification and protection of cultural heritage?	**FC**	The Heritage Impact Assessment was conducted by Dr Peter Nilssen (BA Honours and PhD: Archaeology), an archaeologist who has experience with the Cultural Resource Management in the Eastern Cape and sections of the Northern and Western Cape Provinces.
Has the project site selection and design been undertaken so as to avoid significant adverse impacts to cultural heritage?	**FC**	A heritage specialist study was undertaken in the EIA (Appendix E8) in which a survey was conducted to identify and avoid exposed and in situ archaeological heritage materials, remains, sites features, as well as to evaluate any potential impacts of the development and recommend mitigation measure to potential damage. All heritage resources were identified and avoided accordingly.
Chance Find Procedures		



Has the client developed a procedure for managing chance finds of cultural heritage?	**FC**	A chance find procedure was developed for the project.
Consultation		
The consultation process shall include relevant national/local regulatory agency.	**FC**	The South African Heritage Resource Agency was involved in the consultation process.
The client shall consult with the Affected Communities to identify cultural heritage of importance, and to incorporate into the client's decision-making process the views of the Affected Communities on such cultural heritage.	**FC**	This was addressed on the developed a heritage specialist study in the EIA (Appendix E8).
Community Access		
Where the project site contains cultural heritage or prevents access to previously accessible cultural heritage sites, the client shall allow continued access to the cultural site or will provide an alternative access route, subject to overriding health, safety, and security considerations.	**FC**	A heritage specialist study was undertaken in the EIA (Appendix E8) in which a survey was conducted to identify and avoid exposed and in situ archaeological heritage materials, remains, sites features, as well as to evaluate any potential impacts of the development and recommend mitigation measure to potential damage. All heritage resources were identified and avoided accordingly.
Removal of Replicable Cultural Heritage		
Where the client has encountered tangible cultural heritage that is replicable and not critical, the client shall apply mitigation measures that favour avoidance.	**FC**	A heritage specialist study was undertaken in the EIA (Appendix E8) in which a survey was conducted to identify and avoid exposed and in situ archaeological heritage materials, remains, sites features, as well as to evaluate any potential impacts of the development and recommend mitigation measure to potential damage. All heritage resources were identified and avoided accordingly.

Removal of Non-Replicable Cultural Heritage		
The client will not remove any nonreplicable cultural heritage, unless all of the following conditions are met: • **There are not technically or financially feasible alternatives to removal;** • **The overall benefits of the project conclusively outweigh the anticipated cultural heritage loss from removal; and** • **Any removal of cultural heritage is conducted using the best available technique.**	**FC**	A heritage specialist study was undertaken in the EIA (Appendix E8) in which a survey was conducted to identify and avoid exposed and in situ archaeological heritage materials, remains, sites features, as well as to evaluate any potential impacts of the development and recommend mitigation measure to potential damage. All heritage resources were identified and avoided accordingly.
Critical Cultural Heritage		
The client should not remove, significantly alter, or damage critical cultural heritage. In exceptional circumstances when impacts on critical cultural heritage are unavoidable, the client will use a process of Informed Consultation and Participation (ICP) of the Affected Communities as described in Performance Standard 1 and which uses a good faith negotiation process that results in a documented outcome. The client will retain external experts to assist in the assessment and protection of critical cultural heritage.	**FC**	A heritage specialist study was undertaken in the EIA (Appendix E8) in which a survey was conducted to identify and avoid exposed and in situ archaeological heritage materials, remains, sites features, as well as to evaluate any potential impacts of the development and recommend mitigation measure to potential damage. All heritage resources were identified and avoided accordingly.

8 WORLD BANK EHS GUIDELINES

In accordance with Principle 3 of the Equator Principles, the project will be required to comply with the applicable World Bank EHS guidelines since South Africa is categorised as a non-designated country. It is important to note that both the general EHS guidelines apply to this project as well as the industry specific guidelines for wind energy projects.

8.1 GENERAL EHS GUIDELINES

The World Bank General EHS guidelines pertain to energy conservation, wastewater and ambient water quality, water conservation, hazardous materials management, and waste management. It should be noted though that these guidelines are mostly relevant to the construction phase of the Impofu WFs although there are aspects relating to the design and operation of the facility where these standards apply. The General EHS guidelines include a specific section relating to the construction and decommissioning aspects of a project.

The project was found to be substantially compliant in terms of the World Bank General EHS Guidelines.

The details of the compliance monitoring in terms of the World Bank General EHS Guidelines for construction are presented in **Table 11** below.

Table 11: World Bank EHS General Guidelines for construction and decommissioning.

Guideline/Standard	Current Compliance (FC/PC/NC/NA)	Verification/Comments
Environment		
Noise and Vibration	**FC**	A Noise impact assessment was undertaken during the EIA. The EMPr includes mitigation measures to reduce noise nuisance. The project design took these noise considerations into account.
Soil Erosion		
Air Quality	**FC**	The EMPr includes mitigation measures for management of dust and dust suppression is undertaken on site. Dust monitoring has also been implemented by the project and monitoring reports are shared with the ECO.
Solid Waste	**FC**	The appointed contractors dispose their general waste at a registered disposal landfill facility, Humansdorp Landfill site (permit number: 12/9/11/P53) in Kouga Local Municipality. The EMPr objective 5.3.15.7 and 5.3.15.8 requires the project to warrants that "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. Builder's rubble shall be neatly stockpiled in designated stockpile areas and shall regularly be removed from site to an appropriately licensed waste disposal facility or reuse/recycling facility approved by the Contract manager or ECO".
Hazardous Materials	**FC**	The contractor (Power Construction) has appointed registered service providers for the disposal of hazardous waste. As per EMPr objective 5.3.15.9, "Should the generation of hazardous waste be anticipated during the site activities, then suitable collection and storage facilities shall be planned, and an area of the Contractor's camp designated for this purpose in accordance with the relevant legislation". Furthermore, objective 5.3.15.10 states that "Any hazardous waste or contaminated soil shall be disposed of (in accordance with legislation) at a licensed hazardous waste disposal facility, as approved by the Contract Manager and ECO. • Hazardous waste is to be contained and transported as required by the relevant legislation".
Wastewater Discharges	**FC**	Objective 5.3.15.12 of the approved EMPr states that, 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.
Contaminated Land	**N/A**	Risk of occurrences of contaminated land is estimated to be low, and any identified existing contaminated land will be recorded and managed accordingly.



Occupational Health and Safety		
Over-exertion	**FC**	The project health & safety plan has addressed these requirements as there are legal appointments for people who will be overseeing these hazards which have been identified. Machinery and vehicles will be inspected, scaffolding and ladders will be inspected, and the required PPE will be issued. Inductions, toolbox talks and SHE awareness training will also be conducted. The EMPr includes mitigation measures for management of dust.
Over-exertion	**FC**	
Slips and falls	**FC**	
Work at Heights	**FC**	
Struck by Objects	**FC**	
Moving Machinery	**FC**	
Dust	**FC**	
Confined Spaces and Excavations	**FC**	
Other Site Hazards	**FC**	
Community Health and Safety		
General Site Hazards	**FC**	General site hazards are communicated to site visitors during the visitors' induction and the surrounding community if deemed necessary as per requirement 3.6 of the approved EMPr.
Disease Prevention	**FC**	Objective 5.2.1.50 of the approved EMPr states that an HIV/AIDS/TB awareness programme for all construction workers shall be implemented at the outset of the construction phase.
Traffic Safety	**FC**	There is a Traffic Management Plan and a site-specific method statement on how the Contractor will manage traffic. Traffic signage has been installed by the Contractor on site and on the district road which is shared with the general public.

8.2 GUIDELINES FOR WIND ENERGY PROJECTS

The EHS Guidelines for wind energy include information relevant to environmental, health, and safety aspects of onshore and offshore wind energy facilities. It should be noted that the EHS guidelines for wind energy projects were updated (August 2015) and these latest guidelines have been used for this assessment.

The details of the compliance monitoring in terms of the World Bank EHS guidelines for Wind Energy projects are provided in **Table 12** below.

Table 12: World Bank EHS Guidelines for Wind Energy Projects.

Guideline/Standard	Current Compliance (FC/PC/NC/NA)	Verification/Comments
Visual Impacts		



Have visual impacts been assessed during the EIA? Have appropriate mitigation measures been developed for visual impacts including consideration of turbine layout, size, and scale in relation to the surrounding landscape surrounding visual receptors?	**FC**	Visual impacts are one of the most significant impacts associated with the wind farm. A visual impact assessment (VIA) was undertaken as part of the EIA (Appendix E10) for the project. The assessment identified mitigation measures and presented a management plan. The management plan is however primarily aimed at addressing secondary impacts as the primary visual impact of wind turbines has a very low or limited mitigation potential. The primary visual impact, namely the appearance and dimensions of the wind energy facility (mainly the wind turbines) is not possible to mitigate to any significant extent within this landscape.
Visual impacts on Legally Protected and Internationally Recognized Areas of importance to biodiversity and cultural heritage features been taken into consideration?	**FC**	There are no nearby or potentially affected Legally Protected and Internationally Recognized Areas. Some cultural heritage features have been identified on site however visual impacts are not considered to be significant for these types of heritage features.
Proximity of turbines to settlements, residential areas, and other visual receptors to minimize visual impacts and impacts on residential amenity, where possible. All relevant viewing angles should be considered when considering turbine locations, including viewpoints from nearby settlements.	**FC**	The siting of the development was informed by the various specialist studies in addition to the VIA. The decision to grant authorisation for the proposed development lies with the competent authority and is based on a review of the EIA in its entirety.
Visual impact of ancillary infrastructure.	**FC**	Ancillary services are kept to a minimum in the project design which assists in minimising the visual impact. Cables connecting turbines will be buried which reduces potential visual impact.
Adherence to country-specific standards for marking turbines, including aviation/navigational and environmental requirements.	**FC**	SACAA no objection letters included the proposed transmission line routing on condition that the restricted to 32m in height.
Consultation with potentially affected parties?	**FC**	A full PPP was undertaken during the EIA phase for the project.



Noise		
Is the site properly sited to avoid locations in close proximity to sensitive noise receptors (e.g., residences, hospitals, and schools)?	**FC**	Noise report was developed for the project during EIA process and attached as Appendix E9 which is a specialist study to determine potential noise impact on the surrounding areas. Typical potential noise impacts during operations and decommissioning are also addressed. There is low risk that the project will significantly impact the surrounding population.
Construction noise should be limited to protect people living nearby. Noise-producing activities include blasting, piling, construction of roads and turbine foundations, and the erection of the turbines themselves.	**FC**	There are several residents close to the site who will be affected by the noise. EMPr Objective 5.3.12.2, states that "All vehicle/ plant shall be maintained in good working order, shall adhere to the relevant lighting & noise requirements of the Road Traffic Act (93 of 1996) and SANS 1200A Clause 4.1, and vehicle service histories are to be kept up to date to reduce potential noise and air pollution from vehicle emissions:• All vehicles shall be equipped with an appropriate silencer on their exhaust systems. • Mechanical equipment with lower sound power levels shall be selected wherever possible. • Safety measures that generate noise, such as reverse gear alarms on large vehicles, shall be appropriately calibrated or adjusted to minimise noise". Objective 5.3.14.5, "All reasonable measures shall be implemented to reduce the noise impacts associated with drilling and blasting to neighbouring residents, land uses, services or infrastructure". All employees are provided with ear protection as part of PPE.
Operational noise. Consideration of mechanical and aerodynamic sources.	**FC**	A noise report was compiled for the project during EIA process and attached as Appendix E9 which is a specialist study to determine potential noise impact on the surrounding areas. The approved EMPr provides mitigation and control measures.

Have appropriate mitigation measures been applied in accordance with the EHS guideline?	**FC**	The mitigation measures are applied with the EHS guidelines. Ear protection is given to all workers and work hours are kept within the stipulated times.
Methodology for noise assessment as per EHS guidelines.	**FC**	The noise assessment was done according to the Noise Control Regulations and SANS 10103.
Impacts on Biodiversity		
Have impacts on birds and bats been assessed in the EIA?	**FC**	Biodiversity ecology as well as bat report compiled as part of EIA and attached as Appendix E1 and E3 was developed for the project as specialist studies. A specialist ecological assessment and an ecological walkthrough has been undertaken for the project. EIA avifauna (Appendix E4) was developed for the project as guide to determine potential impact to fauna.
Has siting taken into consideration the avoidance and minimization of potential adverse impacts on biodiversity? • Consideration of the proximity of the proposed wind energy facility to sites of high biodiversity value in the region.	**FC**	Biodiversity ecology report as EIA Appendix E1 was developed for the project which is a specialist study. A specialist ecological assessment and an ecological walkthrough has been undertaken for the project.
Pre-construction biodiversity assessments: • Site-specific baseline biodiversity information. • Site-specific issues: consideration of habitats, geographical location, topography, and vicinity of the wind energy facility to sites of high biodiversity value. • Species of high conservation value. • Seasonality considerations. • Long term assessments.	**FC**	Prior to clearing, a search and rescue of protected plants and animals was undertaken by qualified botanists (Dr Brian Colloty). Clearance certificates were issued to the project to commence with vegetation clearing activities. Biodiversity report as EIA Appendix E1 was developed for the project which is a specialist study. A specialist ecological assessment and an ecological walkthrough has been undertaken for the project.
Have turbine arrays been configured to avoid and minimize collision risks to birds and bats? • Technical experts/Specialist input. • Use of appropriate technology and data-gathering techniques.	**FC**	Prior to clearing a search and rescue of protected plants and animals was undertaken by qualified botanists (Dr Brian Colloty). Clearance certificates were issued to the project to commence with vegetation clearing activities.



• Species-specific considerations. • Monitoring programs. • Cumulative impacts.		Biodiversity report as EIA Appendix E1 was developed for the project which is a specialist study. A specialist ecological assessment and an ecological walkthrough has been undertaken for the project.
Have appropriate mitigation measures been applied in accordance with the EHS guideline?	**FC**	Prior to clearing a search and rescue of protected plants and animals was undertaken by qualified botanists (Dr Brian Colloty). Clearance certificates were issued to the project to commence with vegetation clearing activities. Biodiversity report as EIA Appendix E1 was developed for the project which is a specialist study. A specialist ecological assessment and an ecological walkthrough have been undertaken for the project.
Shadow Flicker		
Have impacts of shadow flicker on sensitive receptors been assessed? • Where nearby sensitive receptors may be affected was appropriate methodology used to predict impacts? (e.g., modelling software)	**FC**	A visual assessment (Appendix E10) was conducted as part of the EIA study and this was taken into consideration.
Have appropriate measures been taken to avoid or mitigate shadow flicker? • Site wind turbines appropriately to avoid shadow flicker being experienced or to meet limits placed on the duration of shadow flicker occurrence (shadow flicker effects experienced at a sensitive receptor does not exceed 30 hours per year and 30 minutes per day on the worst affected day, based on a worst-case scenario); • Wind turbines can be programmed to shut down at times when shadow flicker limits are exceeded.	**FC**	A visual assessment (Appendix E10) was conducted as part of the EIA study and this was taken into consideration.
Are blades and turbines painted with a matt, non-reflective finish to avoid impact of blade or tower glint on sensitive receptors?	**N/A**	Not yet applicable.
Water Quality		



Have adequate measures been implemented to prevent and control erosion and sedimentation?	**FC**	An ecology report study was conducted, and mitigation measures were recommended. In this current period, soil stockpiles have been placed away from drainage lines and on flat surfaces to prevent erosion.
Occupational Health and Safety		
Has a risk assessment been undertaken to identify site specific risks?	**FC**	This was undertaken in the health and safety plan. The Contractor also has risk assessments for all activities which will be undertaken.
Working at Height and Protection from Falling Objects: • Protection systems. • Structures designed to applicable standards; • Exclusion zones; • Training and competency; • Equipment checks • Lanyards; • Avoidance of windy conditions; • Emergency rescue plan.	**FC**	Working at heights training was undertaken on site, equipment will be inspected and there is an emergency rescue plan in place.
Working over water	**FC**	There is a risk assessment and method statement for working in watercourses.
Working in Remote Locations: • Communication equipment; • Supervision by competent personnel; • Local emergency plan; • Provision of suitably qualified first aid trained personnel.	**FC**	The Contractor has a two-way radio communication system that was established and implemented on site. The contractor has appointed an emergency ambulance for the project to assist with medical emergencies that may arise.
Lifting Operations: • Training and Competency; • Exclusion Zones; • Weather Conditions; • Equipment Inspections.	**FC**	Lifting equipment is inspected daily. The activities are undertaken by trained and competent personnel.
Community Health and Safety		
Ice Throw • ("setback") between wind turbines and adjacent sensitive receptors; • Ice Detectors and blade-heating systems; • Warning signs; • Working procedures for icing conditions.	**N/A**	Not yet applicable.
Blade Throw	**N/A**	Not yet applicable.



• ("setback") between wind turbines and adjacent sensitive receptors; • lightning protection systems; • Periodic blade inspections and repair any defects that could affect blade integrity; • Equip wind turbines with vibration sensors.		
Aircraft Safety • Consult with the relevant aviation authorities; • Siting considerations; • Pilot activated anti-collision lighting and marking systems.	**FC**	A consent letter was received from the Civil Aviation Authority.
Aviation Radar • Consultation with the relevant aviation authorities; • wind energy facility design options; • Radar design alterations.	**FC**	A consent letter was received from the Civil Aviation Authority.
Electromagnetic Interference • Electromagnetic interference with telecommunication systems (e.g., microwave, television, and radio).	**FC**	A clearance letter was received from Sentech.
Telecommunication Systems	**FC**	An approval letter was received from Telkom, MTN, Vodacom, and Cell C.
Television	**FC**	A clearance letter was received from Sentech.
Public Access	**FC**	Public access is limited, no unauthorised persons are allowed at the site. Only persons with induction cards are permitted to enter the project site.
Abnormal Load Transportation • Statutory Permissions; • Delays to other road users; • Infrastructure Damage; • Road Accidents.	**FC**	Site specific Traffic Management Plan as well as Health and Safety plan are in place.
PERFORMANCE INDICATORS MONITORING		
Environment		
Emissions and Effluent Guidelines	**N/A**	Not applicable.
Noise Monitoring Noise impacts should not exceed the levels presented in the General EHS Guidelines,	**FC**	A noise impact assessment was undertaken during the EIA. A noise monitoring report was done, the impact is expected to be minor

nor result in a maximum increase in background levels of 3 dBA at the nearest receptor location.		negative because the construction activities have a short time duration and will be limited to the turbine position.
Environmental Monitoring	**FC**	Environmental monitoring is conducted by site EOs and ECO.
Operation Phase Biodiversity Monitoring	**N/A**	Operational phase monitoring will be done once the site is operational.
Occupational Health and Safety		
Occupational Health and Safety Guidelines • Recording incidents and near misses; • Compliance monitoring; • Safety Meetings; • Benchmarking.	**FC**	There are safety practitioners from the client's and Contractor's side who monitor occupational health and safety on site. SHEQ4ALL is an application system used to report near misses, site observations and incidents on site.
Accident and Fatality Rates	**FC**	No accidents or fatalities were reported in the current reporting period.
Occupational Health and Safety Monitoring	**FC**	Full time qualified safety practitioners appointed by the client and the contractor to monitor occupational health and safety on site.

9 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 13: Summary of observations noted.

Description	Number Raised during Reporting Period	Total Number Raised	Total Number Open/ Uncorrected
Areas of Concern	**3**	**42**	**1**
Non-compliances	**4**	**116**	**4**
Non-compliance Reports	**0**	**3**	**1**
Incidents	**0**	**37**	**0**
Complaints	**0**	**17**	**1**

10 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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