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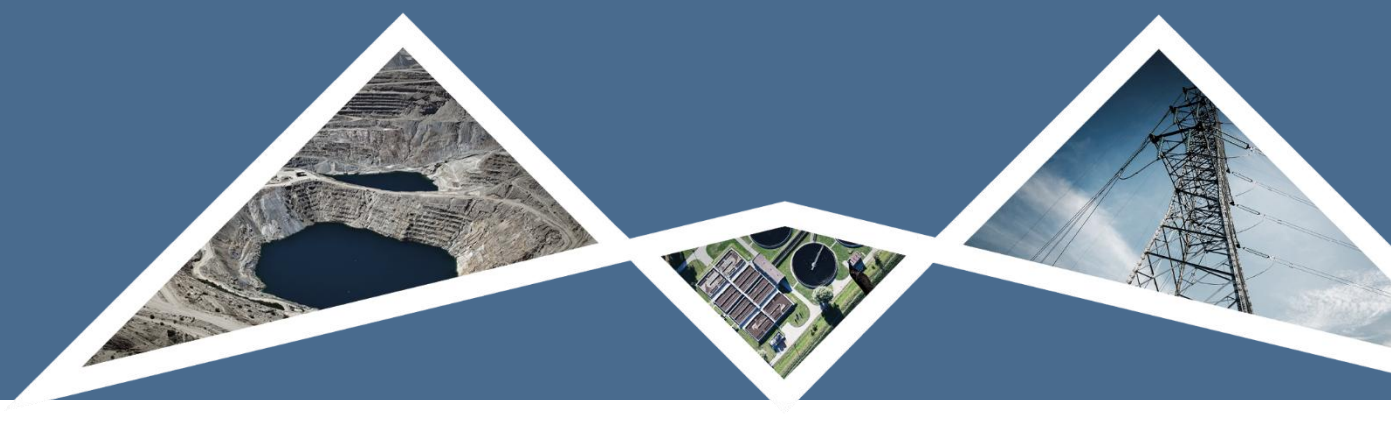
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MARCH 2026 MONTHLY ECO AUDIT REPORT

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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2026/05/04	REVISION 1	Final ECO Report

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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 (Red Cap) was granted Environmental Authorisations (EAs) by the then Department of Environmental Affairs (DEA) for construction of 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; and 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) on behalf of Red Cap 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 March 2026 for 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 198 MW Wind Farm comprised of up to 26 wind turbines. Following various assessments and new technologies becoming available, this was revised and is now ~112.1 MW through 19 turbines.

Impofu East

The Impofu East Wind Farm is located entirely within the Kouga Local Municipality, within the Sarah Baartman District Municipality. The Impofu East site is centred on 34°7'37.9"S and 24°36'28.7"E. It is approximately 18 kilometres (km) south-west of Humansdorp, and approximately 6 km north-west of the town of Oyster Bay from the centre point of the site (700 m away at its closest point). The Impofu East Wind Farm is situated to the south of the N2 National Road and R102 Main Road. Initially the Wind Farm was authorised to construct Impofu East Wind Farm, a 198 MW Wind Farm comprised of up to 33 wind turbines. As above, this was revised and is now 112.1 MW through 19 turbines.

Impofu West

The Impofu West Wind Farm is located entirely within the Kouga Local Municipality, within the Sarah Baartman District Municipality. The Impofu West site is centred on 34°5'28" South latitude and 24°32'53" East longitude and is approximately 14 kilometres (km) north-west of Oyster Bay as taken from the centre point. Initially the Wind Farm was authorised to construct Impofu West Wind Farm, a 174 MW Wind Farm comprised of up to 29 wind turbines. As above, this was revised and is now 112.1MW through 19 turbines. (Refer to Figure 1 for the Impofu Cluster boundaries).

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.

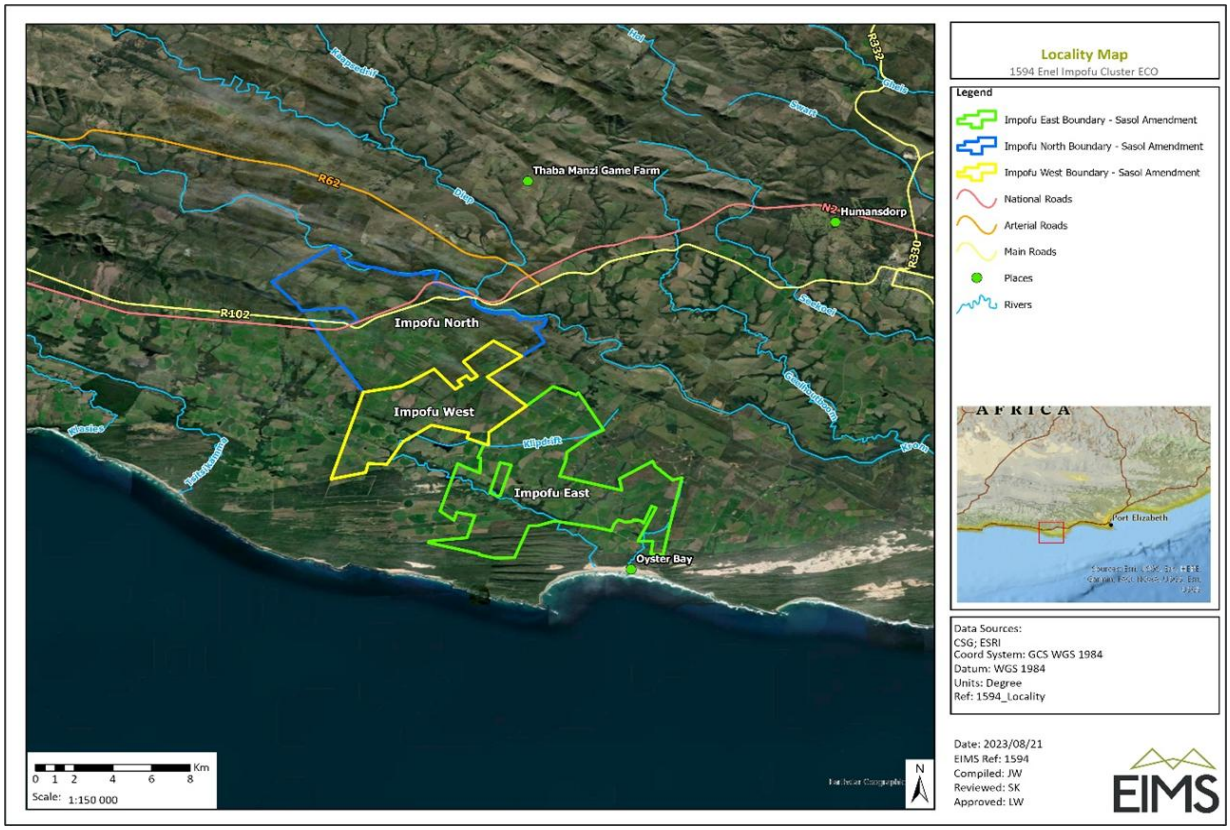


Figure 1: Impofu Cluster boundaries.

The 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 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 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. 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 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 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 Tembo for transport and logistics, and Downings Marquees for Marquee Hire.

Construction progress meetings are held daily where daily tasks, as well as environmental aspects and concerns, are discussed. Nordex's main activities focussed on testing, commissioning, and maintenance of the turbines. Power and Brand Besamandla were finalizing major construction works, signing off completed work areas with landowners, and correcting various issues and snags identified during client inspections.

Significant vegetation regrowth was noted at Impofu North, East and Powfontein substations. Other areas where topsoil was reinstated require close monitoring as either weeds have taken over or soil has become to poor for vegetation establishment. Landowners have indicated the recurrence of alien invasive species *Datura ferox,* which Power continues to mechanically pull them where possible. Finally, Power went back to remove the rocks they left behind at various turbine bases where topsoil had been reinstated.

A total of 79.5 mm of rainfall was recorded during the current reporting period, which has encouraged vegetation establishment and supported rehabilitation across the wind farm. Biosecurity against the Foot-and-Mouth Disease (FMD) is ongoing on site, and more long-term spray points were installed at Impofu North Wind

Farm. Phased demobilization of Power and Nordex's site camps, as well as the buffer yard, are ongoing. It is noteworthy that the contractors are removing a large number of human resources, which raises the concern of the longer turnaround time for rectifying non-compliances, as well as the quality of such rectification.

Commissioning and maintenance in the turbines at Impofu North Wind Farm is currently underway. The following construction activities, however, are underway:

- MV Reticulation.
- Topsoil reinstatement.
- Earthworks.
- Phased rehabilitation.

2 DETAILS OF THE ECO

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

2.1 EXPERTISE OF THE ECO

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

2.2 DECLARATION OF INDEPENDENCE

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

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

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

Signature: 

3 SCOPE, PURPOSE AND OBJECTIVE OF THE AUDIT

The scope of the audit is to assess compliance with the conditions of the Impofu Wind Farms (North, West and East) and their associated infrastructure EA/EMPr as well as related permits and licences near Oyster Bay in the Eastern Cape Province. The EMPr dated 17 May 2023 was approved was approved by DFFE on the 13th of June 2023 as part of the EA for Impofu Wind Farms. The purpose of the audit is to ensure compliance with the requirements of the EMPr which requires monthly compliance monitoring of the EMPr during the construction period. The objective of the audit is to determine and monitor the level of compliance of the License Holder with the provisions of the requisite EA and EMPr, related permits as well as licences. This report is prepared in accordance with Appendix 7 of the 2014 EIA Regulations (as amended). The objective of the environmental audit report is to:

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

4 AUDIT METHODOLOGY

4.1 PROCEDURE FOR THE AUDIT

Regular audits are conducted in accordance with the principles and processes outlined in SANS 19011: 2012 Edition 2: Guidelines for Auditing Management Systems. The audit focused on the following elements of the project with respect to the EA (DEA Ref: 14/12/16/3/3/2/1102, 14/12/16/3/3/2/1103 and 14/12/16/3/3/2/1104) as well as the updated and approved EMPr for the Impofu Wind Farms and associated infrastructure dated 17 May 2023; relevant environmental legislations, as well as environmental method statements. Audit was also conducted for the Water Use Authorisation (Ref Nos.: WU33991, WU32727, WU14968, WU15001, WU15014) 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.
- 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.
- Water Use Authorisation (GA) for Section 21 (c, i and g) was approved on the 28th of March 2022 for the Impofu East, West and North Wind Farms.
- 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 4th 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 4th 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 4th 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 include: reducing carbon dioxide emissions, and snake awareness and PPE by Power-Besamandla Consortium.

Nordex conducted three toolbox talks (TBT) for the current reporting period. Topics discussed include safe driving on and off site, safety in electrical systems, as well as a stand down on work area safety and lessons learnt from a lost time injury (LTI). Registers were available in the contractors site file, such as the updated incident register; a complaint register; updated water register; training registers; 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 Power and Brand Besamandla sites and disposed at the landfill site during the current reporting period. This may have been attributed to the clean-up and de-establishment of the wind far. 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 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 12 m^3 of general waste was removed from Nordex sites in March 2026. Awaiting the amount of steel removed from Nordex sites for recycling.

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). A total of 6 m^3 of hazardous waste was removed from Nordex sites during the current reporting period. In addition, 0.2 m^3 of liquid waste oil was removed for recycling. There was no hazardous waste disposed by Power

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. Moreover, Power Construction appointed 'Sewerage works (Pty) Ltd' to service the conservancy tanks at their site camp establishment. During this reporting period, Bidvest collected 2.98 m^3 of effluent for disposal from servicing toilets. 'Sewage works removed a total of 40 m^3 of effluent waste. Waste disposal certificates are available in the contractor's environmental file.

The conservancy tank at the Nordex site camp was serviced on one occasion between the 2nd and 31st March 2026. During this reporting period, approximately 10.3 m^3 of effluent was extracted from all Nordex sites.

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 has been generated for the past year of the wind farm construction, and none was disposed during this reporting period.

Water Consumption

Water extraction for Power, Besamandla, and Nordex has been reduced to only Steynberg's borehole (WU33991). The water from the boreholes is mainly used for to flush toilets at the site camps and for dust suppression. A total of 508 m^3 of water was abstracted between the 03rd and 23rd of March 2026. A total of 20 639 m^3 of water has been abstracted from this borehole from 11 January 2025 to date.

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 13th and 14th of April 2026. Activities for the current reporting period include the following:

Power Construction completed the following activities during the current reporting period:

- Maintenance on internal road.
- Landowner inspections and snags.
- Topsoil trimming on foundations.
- Rehabilitation of base platforms.
- Handover of crane pads and platforms.
- Phased demobilization of site camp containers.
- Fence reinstatement.

Brand Besamandla has completed works at the substations. Their main activities for the current reporting period were primarily punch items inside the substations and MV cable installations. The activities listed below, similar to the previous reporting period, are underway:

- **West Substation**:
  - Decommissioning site infrastructure.
  - Expanding subsoil drainage to ensure effectiveness.
  - Herbicide application.
  - Placing yard stone.
- **Powfontein Substation**:
  - Laydown decommissioned.
- **North Substation**:
  - Expansion of subsoil drain.
  - Herbicide application.
- **East Substation**:
  - Expansion of subsoil drain.
  - Herbicide application.
  - Laydown decommissioning.
- **MV Reticulation**

- Placing cable route markers.
- Modification of Impofu West Met Mast.

Nordex is mainly engaged in commissioning and maintenance activities inside the turbines.



Figure 2: Water ponding at WTG W16



Figure 3: Patches of bare soil at Powfontein substation laydown



Figure 4: Good housekeeping at Power's site camp



Figure 5: Concrete mixing on impermeable hardened surface



Figure 6: Bird nesting at North substation



Figure 7: Telehandler without a drip tray at Nordex site camp



Figure 8: Excavation of a channel towards a wetland

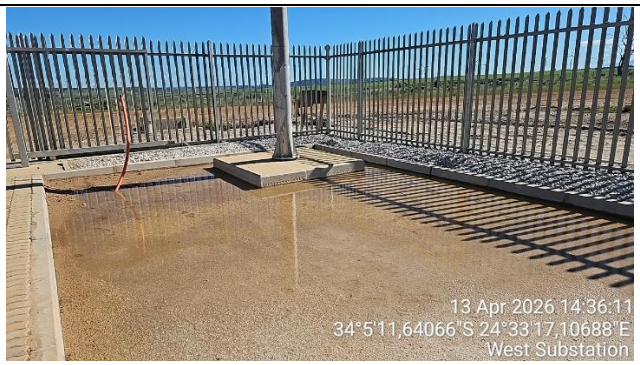


Figure 9: Water ponding at West substation



Figure 10: Expansion of subsoil drainage system at East substation



Figure 11: Vegetation regrowth in previously disturbed wetland



Figure 12: Leftover rocks at WTG W13 from construction works



Figure 13: Ponding in v-drain at WTG W14



Figure 14: Vegetation regrowth at WTG W15 where topsoil mixing occurred



Figure 15: Hessian weave at Powfontein substation damaged by cattle



Figure 16: Rill erosion noted at West substation



Figure 17: Empty sandbags await disposal at the buffer yard



Figure 18: Subsoil left at West substation for rehabilitation



Figure 19: Boulders and tree trunks at West substation

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 5.2 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.

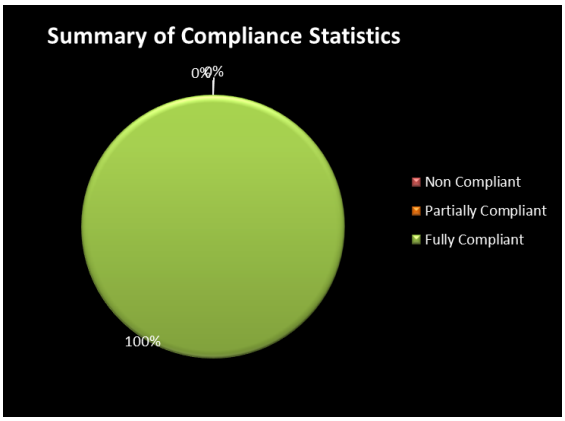


Figure 20: Summary of compliance with the requirements of the Impofu West EA (Power Construction).

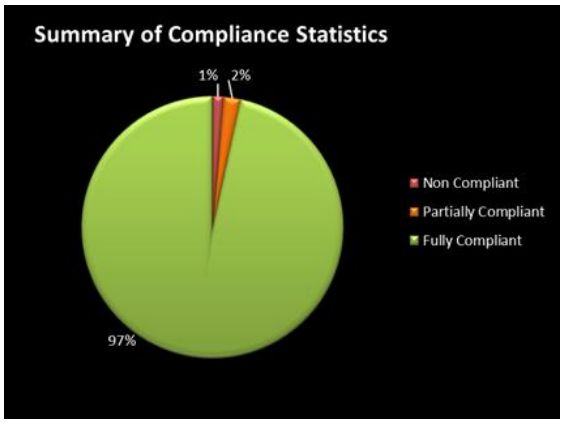


Figure 21: Summary of compliance with the requirements of the Impofu West EMPr (Power Construction).

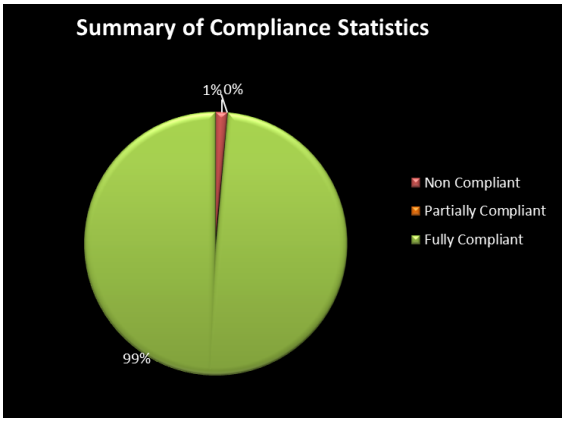


Figure 22: Summary of compliance with the requirements of the Impofu East EA (Power Construction).

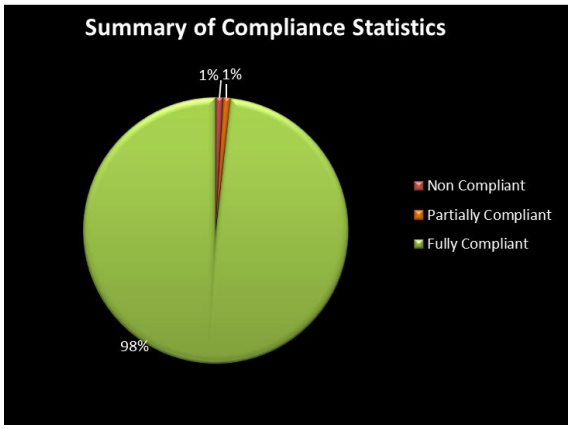


Figure 23: Summary of compliance with the requirements of the Impofu East EMPr (Power Construction).

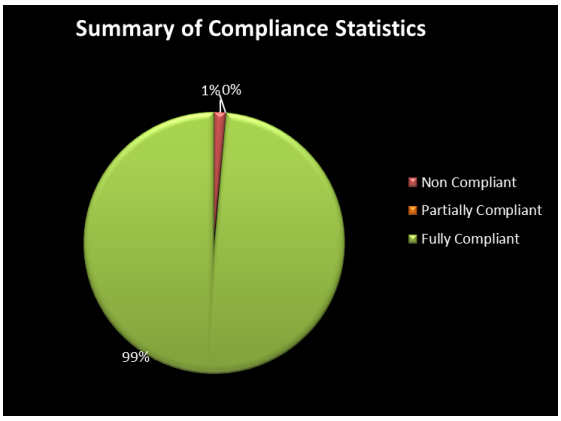


Figure 24: Summary of compliance with the requirements of the Impofu North EA (Power Construction).

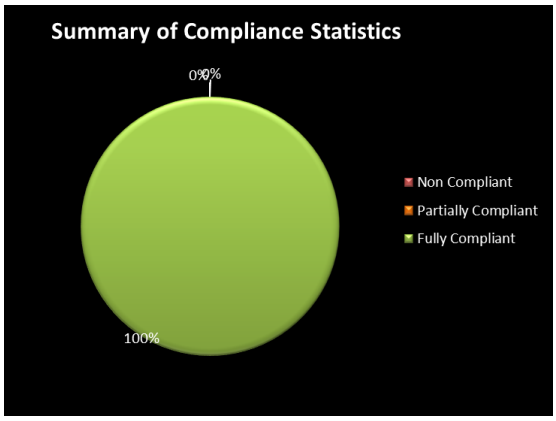


Figure 25: Summary of compliance with the requirements of the Impofu North EMPr (Power Construction).

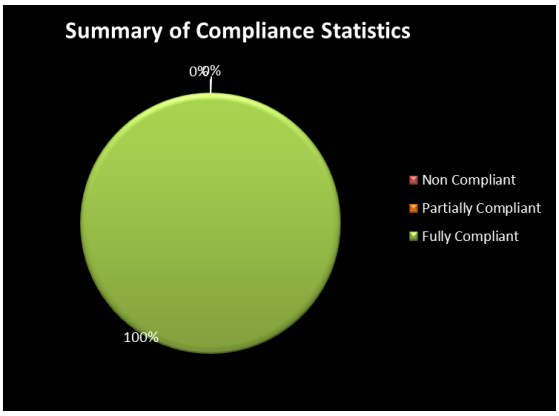


Figure 26: Summary of compliance with the requirements of the Impofu North EA (Nordex).

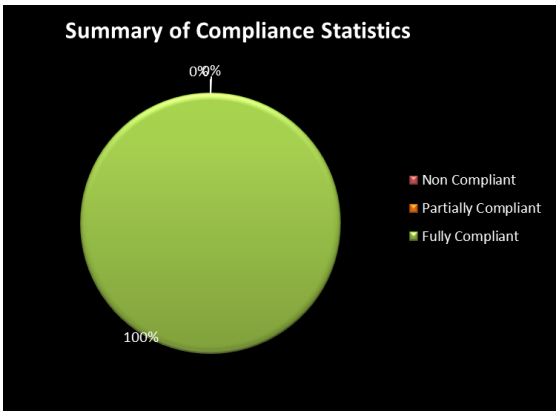


Figure 27: Summary of compliance with the requirements of the Impofu North EMPr (Nordex).

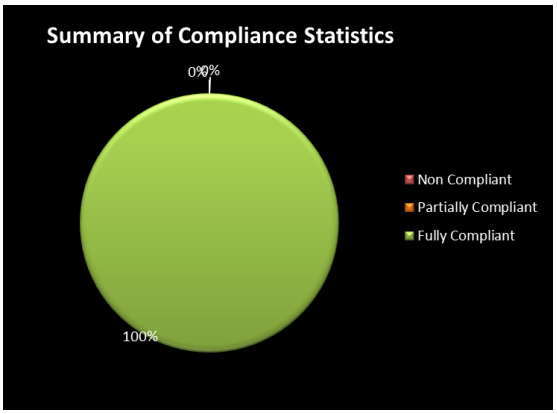


Figure 28: Summary of compliance with the requirements of the Impofu West EA (Nordex).

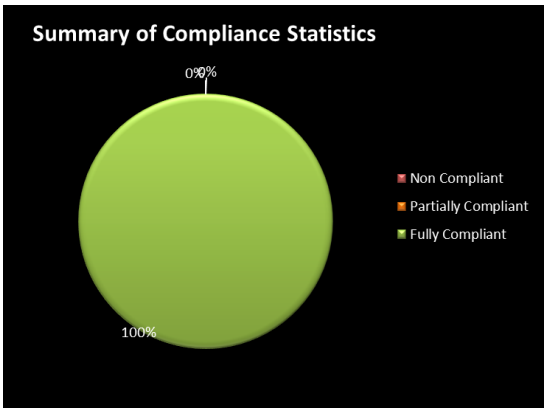


Figure 29: Summary of compliance with the requirements of the Impofu West EMPr (Nordex).

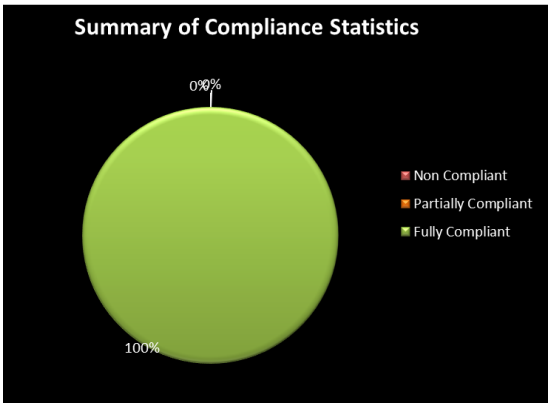


Figure 30: Summary of compliance with the requirements of the Impofu East EA (Nordex).

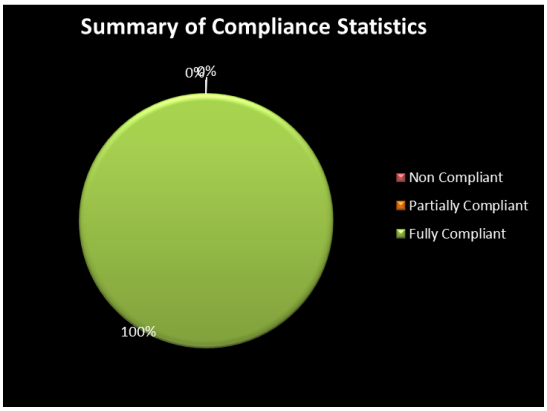


Figure 31: Summary of compliance with the requirements of the Impofu East EMPr (Nordex).

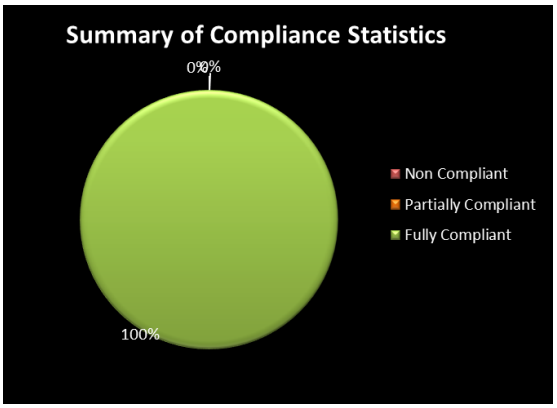


Figure 32: Summary of compliance with the requirements of the Buffer Yard EA (Nordex).

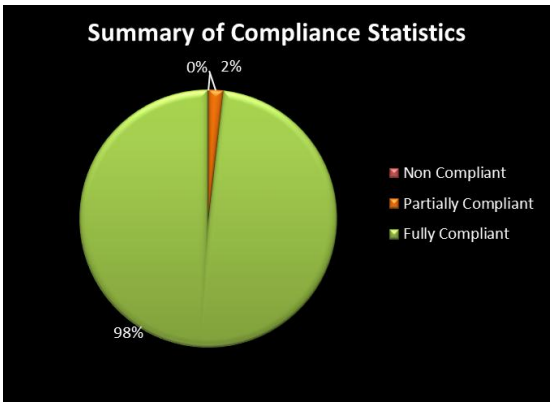


Figure 33: Summary of compliance with the requirements of the Buffer Yard EMPr (Nordex).

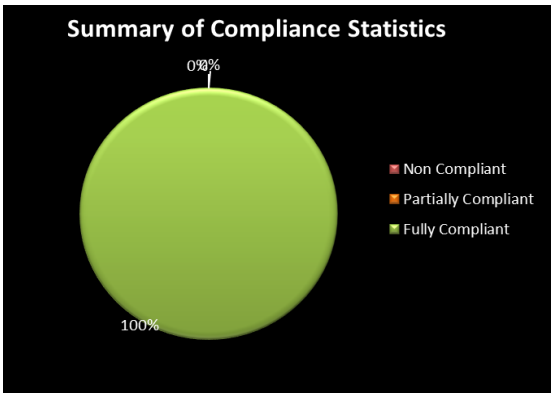


Figure 34: Summary of compliance with the requirements of the Substations EMPr (Brand Besamandla).

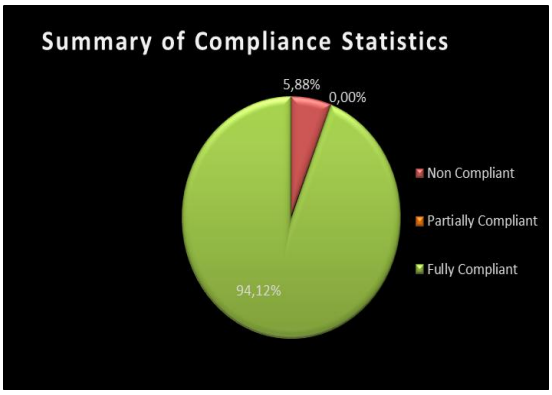


Figure 35: Summary of compliance with the requirements of the Water Use Authorisations (GA) (Power Construction).

5.2 GOOD COMPLIANCES

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

Location	Category	Responsible Party	Description	Photo Reference
Impofu Wind Farm	Pollution Prevention	Power Construction	Decent use of drip trays to prevent soil contamination was observed at Power Construction's working areas. It is recommended that the contractor inspects the integrity of the drip trays continuously.	  Figure 36: Potentially hazardous chemicals stored on impermeable surface

Location	Category	Responsible Party	Description	Photo Reference
Powfontein Substation	Erosion control	Power	Silt fences that were installed at Powfontein substation to manage erosion on the embankment was observed to be effective as there was vegetation establishment and erosion channels were not visible. It is recommended that installing porous barriers to collect silt can dramatically reduce sediment pollution on the opposite sides of the barrier.	 Figure 37: Reduced erosion and vegetation establishment at Powfontein substation
Site Camp	Housekeeping	Nordex	Decent housekeeping was maintained at the site camp amid the de-establishment of the warehouse tent and site camp. It is recommended that the contractor must ensure that good housekeeping is continuously implemented and maintained on the construction site.	 Figure 38: Good housekeeping at Nordex site camp

5.3 AREAS OF CONCERN

Five (05) new concerns were raised by the ECO during the current reporting period.

- During the audit inspection, early onset gully erosion was observed at WTG E12 and W15. The prevalence of this form of erosion around Impofu Wind Farm, especially in the v-drains and along the roads, is concerning. Power's response to erosion on site is to wait it out.
- The topsoil at WTG E1 appeared clumpy and with restricted vegetation growth. Power Construction indicated that this area will be monitored for vegetation regrowth as the topsoil was reinstated at a different time to the rest of the wind farm. It is noteworthy that the delayed vegetation regrowth may be due to ripping/scarification (or topsoil trimming) of wet soil.
- Water ponding around the substation platforms and v-drains on site was observed to be prevalent following rain events. The culvert at West substation, for instance, was observed to have standing water for at least three days after rainfall. The contractor indicated that trapezoidal drains will be sloped as part of regular maintenance works. Where drains are identified to be ineffective maintenance will be conducted.
- Tendons that caused the spillage of potentially hazardous substance at the buffer yard were observed stored in a manner that posed high risk of another spillage to the soil surrounding the buffer yard. This concern was addressed by the following week when the tendons were removed.
- The laydown area at Powfontein substation has shown substantial vegetation regrowth following topsoil reinstatement. However, there remains patches of bare soil on the area and the landowners livestock have started grazing there.

Power Construction still had not removed the soil ingress in the v-drain at Powfontein substation, as indicated in February 2026 reporting. At WTG E9, weeds were growing through the subsoil that was identified as a concern in the previous reporting period. Overall, concerns raised in the previous period 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 39: Early onset of gully erosion at WTG E12



Figure 40: Gully erosion at WTG W15



Figure 41: Compacted topsoil at WTG E1

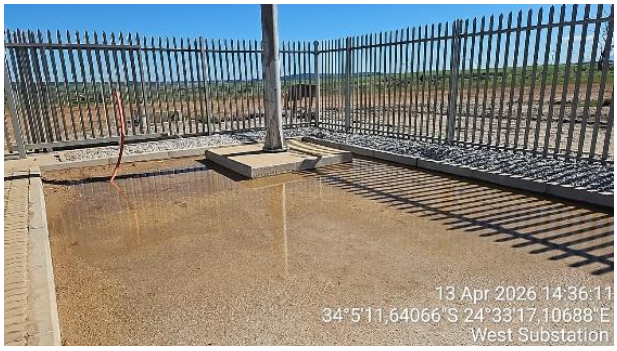


Figure 42: Water ponding still prevalent at West substation



Figure 43: Tendons at the buffer yard stored improperly



Figure 44: Patches on revegetated laydown area at Powfontein substation

5.4 NON-COMPLIANCES

Seven (07) new non-compliances were raised during this reporting period. 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
126	EA 73 **For Power Construction** GA 9 (h)	Freshwater ecosystems located in close proximity to the construction areas must be inspected on a regular basis (especially after rainfall) by the ECO for signs of disturbance, sedimentation and pollution from construction activities. If signs of disturbance, sedimentation or pollution are noted, immediate action must be taken to remedy the siltation and, if necessary, a freshwater ecologist must be consulted for advice on the most suitable remediation measures. The water user must ensure that adequate erosion control measures are implemented at and near all alterations, including at existing structures and/or activities, with	During the audit inspection, evidence of siltation of the wetland close to WTG E8 was observed. The rocks used as energy dissipators in the v-drain for stormwater may have washed away and are no longer effective. Additionally, Power Construction was creating a v-drain at ETG E8 that was directed into the wetland. The environmental representative indicated that this was in	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. All sediment barriers must be inspected and maintained during construction and restoration.	**Open/ Uncorrected**	  Figure 45: Stormwater channels into watercourses

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
	EA 76 **For Power Construction** EMPr 5.3.7.3 **For Power Construction**	particular attention to erosion control at steep slopes and drainage lines. Workers must be made aware of the importance of not polluting rivers or wetlands and of not undertaking activities that could result in such pollution, and this awareness must be promoted throughout the construction phase. Care shall be exercised during all phases of the work to prevent sediment, debris or pollutants from entering any watercourses or waterbodies.	accordance with the landowner's request. A similar observation was made at WTG E11 where, on request of the landowner, the stormwater drain was directed into a drainage line.			
127	EMPr 5.5.1.24 **For Power Construction**	Do not rip and/or scarify areas under wet conditions, as the soil will not break.	At WTG W14, scarification of an area where topsoil was reinstated was observed. This was for the third time since the initial topsoil reinstatement because the landowner was not satisfied with rehabilitation and requested a number of	Every effort shall be made to handle topsoil twice only: once to strip and stockpile, and once to replace, level, shape and scarify.	**Open/Uncorrected**	 Figure 46: Ripping/scarification of wet topsoil at WTG W14

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
			alterations to the stormwater drainage.			
128	EMPr 5.3.15.6 **For Power Construction** EMPr 5.3.15.8 **For Power Construction and Brand Besamandla**	Appropriate general waste (e.g. construction debris, rubble, timber, tins, drums and domestic waste) collection, storage and removal from site shall be implemented. 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.	At WTG 18, inert waste (rubble, subsoil and wooden levels) were left behind after rehabilitation. This deviation was raised in February as well. A similar observation was made at Powfontein substation. The responsible contractor indicated that it had completed the final clean up of the substation (through chicken parade).	Inert waste and rubble, including surplus rock, foundations, spoil and batching plant aggregates shall be disposed in a safe and approved manner. After the material has been removed, the site shall be re-instated and rehabilitated, in accordance with the approved Landscaping and Rehabilitation Plan.	**Closed Out/Corrected** Inert waste was skimmed at WTG 18and the soil scarified to facilitate vegetation growth. The concrete waste at Powfontein substation was disposed the spoil site.	 Figure 47: Rubble waste

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
129	EMPr 5.5.2.8 **For Power Construction**	Monitor backfilled areas for subsidence (as the backfill settles) and fill depressions using available material.	During the audit inspection at WTG W18, depressions were identified in previously backfilled areas, resulting in the ponding of water.	Programme the backfill of excavations so that subsoil is deposited first, followed by the topsoil.	**WIP** Sections that had depressions have been scarified and will be levelled to prevent ponding. Additionally, a channel to redirect water to existing drains.	 Figure 48: Depression from material backfilled at WTG W18
130	EMPr 5.3.15.4 **For Nordex**	Designated facilities for builder's rubble, hazardous waste, and general waste as provided for in the Contractor's camp/s are to be used for the storage of the appropriate waste products that is weather proof and scavenger proof.	Empty 20 L containers that contained Oil Cap were observed next to the general waste skip. This suggested that the skip was overflowing. The environmental representative indicated that the containers were going to be reused.	Designated facilities for builder's rubble, hazardous waste, and general waste as provided for in the Contractor's camp/s are to be used for the storage of the appropriate waste products that is weather proof and scavenger proof.	**Closed Out/Corrected** The empty containers were removed to the hazardous material storage facility before the end of the day.	

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
						 Figure 49: Improperly stored empty containers placed inside hazardous storage facility
131	EMPr Condition 7 Objective 2 **For Nordex** EMPr Condition 7 Objective 11 **For Nordex**	Ensure waste storage facilities are maintained and emptied on a regular basis. Waste management must be a priority and all waste must be collected and stored adequately. Waste should be stored at a licensed facility. It is recommended that all waste be removed from site on a weekly basis to prevent rodents and pests entering the site. Maximum domestic waste storage period will be up to 10 days.	During the audit inspection, a wheelie bin labelled for spill kit use was observed to be overfilled with waste at the buffer yard. On the 9th of March 2026, a similar observation was made at the buffer yard where the hazardous waste skip was overflowing. The skip was emptied using a trailer by a different service provider.	Specific areas must be designated on-site for the temporary management of various waste streams, i.e. general refuse, construction waste, and contaminated waste as required. Location of such areas must seek to minimise the potential for impact on the surrounding environment, including prevention of contaminated	**Closed Out/Corrected** The waste in the wheelie bin was disposed in the general waste skip.	  Figure 50: Full wheelie bin and hazardous waste skip at buffer yard

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
				runoff, seepage, and vermin control.		
132	EMPr 5.3.9.3 **For Nordex**	If potentially Hazardous Chemical Substances are to be stored on site, then: Hazardous Chemical Substance containers shall be situated on a smooth impermeable surface (concrete or 250 micrometre (µm) plastic (plastic must have a minimum of a 5 cm layer of sand on top to prevent damage and perishing)) within an earth bund.	Hazardous material was observed on bare soil, without an impermeable layer to prevent pollution, at the site camp.	Potentially hazardous material shall always be stored on an impermeable surface, albeit de-establishment of the site and delayed housekeeping that that may occur.	**WIP** The general workers moved the containers to the hazardous storage facility constructed at West substation. As part of housekeeping, the contractor must ensure that empty	 Figure 51: Potentially hazardous chemicals stored improperly at Nordex site camp

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 available in the environmental file.

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
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.	**Closed Out/Corrected** The contractor submitted a toolbox talk that was communicated to the responsible supervisor and their team. Monitoring of de-watering activities is monitored.	 Figure 52: De-watering activity with no silt trap in place.
119	**EMPr Condition 7.1 Objective 2** **For Nordex**	Ensure that all personnel have the appropriate level of environmental awareness and competence to ensure continued environmental due diligence and on-going minimisation of environmental harm. This can be achieved through the provision of appropriate	Inadequate housekeeping was observed during audit inspection, with waste materials such as wood and unused construction items not stored in	It is recommended that resources are allocated to the buffer yard as well for regular housekeeping, in addition to the warehouse area/site camp.	**Closed Out/Corrected** Housekeeping at the buffer yard has improved. The remaining	N/A

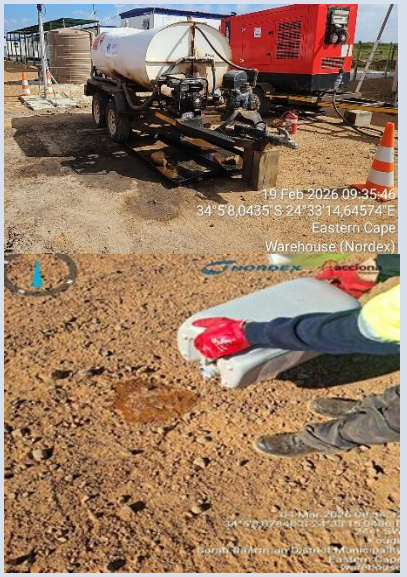
Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		environmental awareness training to all personnel. Records of all training undertaken must be kept. All litter must be deposited in a clearly marked, closed, animal proof disposal bin in the construction area.	designated areas, resulting in untidy working conditions.		empty sand bags were neatly stored. Removal of excess steel for scrapping is ongoing.	
122	EA 59 **For Power Construction** EMPr 5.3.12.9 **For Power Construction** EMPr 5.5.1.13 **For Power**	All areas of disturbed soil must be reclaimed using only indigenous grass and shrubs. Reclamation activities shall be undertaken according to the rehabilitation plan to be included in the final EMPr. Topsoil stripped from different sites of different soil types shall be stockpiled separately and clearly identified as such for return to area of origin, and every effort shall be made to prevent the mixing of topsoil from different sites of different soil types. Monitor the re-growth of vegetative material, and address issues of erosion, trampling, and grazing accordingly.	During audit inspection at WTG E8, topsoil stockpiles were observed to be improperly managed, with visible mixing of topsoil and subsoil. A similar observation was made at E6, where subsoil was stockpiled together with topsoil intended for reinstatement. At East substation, a pedestrian walkway was observed traversing reinstated topsoil. Moreover, there was evidence of significant trampling by cattle, resulting in	It is recommended that workers are well informed of the importance of not mixing topsoil with subsoil or gravel. Moreover, areas under rehabilitation are demarcated as no-go areas and barricade the areas sufficiently.	**Closed Out/Corrected** Disciplinary action was taken with the supervisor and they were issued with a warning.	N/A

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
	Construction		surface compaction and disturbance of the reinstated area.			
120	EMPr Objective 11 **For Nordex** EMPr 5.3.15.9 **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. Hazardous waste shall be stored in sealed and labelled drums, which shall be situated on a smooth impermeable surface (concrete or 250 micrometre (µm) plastic (plastic must have at least a 5 cm layer of sand on top to prevent damage and perishing)) within an earth bund. The impermeable lining shall extend to the crest of the bund and the volume inside the bund shall be 120% of the total capacity of all the storage tanks/bowsers (110% statutory requirement plus allowance for rainfall).	Unlabelled drums located within the bunded area at the buffer yard were noted. In addition, the hazardous waste storage area was not clearly identified or labelled as required.	It is recommended that all waste be stored in the designated waste area and kept separate from usable materials. Hazardous Chemical Substances shall be stored in appropriate containers which are **all** clearly labelled and sealed.	**WIP** The liquid waste drum at the buffer yard was clearly labelled and sealed properly. However the storage area and hazardous skip remained unlabelled. The absence of clear, durable identification of the hazardous waste area increases the risk of misuse of the disposal area.	 Figure 53: Compromised sand bund at buffer yard

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
121	EMPr 5.3.11.9 **For Power Construction** EMPr 5.5.1.13 **For Power Construction**	Topsoil stripped from different sites of different soil types shall be stockpiled separately and clearly identified as such for return to area of origin, and every effort shall be made to prevent the mixing of topsoil from different sites of different soil types. Place topsoil in the same area from where it was stripped. If there is insufficient topsoil available from a particular soil zone to produce the minimum specified depth, topsoil of similar quality may be brought from other areas of similar quality. The suitability of substitute material will be determined by means of a soil analysis addressing soil fraction, fertility, pH and drainage.	During the audit inspection, topsoil which was said to be from the buffer yard was used to rehabilitate another property at far West, turbine W15. This was without the knowledge of the contractor EM or ECO.	It is recommended that ongoing monitoring of vegetation and weed establishment should be undertaken to confirm the effectiveness of rehabilitation measures. The contractor is further advised to consult with the ECO prior to implementing any deviations from the approved EA/EMPr requirements.	**Closed Out/Corrected** During the audit inspection, full vegetation regrowth was observed the around affected area.	 Figure 54: Vegetation regrowth on topsoil from another property

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
123	EMPr 5.3.9.3 **For Nordex** EMPr 5.3.15.12 **For Nordex**	If potentially Hazardous Chemical Substances are to be stored on site, then: • Hazardous Chemical Substances shall be stored in appropriate containers which are clearly labelled and sealed. • Hazardous Chemical Substance containers shall be situated on a smooth impermeable surface (concrete or 250 micrometre (µm) plastic (plastic must have a minimum of a 5 cm layer of sand on top to prevent damage and perishing)) within an earth bund. The impermeable lining shall extend to the crest of the bund and the volume inside the bund shall be 120% of the total capacity of all the storage tanks/bowsers (110% statutory requirement plus allowance for rainfall). 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	During the January ECO Audit, the hazardous chemical substance (HCS) storage facility where Nordex stores hazardous substances was observed filled almost to the roof with containers. This was raised as a concern and the EO indicated the issue will be resolved by the audit inspection in February. Moreover, it was observed that liquid hazardous waste continues to be stored in unlabelled containers together with usable site material.	It is recommended that all waste be stored in the designated waste area and kept separate from usable materials. Additionally, not only one but all storage waste containers shall be clearly labelled. Moreover, the contractor shall ensure that the bund capacity is clearly displayed at the HCS storage facility.	**Closed Out/ Corrected** The hazardous chemical substances were moved to the permanent hazardous storage facility at West substation with the relevant signage erected.	 Figure 55: Excess HCS agents removed from the facility with limited capacity.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		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.				

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
124	EA 108 **For Nordex** EMPr 5.3.9.14 **For Nordex**	Leakage of fuel must be avoided at all times and if spillage occurs, it must be remedied immediately. The Contractor shall submit a Method Statement to the Contract Manager and ECO for approval of the procedure for dealing with an accidental hydrocarbon spill: • Any single spill in excess of 200 shall be reported to the Department of Water and Sanitation (DWS), and the Proponent. • The responsible operator shall have the required training to use the spill kit, or to contain the spill. • The activity causing the spill is to cease, and the spill is to be contained using a spill kit, sand berms, sandbags, sawdust, absorbent materials or similar. • Should any soil become contaminated by oil or fuel spills then the soil shall be removed. • Contaminated soil and material shall be stored in bags or sealed and labelled drums in the designated hazardous waste area of	A small diesel spillage was observed at the warehouse area during the audit inspection. Moreover, multiple dark staining patches were noted around the mobile diesel bowser. The EO indicated that these marks resulted from the application of Oil Cap as part of remedial efforts following previous spill incidents. However, the Oil Cap treatment appeared to have been applied selectively and not consistently across all visibly stained areas where spillages are reported to have occurred.	The contractor should ensure that spillages are cleaned properly, and contaminated soil and material be stored appropriately for safe disposal.	**Closed Out/ Corrected** Evidence of application of Oil Cap was submitted to the ECO.	 Figure 56: Diesel spill noted at Nordex warehouse area.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		the site and disposed of in accordance with Section 0. • Any contaminated soil that cannot be removed is to be treated in situ as determined by the ECO.				
124	EMPr 5.2.1.8 For Brand Besamandla EMPr 5.3.16.2 For Brand Besamandla	Suitable stormwater management systems shall be installed and monitored during the first few months of use. Any erosion / sedimentation must be prevented. It may be necessary to design specific protection measures that prevent the concentration of stormwater flows. These could include the construction of permanent or temporary drainage works which shall be designed to avoid scouring and erosion within the channe	Water damming was observed at the East Substation. Persistent ponding presents a risk to infrastructure integrity, may accelerate deterioration of civil works, and creates conditions conducive to biological growth and pest activity. During construction, Power-Besamandla indicated that the works were executed in accordance with the approved drawings. However, the presence of ongoing ponding suggests that the current design and/or implemented	Stormwater systems are to be inspected on an frequently to ensure that the systems are functional.	**WIP** During the audit inspection, final works on the installation of subsoil drainage pipes was observed at Impofu East substation. At West substation, a bit of water ponding was observed. The responsible contractor indicated that yard stone was yet to be pored to increase evaporation and facilitate	 Figure 57: Water ponding inside East substation rectified by increasing subsoil drainage.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
			drainage measures are inadequate to effectively manage stormwater runoff.			
125	EMPr 4.1.3.2 **For Power Construction** EMPr 5.4.1.1 **For Power Construction and Brand Besamandla**	Written consent is to be obtained for the use (access or occupation) of private land outside of the approved development sites. The use (access or occupation) of private properties outside of the approved development sites shall not occur without the Contractor proving that the affected landowner/ authorised representative has provided the Proponent with consent in writing.	During site inspection, gravel form the removal of blade fingers was observed being deposited opposite WTG E17. According to the contractor, this was a borrow pit that the landowner requested verbally that it be rehabilitated. However, the area appeared to be a spoil area with heaps of gravel stockpiled there. A similar non-conformance was identified for Brand Besamandla, as evidence of a landowner agreement	The contractor should ensure that getting written landowner consent remains a priority, similar to the pace at which the contractor aims to get rehabilitation signoff from the landowners.	**Open/ Uncorrected**	 Figure 58: Excess gravel stockpiled on private land opposite WTG E17. Written consent not submitted to ECO.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
			authorizing the temporary storage of empty conductor drums was not submitted to the ECO.			

5.8 INCIDENTS

Two (02) incidents were reported during the current reporting period. On the 13th of March 2026, a bird fatality of what was suspected to be a Jackal Buzzard raptor was reported WTG N14. It was noted that the approved Avifaunal Monitoring Plan did not make provision for the commissioning phase of the project, thus rendering it insufficient in addressing the identification, handling and reporting of bird fatalities. In the interim, the EGP Environmental Team conducted a carcass search at WTG N15, N11 and N12 during which no carcasses were identified. Additionally, a freezer was procured for temporary storage of the carcasses.

On the 27th of March 2026 during the current reporting period. At the buffer yard, a hydraulic oil hose ruptured on a telehandler during the lifting of Dokas, causing a spillage. It was estimated that at 3 L of hydraulic oil was spilled on G5 material. The activity was stopped immediately, and a sand berm was created to contain the contents of spillage. For final clean up, Oil Cap was applied to the gravel area. 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

Zero (0) new complaints were reported this reporting period. Landowner issues that were raised during the previous reporting period are continuously being addressed. For instance, topsoil trimming and other landscaping issues are rectified through an iterative consultation process with the landowners. Some of the landowners at Impofu West have signed-off on satisfactory soil reinstatement.

It should be noted that all environmental complaints should be reported to the ECO as soon as they occur.

6 CONCLUSION

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

Table 5: Summary of observations noted.

Description	Number Raised during Reporting Period	Total Number Raised	Total Number Open/ Uncorrected
Areas of Concern	**5**	**54**	**6**
Non-compliances	**7**	**132**	**9**
Non-compliance Reports	**0**	**3**	**0**
Incidents	**2**	**40**	**2**
Complaints	**0**	**18**	**1**

7 ASSUMPTIONS AND LIMITATIONS

The following assumptions and limitations apply to this report:

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