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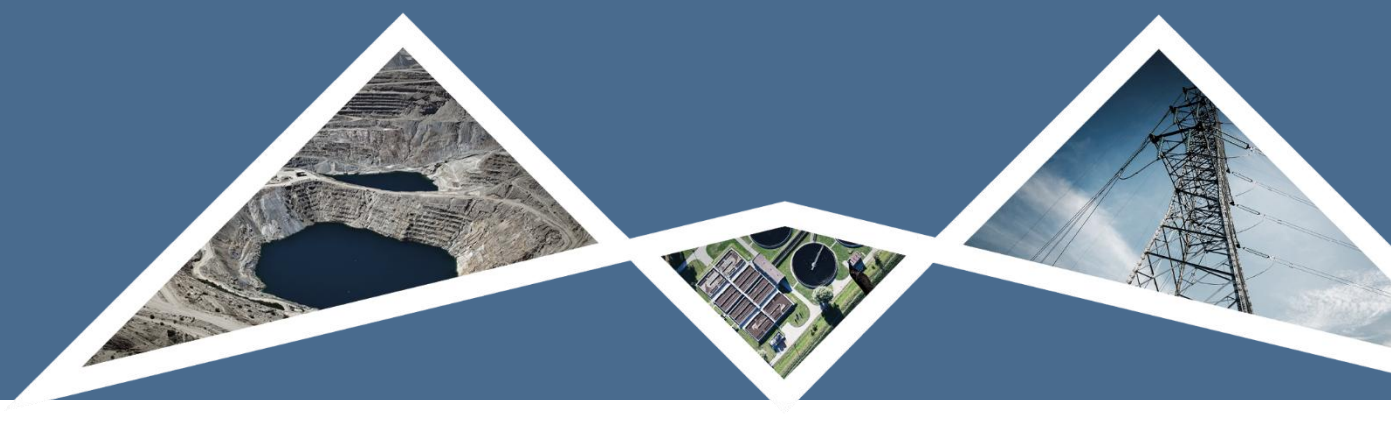
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JULY 2026 MONTHLY ECO AUDIT REPORT

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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2026/08/14	REVISION 1	Final ECO Report

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Appendix 1: NCR’s issued in July 2026

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 July 2026 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.

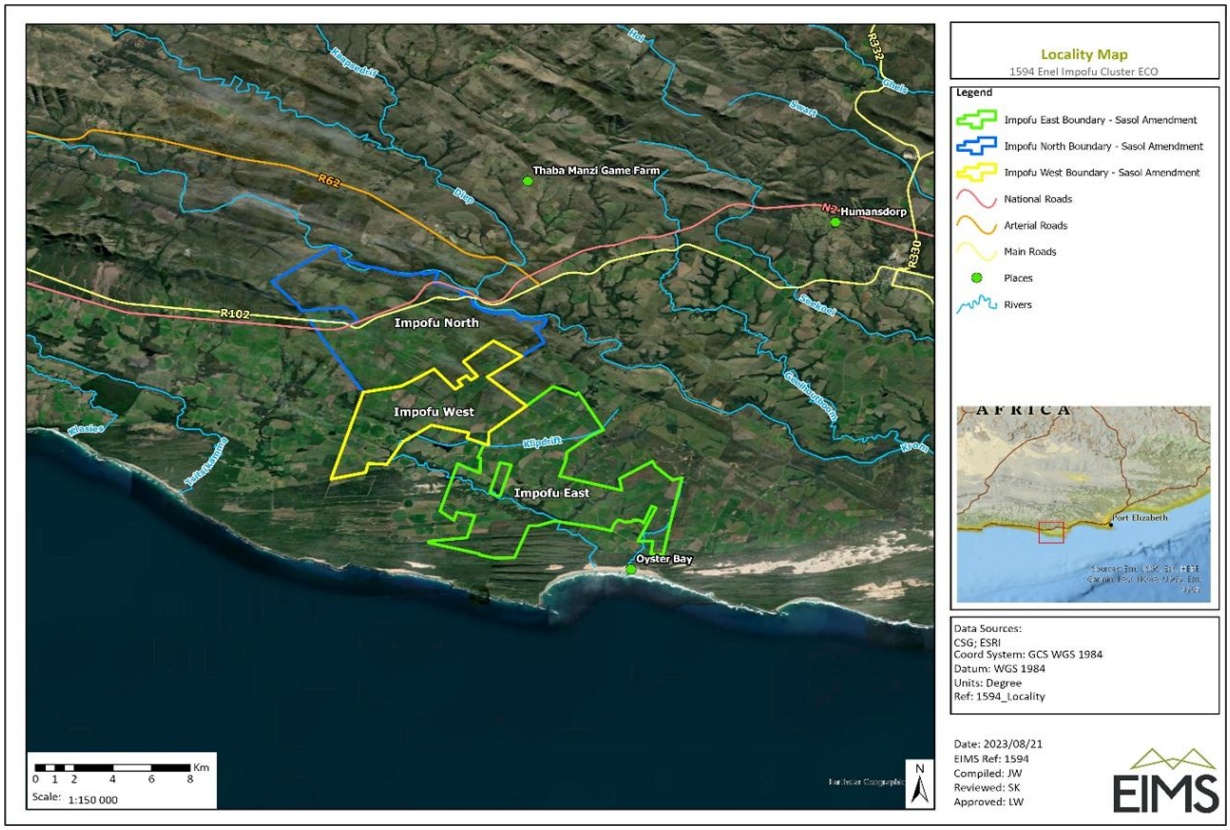


Figure 1: Impofu Cluster boundaries.

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 Tembo for transport and logistics.

Daily construction progress meetings where planned activities, environmental requirements, site-specific risks, and compliance obligations were reviewed were no longer held for the current reporting period.

During the July 2026 monthly ECO audit, improvement was observed with compliance to the requirements of the EA, EMPr, and associated permit conditions. Continued focus is, however, required for waste management, housekeeping, pollution prevention, timely corrective actions of deviations, and implementation of duty of care, to maintain the project's positive compliance performance. It is noteworthy that Power has failed to submit monthly monitoring documents on time, therefore compliance verification for the current reporting period was not done. Consequently, the updated complaints, incident, and waste monitoring registers were not available to the ECO.

During the current reporting period, it was observed that Power made progress with topsoil reinstatement at their site camp and the West Substation laydown area. It is concerning, however, that inadequate sloping has been continuously observed at the East and West Substation laydown areas. This could encourage water ponding. It was good to observe that vegetation regrowth was improving inside stormwater channels and areas that experienced intense erosion.

Two a non-conformance records (NCR) were issued by the ECO. The first was issued to Nordex for littering and poor waste control at the buffer yard. The Corrective Action Report (CAR) Nordex submitted was considered insufficient by the ECO. The second NCR was issued to Power for not providing evidence to substantiate that rubble waste from the decommissioned bund structures that contained hazardous material was safe to bury in a borrow pit. Concerns were raised during previous reporting period regarding these potential non-compliances.

The ECO contract was terminated by the EA holder at the end of July 2026. As a result, environmental compliance monitoring ceased before all construction-related activities were completed and prior to full site rehabilitation. This has created a risk of significant environmental impacts arising from inadequate implementation of the EMPr, as critical activities can no longer be independently monitored. These include, among others, the management and disposal of construction waste, rehabilitation of disturbed areas, and verification of compliance with environmental mitigation measures.

2 DETAILS OF THE ECO

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

2.1 EXPERTISE OF THE ECO

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

2.2 DECLARATION OF INDEPENDENCE

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

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

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

Signature: 

3 SCOPE, PURPOSE AND OBJECTIVE OF THE AUDIT

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

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

4 AUDIT METHODOLOGY

4.1 PROCEDURE FOR THE AUDIT

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

During the audit, the ECO requested the following information:

- EA, EMPr, permits, licences, all other relevant authorisations and approvals;
- Environmental management monitoring such as water use registers, 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 by Power-Besamandla Consortium.

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

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. activities. Furthermore, 10 m^3 of effluent was removed from the conservancy tanks at West substation. The waste register for Power for the current reporting period is outstanding.

Nordex appointed EnviroServ (Pty) Ltd as a service provider in April for collection and disposal of general waste at registered landfill site, Humansdorp Landfill site (permit number: 12/9/11/P53) in Kouga Local Municipality. According to the contractor, there was no general waste disposed off site during the current reporting period, although full general waste skips were observed during ECO site inspections.

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). Evidence of the waste inventory by Power is outstanding for the current reporting period. Nordex reported that there was no hazardous waste removed from site for disposal.

Sewage Waste

Power Construction appointed a service provider for chemical toilets, Bidvest Toilet Hire (Bidvest). Bidvest service, collect and dispose effluent at a registered treatment plant (Fishwater Flats Wastewater Treatment Works- licence number: 12/9/11/L433/1) at Nelson Mandela Bay Municipality. Moreover, Power Construction appointed 'Sewerage works (Pty) Ltd' to service the conservancy tanks at their site camp establishment. The waste register for Power for the current reporting period is outstanding.

Nordex appointed Bidvest and Mandsons for servicing portable toilets and the conservancy tank, respectively. In July 2026, a total of 10 m^3 of effluent was collected from Nordex site camp and disposed at a registered treatment plant (Fishwater Flats Wastewater Treatment Works- licence number: 12/9/11/L433/1) at Nelson Mandela Bay Municipality. It should be noted that this is not the accurate quantity as the service provider used the capacity of the sewage collection tank as the reference.

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 to flush toilets at the site camps and for dust suppression and road maintenance. Nordex used a total of 0.4 m^3 of water during the current reporting period. Water consumption for the July 2026 was not available at the current reporting period, therefore monitoring of extraction of water from the registered borehole could not be implemented. A total of 21 052 m^3 of water has been abstracted from the registered boreholes between 11 January 2025 and June 2026.

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

Ad hoc audit site inspections were done conducted on the 23rd and 24th of July 2026. Activities for the current reporting period include the following:

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

- Landowner inspections and snags.
- Topsoil reinstatement at West substation laydown.
- Silt removal and drainage works.
- Maintenance of stormwater channels.
- Decommissioning of site camp and topsoil reinstatement.
- Maintenance of turbine bases.
- Housekeeping.

Brand Besamandla has completed works at the substations. Their main activities for the current reporting period included:

- ESKOM Snag list
- Housekeeping at Impofu Wind Farm
- Rectifying Post-construction audit findings at Algoa substation.

Nordex was involved in blade repair at WTG E2 and maintenance of the gearbox at WTG W8. Servicing activities inside the turbines are ongoing.

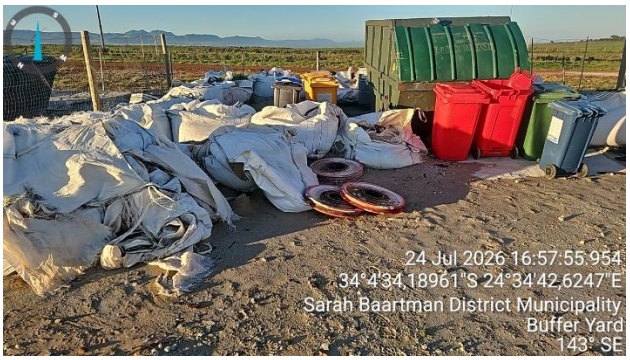


Figure 2: Poor storage of hazardous waste storage at the Buffer Yard.



Figure 3: Ponding of water persistent at Powfontein Substation.



Figure 4: Groundwater visible at surface level of the borrow pit.



Figure 5: Waste from the buffer yard causing litter around it.



Figure 6: Vegetation re-establishment around erosion at WTG E12.



Figure 7: Undercutting of stormwater drainage channel due to storm water.



Figure 8: Blocked culvert at WTG E12 resulting in ponding inside the stormwater channel.



Figure 9: Blocked culvert at WTG E1 and requires the removal of silt.



Figure 10: Bird fatality recorded at East Substation.



Figure 11: Vegetation re-growth inside natural storm water channel at WTG W8.



Figure 12: Vegetation regrowth on slope at WTG E3.



Figure 13: Replacement and redistribution of topsoil at the Power site camp.

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 5.1 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.

Brand Besmandla

The audit scope at the substations was limited due to reduced site activities by Brand Besamandla. During the current reporting period, the ECO did not observe any active works by the contractor. Furthermore, submission of the monthly reports that indicate the monthly activities was not available at the time of reporting.

Nordex

Nordex's primary activities were largely confined to inside the turbine and were therefore excluded from the scope of the audit inspection. Consequently, only the EA and EMPr conditions applicable to the Impofu West Wind Farm were assessed for the current reporting period.

The contractor achieved a straight and weighted compliance score of 99.27% against requirements of Impofu West EA. Compliance with requirements of Impofu West EMPr remain unchanged as the activities and compliance level have stayed the same.

For the buffer yard, the contractor achieved a straight and weighted compliance score of 96.78% against requirements of the EA. Compliance against the EMPr requirements was higher than the previous reporting period, with straight and weighted scores of 92.31%, respectively.

Power Construction

During site inspections, the contractor engaged in turbine dewatering activities as part of correction of snags identified during the construction phase. However, compliance level could not be verified as the monthly monitoring documents were not available at the time of reporting.

Deviations from the requirements of the EA and EMPr that were recorded during the audit inspection are illustrated below:

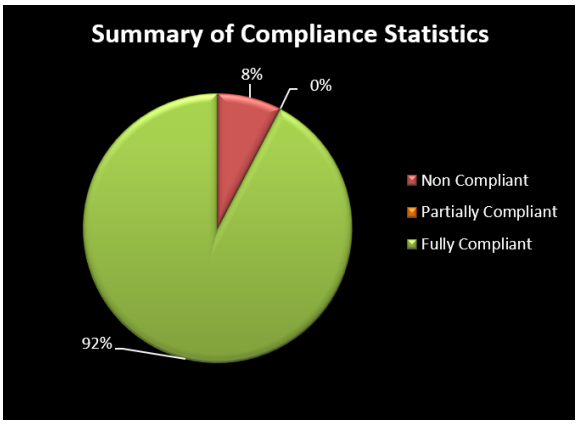


Figure 14: Summary of compliance with the requirements of the Buffer Yard EA (Nordex).

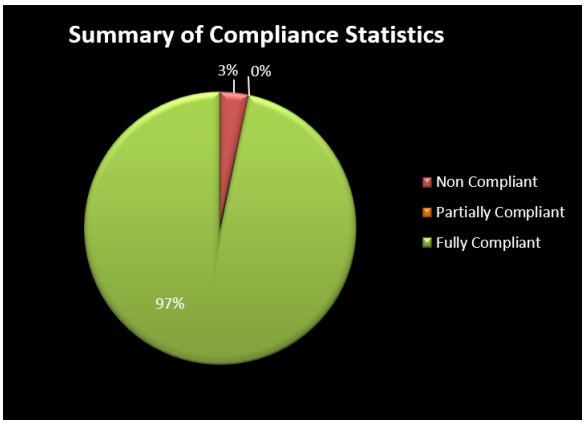


Figure 15: Summary of compliance with the requirements of the Buffer Yard EMPr (Nordex).

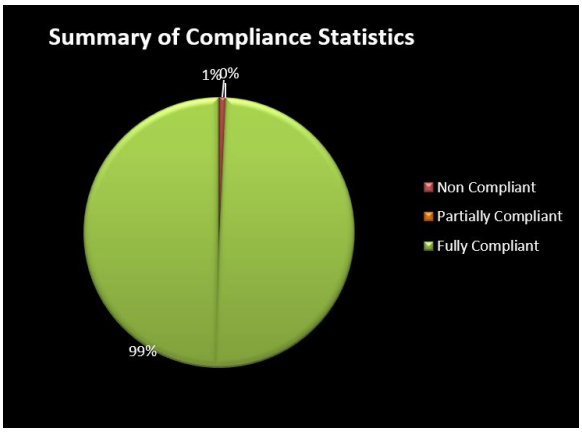


Figure 16: Summary of Compliance with the requirements of the Impofu West EA (Nordex).

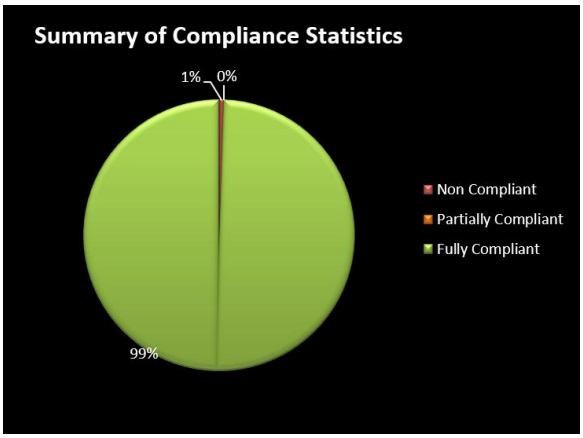


Figure 17: Summary of Compliance with the requirements of the Impofu West EMPr (Nordex).

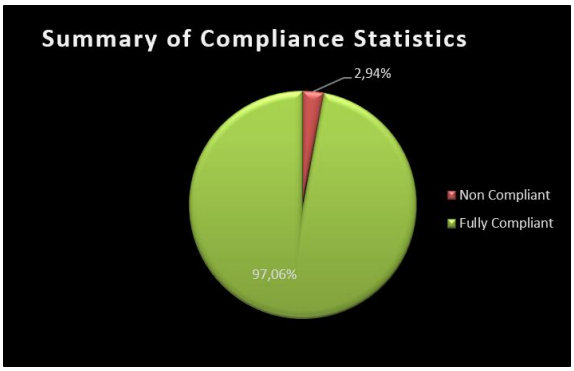


Figure 18: Summary of Compliance with the requirements of the General Authorisation (GA).

5.2 GOOD COMPLIANCES

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

Location	Category	Responsible Party	Description	Photo Reference
WTG E10	Soil erosion mitigation	Power Construction	During site inspection, it was observed that the contractor used gravel to fill gully erosion visible on slopes at WTG E10. There was no indication of additional erosion areas that needed filling, however, excess soil was left on the blade finger area. It is recommended that the contractor ensures that housekeeping is conducted immediately after active works on site, and the gravel is removed. Furthermore, to facilitate vegetation growth on this area, it is recommended that the area is scarified and topsoil reapplied.	 Figure 19: WTG E10 slope filled with gravel to mitigate gully erosion.

5.3 AREAS OF CONCERN

There was one (01) new concern that was identified by the ECO during the current reporting period.

- The ECO observed that removal of construction waste according to the waste classification and relevant legislation is not a priority as the contractors continue with site de-establishment. For instance, conservancy tanks that were at Power Construction's site camp were removed and donated to the landowner. The contractor failed to provide evidence of safe decommissioning and removal of the system, as well as the landowner request and agreement letter.

Ponding of water on the outskirts of the substations due to an uneven surface platform still persist at the wind farm. Areas of concern have the potential to become non-compliances or incidents if not adequately considered or addressed, where required.

5.4 NON-COMPLIANCES

Four (04) new non-compliances were identified 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
148	EA 25.4 **For EA Holder**	The ECO must remain employed until all rehabilitation measures, as required for implementation due to construction damage, are completed and the site is ready for operation.	It was noted that the EA holder terminated the ECO contract before all construction related activities were completed and that the ECO was confident of sufficiency of rehabilitation of construction damage being implemented. This presents a major environmental risk as compliance to EA conditions will not be monitored and reported on. Furthermore, overall management of construction related and decommissioning or site de-establishment	It is the responsibility of the EA holder to ensure that adequate rehabilitation of the environment due to construction activities is implemented.	**Open/ Uncorrected**	**N/A**

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
			activities may deteriorate.			
149	Impofu East Wind Farm EA 110 **For Brand Besamandla** Waste Management Plan **For Brand Besamandla**	No dumping or temporary storage of any material may take place outside the designated and demarcated laydown areas, and these must all be located within areas of low environmental sensitivity • It will be the Foreman's responsibility to keep the work area for which they are responsible tidy and free of litter at all times. All personnel will be required to make use of the litter bins provided.	During the audit inspection, it was observed that construction waste had not been removed at the rehabilitated laydown area at East substation. Brand Besamandla was notified of the concrete test blocks and other solid waste that were left at the rehabilitated laydown area. However, correction of the finding was not actioned.	The contractor shall ensure that all construction waste is removed from the project development site. As indicated in the waste management plan, the contractor shall implement a waste tracking system as part of the implementation of Contractor's duty of care. This waste tracking system will be based upon the disposal notes to be obtained from the service provider.	**Open/ Uncorrected**	 Figure 20: Construction waste at East substation laydown area.
150	EMPr 3.8 **For Power Construction**	All records and documents relating to the implementation of this EMPr shall be retained, shall be easily retrievable for the duration of the Contract, and shall be filed by the Contractor for a minimum of 12 months after cessation of activities.	Monthly monitoring documents that were requested by the ECO for the current audit period were not available at the time of reporting.	Timely submission of monthly monitoring documents by the contractor is recommended.	**Open/ Uncorrected**	**N/A**

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		These records and documents must be made available to the Contract Manager, ECO and/or relevant authority upon request.				
151	EMPr 5.3.15.6 **For Power Construction** Waste Management Plan **For Power Construction**	Appropriate general waste (e.g. construction debris, rubble, timber, tins, drums and domestic waste) collection, storage and removal from site shall be implemented. • Waste shall be removed daily from areas remote from camp and transferred to the appropriate waste storage facility. All non-recyclable litter and refuse shall be disposed of off-site at a licensed landfill facility approved by the Contract Manager and ECO. Documentation (waste manifest) must be maintained detailing the quantity, nature and fate of any regulated waste. Waste disposal records must be available for review at any time.	During the current report, the ECO requested that the contractor submit evidence of the landowner request for the conservancy tanks from the site camp, and that they had accepted the potential risks associated with their ownership. Additionally, the contractor was to submit the method statement implemented during their removal. The contractor responded, *"Hi Sisipho, The agreement falls outside the scope of the project, as the property in question is owned by Power. As such, it is entirely at our discretion*	It is recommended that the contractor submit a method statement that is specific to the activity mentioned, and not merely refer to the generic method statement and waste management plan during the construction phase.	**Open/ Uncorrected**	 Figure 21: Conservancy tank from Impofu West Wind Farm stored at old concrete batching plant.



Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
			how we deal with or dispose of it, particularly since it is no longer located on the wind farm property."			

Open/ Uncorrected

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. Two (2) NCR's were issued during the current reporting period. The first was issued to Nordex on the 9th of July 2026 for poor waste management at the Buffer Yard. The contractor failed to thoroughly remove general waste that blew from the buffer yard to the neighbouring extent of Impofu West Wind Farm after the ECO raised the finding in the report. This resulted in litter along the fence of the buffer yard. Furthermore, the contractor did not submit the implantation of correction action and the subsequent corrective action report (CAR) as per ECO request.

The second NCR was issued to Power Construction on the 17th of July 2026. The contractor failed to submit substantive evidence for the use of rubble waste from a decommissioned diesel tank bund and workshop area to rehabilitate a borrow bit. A concern was submitted to the contractor relating the potentially hazardous nature of the rubble waste and its potential impact to underground water. It is noteworthy that the borrow bit has a high water table. Details of the NCR's are attached in Appendix 1.

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 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 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 (20 August 2025).

It should be noted that avifaunal monitoring of the Martial Eagles was last conducted on the 20th of August 2025. Impofu Wind Farm commenced with the Operation Phase on the 19th of June 2026. Therefore, taking into account that monitoring of the Martial Eagle was mainly required during the construction period and their breeding season would likely have been after construction was complete, there would not be a monitoring event occurring in 2026.

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
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.	**Work in Progress (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 waste area increases the risk of waste mixing.	 Figure 22: Compromised sand bund at the buffer yard.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
126	EA 73 **For Power Construction** GA 9 (h) EA 76 **For Power Construction**	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 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	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 accordance with the landowner's request. A similar observation was made at WTG E11 where, on request of the landowner, the	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** Power construction reported that additional dissipators were installed. However, during the audit inspection it was evident that these were not sufficient or strategic.	   Figure 23: Stormwater channels into watercourses.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
	EMPr 5.3.7.3 **For Power Construction**	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.	stormwater drain was directed into a drainage line.			
134	EA 94 **For Applicant** EA 121 **For Power** EMPr 5.3.16.1 **For Power**	The holder of this authorisation must reduce visual impacts during construction by minimising areas of surface disturbance, controlling erosion, using dust suppression techniques and restoring exposed soil as closely as possible to their original contour and vegetation. Anti-erosion measures such as silt fences must be installed in disturbed areas. The holder of this authorisation must reduce visual impacts during construction by minimising areas of surface disturbance, controlling erosion, using dust suppression techniques and restoring exposed soil as closely as possible to their original contour and vegetation.	Erosion across the Impofu East Wind Farm suggesting its not under control During the audit inspection, early onset gully erosion was observed at WTG. The prevalence of this form of erosion around Impofu Wind Farm, especially in the v-drains and along the roads. This observation was raised as a concern the previous reporting period.	Stabilisation of cleared areas to prevent and control erosion shall be pro-actively managed by the Contractor. It is recommended that more aggressive measures of stabilizing sloped areas are implemented. For instance, hydroseeding where revegetation is urgent or where slopes are problematic Although majority of the turbines are constructed on a cut-and-fill platform, soil instability poses high risk of erosion.	**Closed Out/ Corrected** During site inspection, it was observed that vegetation had re-established, therefore reducing the risk of further erosion.	 

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
	EMPr 5.5.1.23 **For Power**	Rip and / or scarify along the contour to prevent the creation of down-slope channels.				 Figure 24: Vegetation regrowth on eroded areas at Impofu East Wind Farm.
138	EMPr 5.3.16.1 **For Power** EMPr 5.5.1.8	All reasonable measures shall be taken to limit erosion. • Special attention shall be given to ensure the protection of topsoil, overburden, spoil and materials stockpiles from the erosive elements. • Any runnels or erosion channels developed during the construction period or during the vegetation establishment period shall be backfilled and compacted, and the areas restored to a proper condition. Revegetation and maintenance shall occur as per the methods described and areas of the site	The laydown area at Powfontein substation has shown significant vegetation growth following topsoil reinstatement. However, there are still patches of bare soil on the area, subsoil exposed and depressions that encourage water ponding. This was raised as a concern in the previous reporting period.	Any runnels or erosion channels developed during the construction period or during the vegetation establishment period shall be backfilled and compacted, and the areas restored to a proper condition.	**Work in Progress (WIP)** Power is addressing erosion issues across the wind farm either through reshaping slope inclines, or re-scarification.	NA

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
	For Power EMPr 5.5.1.31 **For Power**	identified in the Landscaping and Rehabilitation Plan. Monitor the re-growth of vegetative material, and address issues of erosion, trampling, and grazing accordingly.				
143	EMPr 5.3.10.2 **For Power**	Cement powder has a high pH, and spillage of cement powder and concrete slurry can affect soil and water pH. Spillage on permeable surfaces shall be prevented, and cement laden water/runoff shall be collected and disposed of as water containing waste.	Concrete spill that was noted during the previous reporting period (01 June 2026) had not been removed on RN22 (**Error! Reference source not found.**). Additionally, sand that was used for mixing the concrete during the activity was not removed. This created a risk of pollution and stunting vegetation growth (**Error! Reference source not found.**).	Hardened concrete from the concrete mixer or washout facility shall be reused or disposed of as builder's rubble at an appropriately licensed spoil facility.	**Open/ Uncorrected** The contractor has not submitted evidence of corrective action implemented for this finding.	 Figure 25: Concrete slurry spilled at Impofu North (top) not removed after it dried (bottom).

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
144	EMPr Objective 2 **For Nordex** EMPr Objective 11 **For Nordex**	Ensure compliance with all national, regional and local legislation with regard to the storage, handling and disposal of hydrocarbons, chemicals, solvents and any other harmful and hazardous substances and materials. Waste management must be a priority and all waste must be collected and stored adequately.	Containers of hazardous liquid material at the buffer yard were observed being stored on the edge of the designated bunded area allocated for hazardous waste storage, resulting in the risk of spillages and non-compliant storage of hazardous waste.	Waste management must be a priority and all waste must be collected and stored adequately. Designated facilities for 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.	**Open/ Uncorrected** Waste storage of hazardous waste in and around the bund at the buffer yard continues to deteriorate.	 Figure 26: Containers with hazardous substance stored on the edge of bund at buffer yard (7 July 2026).  Figure 27: Wheelie bins places at the entrance to the hazardous waste storage area, making the site untidy and causing obstruction.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
145	EMPr Objective 2 **For Nordex** EMPr Objective 11 **For Nordex**	All litter must be deposited in a clearly marked, closed, animal proof disposal bin in the construction area. Ensure that no litter, refuse, wastes, rubbish, rubble, debris and builders wastes generated on the premises be placed, dumped or deposited on adjacent/surrounding properties, and that the waste is disposed of at dumping site as approved by the Council.	During various site inspections, it was observed that litter was situated on the outside perimeter of the buffer yard against the fence. The ECO advised the Contractor of the risks of the litter blowing further into the farmers property and the requirement to appropriately manage waste. However, the Contractor did not acknowledge responsibility for the waste whose source was their area of responsibility.	Housekeeping activities that are regularly conducted in the buffer yard shall thoroughly incorporate waste on and close to the fence. All waste skips and wheelie bins shall be kept secured and closed to prevent the spreading of waste on site.	**Open/ Uncorrected** The contractor has refused to remove the waste, claiming that the waste did not blow from the buffer yard.	 Figure 28: Litter on the edges of the buffer yard.
146	EA 110 **For Power** EMPr 5.3.9.3	Leakage of fuel must be avoided at all times and if spillage occurs, must be remedied immediately. If potentially Hazardous Chemical Substances are to be stored on site, then:	On the 17th of July 2026, during a site inspection at Power site camp, the generator was observed not placed on an impermeable surface, although a	Appropriately contain any generator diesel storage tanks, machinery spills (e.g., accidental spills of hydrocarbons oils, diesel etc.) in such a way as to prevent them leaking and entering the environment.	**Open/ Uncorrected** The Contractor did not report on how soil contamination was addressed. It should be noted that all	

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
	For Power	• 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).	drip tray was available next to it. The Contractor was advised on the corrective action for the deviation. However, the same observation was made on the 24th of June 2026 during site inspections and diesel spillages were noted around the generator. Pollution prevention by the Contractor is a principle that requires reinforcing.	Pollution and degradation of the environment shall be avoided, or, where they cannot be altogether avoided, are minimised and remedied.	equipment has been removed from the site camp and topsoil reinstated.	 Figure 29: Operational generator placed directly on the ground continuously rectification.
147	EMPr 5.3.11.8 5.3.12.8 **For Nordex and Power** EMPr 5.3.3.4 **For Power**	Every effort shall be made to handle topsoil twice only: once to strip and stockpile, and once to replace, level, shape and scarify. The disturbance to topsoil shall be minimised, and compaction or removal of topsoil shall be restricted wherever possible (e.g.	Rehabilitated areas at WTG W8 and the East substation were observed to be disturbed by subsequent repair activities that occurred at different times. The Contractors were advised to correct the don-conformance as	Disturbed areas must be rehabilitated as soon as possible after construction with locally indigenous plants to enhance the conservation of existing natural vegetation on site. Reclamation activities shall be undertaken according to the	**Work in Progress (WIP)** Power Construction reinstated topsoil at East substation where installation of addition subsoil	

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
	and Nordex	access routes and parking areas, and activity areas).	soon as practicably possible.	rehabilitation plan to be included in the final EMPr.	drainage was conducted. The disturbance of topsoil at WTG W8, however, has not been addressed by Nordex.	 Figure 30: Rehabilitated area at WTG W8 (bottom) disturbed by additional active works.

5.8 INCIDENTS

There were two (02) incidents that were reported by the ECO during for the current reporting period. On the 22nd of July 2026, a charred bird was observed behind the IPP building at East Substation, next to the one that was reported during the June 2026 reporting period. The bird type could not be identified due to the bad state it was in. Another bird fatality was reported on the 23rd of July 2026, where the bird was observed crawling with insects close to WTG E4 and reported to the EA holder for removal. It is advised that the bird carcasses are stored according to the bird monitoring programme. Where there is any doubt with regards to species affected, an expert should be consulted to verify the identification and carcass management.

5.9 COMPLAINTS

No new complaints were reported to the ECO during this reporting period. Complaints that are raised during the previous reporting period are being monitored. There have not been complaints from the landowners relating to gates being left open. 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	**1**	**59**	**4**
Non-compliances	**4**	**152**	**12**
Non-compliance Reports	**2**	**5**	**2**
Incidents	**2**	**46**	**0**
Complaints	**0**	**18**	**0**

7 ASSUMPTIONS AND LIMITATIONS

The following assumptions and limitations apply to this report:

- The information contained in this report was sourced from information and data supplied by third parties that is assumed to be complete, valid, and true.
- This report is based on information available at the time. The information, data, observations, and evidence this report is based on is beyond the control of EIMS and may change without notice. EIMS will not be liable for any loss or damage which may arise directly or indirectly because of such changes.
- No representation or warranty, express or implied, is or will be made in relation to, and no responsibility or liability is or will be accepted by EIMS in relation to the accuracy of this report.
- Where reference is made to legislation or other statutory provisions in this report the original legislation or other statutory provisions will always take precedence, and the reader is directed to revert to the original legislation or statutes.

APPENDIX 1: NCR'S ISSUED IN JULY 2026

PREPARED FOR:



PREPARED BY:

EIMS ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

NON-COMPLIANCE/ INCIDENT REPORT

Project ref#:	1594	Contractor:	Nordex Energy SA
EA Ref #:	14/12/16/3/3/1/2776	Client:	Enel Green Power
NCR Issued by:	ECO	Date issued:	2026-07-09
Project Name:	**IMPOFU WIND FARM NEAR OYSTER BAY IN THE EASTERN CAPE**		

1. Description of Non-compliance and/or Incident		
NCR/I Ref#:		**NCR005**
Relevant condition of the EA and/or EMP[1]	Ref Section:	Requirement:
	EMPr Condition 7.1 Objective 12	• All litter must be deposited in a clearly marked, closed, animal proof disposal bin in the construction area.
	EMPr Condition 7.1 Objective 11	• 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. • Waste must be kept to a minimum and must be transported by approved waste transporters to sites designated for their disposal.
	EMPr Condition 5.3.15.7	• 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

[1] The applicant's attention is drawn to the following condition of the EA: "The Generic Environmental Management Programme (EMPr) submitted as part of the BAR (Annexure E) dated 06 November 2019 is approved and must be implemented and adhered to".

		landfill.

Brief description of Non-compliance:

During various site inspections, the ECO observed one general waste skip that was left open at the buffer yard. Additionally, litter was observed along the fence outside the buffer yard, some of which may have blown from the wheelie bins that had fallen on the side. Furthermore, plastic ropes that were used to anchor a portable toilet and/or guard house at WTG W8 during gearbox repair were not removed from site, creating more litter.

Nordex was notified numerous times of these non-conformances, but they were still not rectified at the time of issuing this NCR. The Contractor reported consistently in their weekly reports that housekeeping was being conducted continuously at the buffer yard. However, follow-up site inspections by the ECO indicated otherwise. This suggests that the integrity of the Contractor's reporting has been compromised.

			Corrective Action Required?		Yes☒		No☐
NC:	Yes☒	No ☐	Incident Classification:	N/A ☒	1 ☐	2 ☐	3 ☐



Figure 1: General waste causing litter along the fence outside the buffer yard.

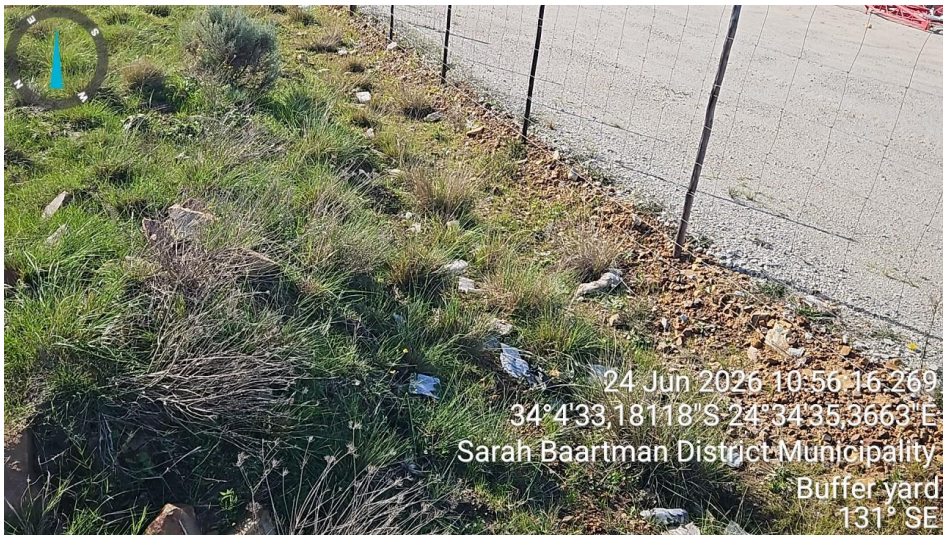


Figure 2: Waste from the buffer yard spreading to surrounding property.



Figure 3: Full general waste skip left open at the buffer yard.

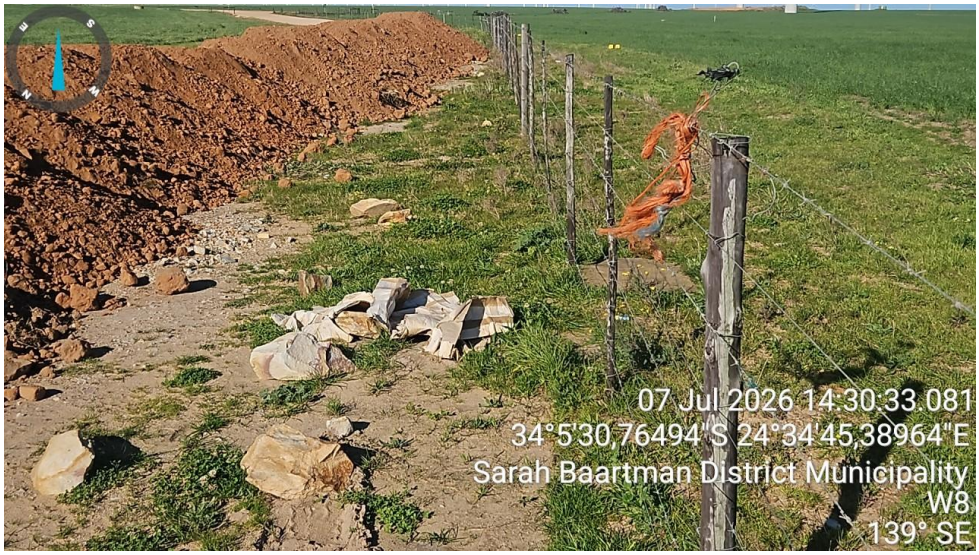


Figure 4: Waste left on site after completion of turbine activities inside WTG W8.

Location of Non-compliance:	Nordex Buffer Yard			
	S	34°4’34.21085”	E	24°34’42.68726”

2. Suggested Corrective Actions

ECO Suggested corrective action[2]:	**As per EMPr Condition 7.1, Objective 11:** • Waste management must be a priority and all waste must be collected and stored adequately. Waste disposal skips shall remain covered and clearly labelled to better manage mixing of waste. The Environmental Representative shall continue with the daily inspections at the buffer yard to ensure that the waste is stored in a manner where it cannot be blown away. Section 2(4)(a)(iv) of NEMA requires that waste is avoided, or where it cannot be altogether avoided, minimised and re-used or recycled where possible and otherwise disposed of in a responsible manner. Appropriate general waste (e.g. construction debris, rubble, timber, tins, drums and domestic waste) collection, storage and removal from site shall be implemented. Waste shall be removed daily from areas remote from camp and transferred to the appropriate waste storage facility. All non-recyclable litter and refuse shall be disposed of off-site at a licensed landfill facility approved by the Contract Manager and ECO.	
	Recommended/Agreed corrective action completion date[3]:	Recommended: 10/07/2026
3. Actual Corrective Actions		
Actual corrective action implemented:		
Corrective action photographic record:		

[2] While EIMS has made every endeavor to supply reasonable, effective and practical suggestions for corrective actions, EIMS does not warrant the effectiveness and/or dependability of such corrective actions. EIMS does not accept any liability for any loss or damage which may directly or indirectly result from any advice, opinion, information, representation or omission, whether negligent or otherwise, contained in this report. EIMS does not accept any liability for any loss or damage, whether direct, indirect or consequential, arising out of circumstances beyond the control of EIMS, including the use and interpretation of this report by the client, its officials or their representatives or agents.

[3] Should the ECO suggested correction action deadline not be reasonable or feasible the objecting party should advise the ECO in writing of such together with reasons and an alternate suggestion within 24hrs of the issuing of the NCR.

Additional Preventative measures?				
NC Closed out:	Yes[4]☐	No☒	ECO Signature:	
			Date:	
			Client Rep Name and Signature:	
			Date:	
			Contractor Rep Name and Signature:	
			Date:	

[4] In the event that post closure of this NCR, there are any additional latent and/or residual impacts resulting from this NCR, there may be further requirements for further management, mitigation, remedial or corrective measures.

PREPARED FOR:

PREPARED BY:

NON-COMPLIANCE/ INCIDENT REPORT

Project ref#:	1594	Contractor:	Power Construction
EA Ref #:	14/12/16/3/3/2/1103	Client:	Enel Green Power
NCR Issued by:	ECO	Date issued:	2026-07-17
Project Name:	**IMPOFU WIND FARM NEAR OYSTER BAY IN THE EASTERN CAPE**		

1. Description of Non-compliance and/or Incident		
NCR/I Ref#:		**NCR006**
Relevant condition of the EA and/or EMP[1]	Ref Section:	Requirement:
	National Environmental Management Act (NEMA)	**Section 28(1): Duty of Care and Environmental Damage** Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment.
	EA Condition 111	Hazardous substances must not be stored where there could be accidental leakage into surface or subterranean water.

[1] The applicant's attention is drawn to the following condition of the EA: "The Generic Environmental Management Programme (EMPr) submitted as part of the BAR (Annexure E) dated 06 November 2019 is approved and must be implemented and adhered to".

<table>
<tr><td>Brief description of Non-compliance:</td><td colspan="8">On the 17th of June 2026, during decommission of the site camp, rubble waste generated from the demolition of the diesel tank bund structure and workshop base was observed to be temporarily stockpiled in a manner that presented a potential risk of soil contamination prior to its disposal in a borrow pit (Figure 1).

The Contractor indicated that Oilcap had been applied to the diesl bund slap on the 19th and 22nd of June 2026 to decontaminate or “neutralize” the hydrocarbons in accordance with the product specification. However, the Oilcap was reportedly applied to visibly stained areas of the bund (figure 2). In addition, no evidence was provided to confirm that the product was applied strictly in accordance with the manufacturer's instructions, including the recommended brushing of the product into the concrete surface prior to curing or “maturing”.

It is noteworthy that there were three (3) sources of potentially hazardous substance-contaminated rubble waste from the site camp, namely:

• Diesel tank bund structure
• Workshop area
• Hazardous chemical material storage bund structure

Given the operation history of the facilities and the potential for prolonged hydrocarbon contamination, the Contractor did not provide sufficient evidence to demonstrate that the demolished concrete and rubble had been assessed and classified as inert or otherwise suitable for disposal in a borrow pit. Accordingly, insufficient evidence was available to demonstrate that an unacceptable pollution risk will not arise from the disposal of the disposal of the rubble into a borrow pit.

At the time of issuing this NCR, the rubble had already been disposed of within a borrow pit. No evidence was available to confirm that the borrow pit was designed, lined, or otherwise authorized to receive potentially contaminated waste. Consequently, it could not be demonstrated that the disposal method adequately mitigated the risk of hydrocarbon leaching to surrounding soils or groundwater, particularly given the relatively shallow groundwater conditions reported for the area.

This practice is inconsistent with the principles of duty of care under NEMA. Section 49A (1)(e) of NEMA (Act 107 of 1998) states that “A person is guilty of an offence if that person: unlawfully and intentionally or negligently commits any act or omission which causes significant pollution or degradation of the environment or is likely to cause significant pollution or degradation of the environment.”</td></tr>
<tr><td rowspan="2"></td><td colspan="3"></td><td colspan="3">Corrective Action Required?</td><td>Yes☒</td><td>No☐</td></tr>
<tr><td>NC:</td><td>Yes☒</td><td>No ☐</td><td>Incident Classification:</td><td>N/A ☒</td><td>1 ☐</td><td>2 ☐</td><td>3 ☐</td></tr>
</table>



Figure 1: Rubble contaminated with hazardous substances stockpiled at Power Construction's former site camp.



Figure 2: Application of Oilcap on visible diesel stains at Power Construction's former site camp.



Figure 3: Hazardous chemical material storage area.



Figure 4: Workshop area.

Location of Non-compliance:	Site Camp, Impofu West Wind Farm			
	S		E	

2. Suggested Corrective Actions

ECO Suggested corrective action[2]:

Sustainable development requires the consideration of all relevant factors including the following:

- that pollution and degradation of the environment are avoided, or, where they cannot be altogether avoided, are minimised and remedied;
- that a risk-averse and cautious approach is applied, which takes into account the limits of current knowledge about the consequences of decisions and actions;
- that negative impacts on the environment and on people's environmental rights be anticipated and prevented, and where they cannot be altogether prevented, are minimised and remedied.

The ECO suggested that the rubble is crushed further and the Oilcap is applied for a longer period of time. Ultimately, the contaminated rubble shall be disposed as hazardous waste. The Contractor shall pursue the selection of the best practicable environmental option when remedying the significant risk of pollution and degradation. A register recording waste storage and removal will be kept on site.

Section 26(1) of the National Environmental Management Waste Act (NEMWA) states:

No person may –

(a) dispose of waste, or knowingly or negligently cause or permit waste to be disposed of, in or on any land, waterbody or at any facility unless the disposal of that waste is authorised by law; or

(b) dispose of waste in a manner that is likely to cause pollution of the environment or harm to health and well-being.

[2] While EIMS has made every endeavor to supply reasonable, effective and practical suggestions for corrective actions, EIMS does not warrant the effectiveness and/or dependability of such corrective actions. EIMS does not accept any liability for any loss or damage which may directly or indirectly result from any advice, opinion, information, representation or omission, whether negligent or otherwise, contained in this report. EIMS does not accept any liability for any loss or damage, whether direct, indirect or consequential, arising out of circumstances beyond the control of EIMS, including the use and interpretation of this report by the client, its officials or their representatives or agents.

	Recommended/Agreed corrective action completion date[3]:			Recommended: 31/07/2026
3. Actual Corrective Actions				
Actual corrective action implemented:				
Corrective action photographic record:				
Additional Preventative measures?				
NC Closed out:	Yes[4]☐	No☒	ECO Signature:	
			Date:	
			Client Rep Name and Signature:	
			Date:	
			Contractor Rep Name and Signature:	
			Date:	

[3] Should the ECO suggested correction action deadline not be reasonable or feasible the objecting party should advise the ECO in writing of such together with reasons and an alternate suggestion within 24hrs of the issuing of the NCR.

[4] In the event that post closure of this NCR, there are any additional latent and/or residual impacts resulting from this NCR, there may be further requirements for further management, mitigation, remedial or corrective measures.