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JUNE 2024 MONTHLY ECO AUDIT REPORT

IMPOFU CLUSTER WIND ENERGY FACILITY

DEA Reference Numbers:

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



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List of Abbreviations

Abbreviation	Item
DEA	Department of Environmental Affairs
DFFE	Department of Forestry, Fisheries and the Environment
EA	Environmental Authorisation
ECO	Environmental Control Officer
EO	Environmental Officer
EGP	Enel Green Power
EIMS	Environmental Impact Management Services (Pty) Ltd
EMPr	Environmental Management Programme
GA	General Authorisation
I&AP	Interested and Affected Party
NC	Non-Compliance

Abbreviation	Item
NCR	Non-Compliance Report
NMBMM	Nelson Mandela Bay Metropolitan Municipality
OHL	Overhead Line
MPRDA	Mineral and Petroleum Resources Development Act
WF	Wind Farm
WTG	Wind Turbine Generator

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 June 2024 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 Lance Blaine
Head Office Physical Address	2017/118197/07
Head Office Telephone Number	Unit 2B, Mainstream Centre, Cape Town, 7806
Head Office Fax Number	(021) 790 1392
Head Office Contact Person	Mr Lance Blaine
Operations Physical Address	Impofu Wind Farm Cluster
Operations Telephone number	079 434 9559
Operations Contact Person	Mr Zishaan Khan

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 4.1 for additional permits.

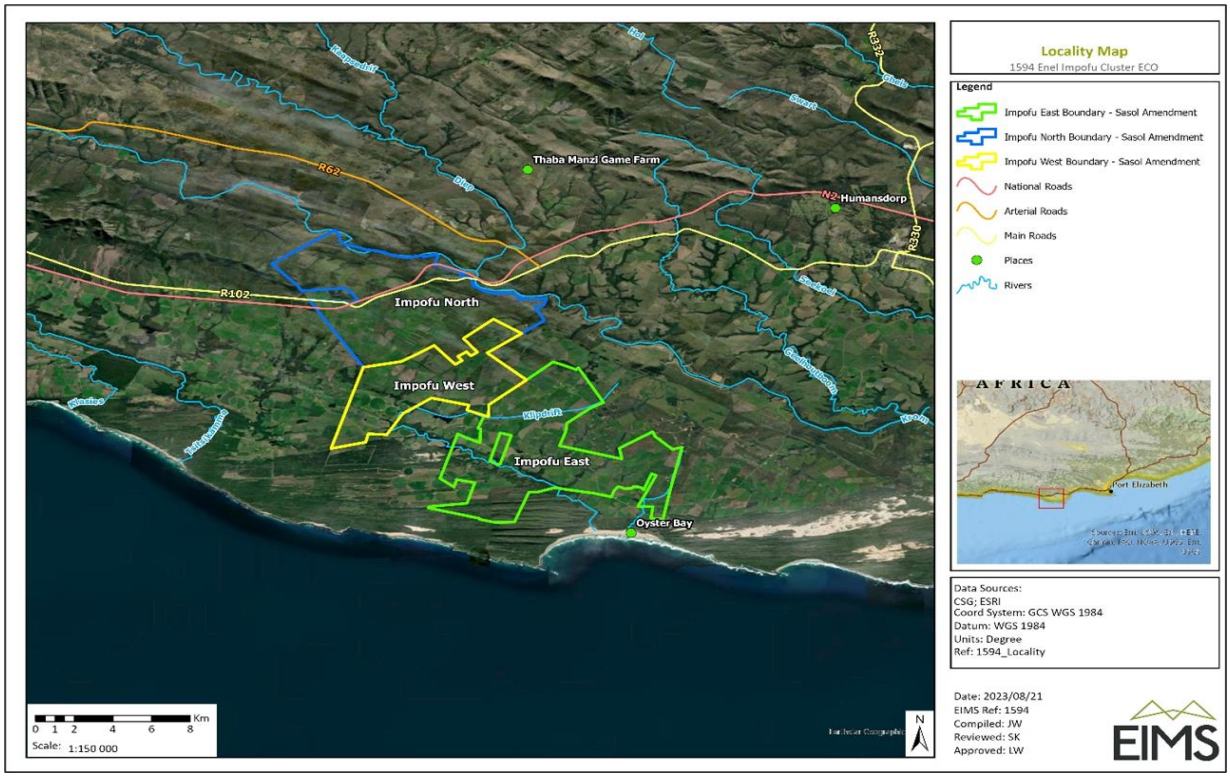


Figure 1: Impofu Cluster boundaries

The112.1MW Impofu North Wind Farm will comprise of the following infrastructure:

- Turbines: Up to 19 turbines with a hub height of 120m, and rotor diameter of 163m, the minimum tip height (ground clearance) will be at least 38.5m:
- 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 of 120m, and rotor diameter of 163m, the minimum tip height (ground clearance) will be at least 38.5m:
- 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 of 120m, and rotor diameter of 163m, the minimum tip height (ground clearance) will be at least 38.5m:
- 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 two (2) contractors, Power Construction (appointed for civil works) and Brand Besamandla (appointed for electrical works). Power construction has appointed subcontractors to undertake some works, i.e. Kouga Fencing to do fencing, Summertree Civils for stormwater installation, Wake Field for steel fixing, Dakar Concrete for concrete pouring and Scribante supplies concrete. Main activities are on Impofu North and West then only construction of substation on East. The audit was conducted on the 19th of June 2024. Activities currently ongoing on site include Buffer Yard gravel processing, WTG rock removal, bulk earthworks on roads, relocation of existing services, i.e. fences and water troughs, stormwater installations, trapezoidal drains, clearing and grabbing as well as stripping of topsoil, WTG excavations, concrete works, rebar fixing, shuttering foundation works, verge clearing and mulching on DRE roads. Substation Bulk earthworks undertaken at Impofu East, West and North. Blasting undertaken at West substation on the 10th of June 2024 and Powfontein substation on the 18th of June 2024. Dust suppression is done when required.



Figure 2: Shuttering foundation works and rebar setting at WTG N2



Figure 3: Bulk earthworks on road 1 in Impofu North.



Figure 4: Pumping water from an excavation for dust suppression in WTG W4.



Figure 5: Wetland crossing at Impofu West road 10 (RW10) complete.



Figure 6: Blasting undertaken at Impofu West Powfontein substation on the 18th of June 2024.



Figure 7: Dust monitoring bucket near road 1 at Impofu North (RN1).



Figure 8: Gravel processing in the buffer yard.

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 Bulelwa Runeyi from EIMS.

2.1 EXPERTISE OF THE ECO

Bulelwa Runeyi has a National Diploma in Environmental Management with an excess of 10 years' experience in the Environmental Management field. She has completed a short course in Environmental Law with the University of Pretoria. She is a registered Environmental Assessment Practitioner (EAP) with the Environmental Assessment Practitioners Association of South Africa (EAPASA). After graduating, Bulelwa worked in a private company as an Environmental Officer where she gained experience in environmental education and conducting environmental awareness campaigns in schools and communities. She further acquired training in stakeholder engagements and peer coaching on environmental conservation. She also has experience in conducting Environmental Impact Assessments, Water Use License Applications, Public Participation Coordination, development of Environmental Management Programmes, and conducting independent environmental compliance audits.

2.2 DECLARATION OF INDEPENDENCE

*I, **Bulelwa Runeyi**, declare that –*

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

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

Signature: 

3 SCOPE, PURPOSE AND OBJECTIVE OF THE AUDIT

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

- report on –
  - the level of compliance with the conditions of the EA and the EMPr, and where applicable, the closure plan; and



- the extent to which the avoidance, management and mitigation measures provided for in the EMPr, and where applicable, the closure plan achieves the objectives and outcomes of the EMPr, and closure plan.

- identify and assess any new impacts and risks as a result of undertaking the activity.
- evaluate the effectiveness of the EMPr, and where applicable, the closure plan.
- identify shortcomings in the EMPr, and where applicable, the closure plan; and
- identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr, and where applicable, the closure plan.

4 AUDIT METHODOLOGY

4.1 PROCEDURE FOR THE AUDIT

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

During the audit, the ECO requested the following information:

- EA, EMPr, permits, licences, all other relevant authorisations and approvals.
- Environmental management monitoring such as water use registers, test analysis, noise and dust monitoring (if any).
- Pre-Construction requirements such as site establishment requirements/method statements and layout plan.
- Training requirements such as inductions, and awareness training registers.
- Incident reports and incident registers.
- Compliant registers.
- Waste management manifests, and
- Contractor's EO weekly/ weekly site inspection reports.

4.2 EVALUATION CRITERIA USED DURING THE AUDIT

The evaluation criteria for compliance scoring was based on a pre-determined scoring system. Each condition of the EA and EMPr was weighted equally in order to determine a compliance score. The scoring criteria used during the audit are as follows:

- Full-Compliance: Indicating that the condition was fully complied with and provided with a compliance score of 4.

- Partial-Compliance: Indicating that the condition has not been fully complied with and that additional measures are required to obtain full compliance. Partial compliances were provided with a compliance score of 2.

- Non-Compliance: Indicting that the condition has not been complied with and provided with a compliance score of 0.

- Not Applicable (N/A): Indicating that the condition is not currently applicable. Not applicable conditions were removed from the total number of conditions from which the compliance score was calculated during this reporting period.

4.3 DOCUMENTATION REVIEW

Initial documentation was obtained and reviewed in preparation for the assessment monitoring. Checklists were prepared based on the requirements of the EAs, EMPrs and the GA. Most relevant legal documents were available upon request during the ECO environmental monthly audit from the client and the appointed contractors, including the following:

License/Permit Holder: Red Cap Impofu (Pty) Ltd.

- The 2nd amendment of the EA for the 182MW Impofu North Wind Energy Facility (reference Number: 14/12/16/3/3/2/1102/AM2) was approved by DFFE on the 6th of December 2022. This was read together with the EA dated 25 September 2019 and the 1st amendment dated 11 November 2020.
- The 2nd amendment of the EA for the 168MW Impofu West Wind Energy Facility (reference Number: 14/12/16/3/3/2/1103/AM2) was approved by DFFE on the 6th of December 2022. This was read together with the EA dated 23 September 2019 and the 1st amendment dated 16 November 2020.
- The 2nd amendment of the EA for the 189MW Impofu East Wind Energy Facility (reference Number: 14/12/16/3/3/2/1104/AM2) was approved by DFFE on the 6th of December 2022. This was read together with the EA dated 25 September 2019 and the 1st amendment dated 16 November 2020.
- 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 Consent for the Impofu North Wind Farm was received on the 16th of September 2019 with no expiry date.

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. Training registers are kept in the site file. Environmental Officer weekly monitoring reports are available and up to date.

Relevant environmental method statements were available and reviewed by the ECO as required by the EMPr section B section 3.1.2. Registers were available in the contractors site file such as the updated incident register; a complaint register; updated water register; an updated training register; as well as the updated waste register.

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. 6 m^3 of general waste was collected from site and disposed at the landfill site on the 19th of June 2024. Waste disposal certificates are kept in the environmental file for records. The ECO advised that the safe disposal certificates be filed for auditing and record retention purposes.

Hazardous Waste

Power Construction is planning to appoint an independent service provider to collect, transport and dispose of hazardous waste at a registered hazardous landfill facility. The hazardous waste bins are placed on a concrete slab at the site camp. The contractor was advised to avoid mixing of waste. There was no hazardous waste removed and disposed by Power during this reporting period. The ECO advised that all hazardous waste safe disposal certificates and/or waste manifests must be acquired for hazardous waste removed from site and records must be kept for audit purposes.

Sewage Waste

Power Construction (Power) 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. Power appointed another service provider for mobile flushable ablution facilities (Portable toilets) at the site camp. The flushable toilets are serviced by Specialized Disinfecting Services (SDS). SDS dispose their effluent at Jeffreys Bay Wastewater Treatment Works under Kouga Local Municipality (Licence number: 12/K90F/EF/4333). Bidvest serviced toilets on the 11th and 14th of June 2024 and collected 1 280 L of effluent for disposal. SDS pumped 10 000 L of sewage from the conservancy tank on the 18th of June 2024. Chemical toiles on site are secured and anchored to the ground, to prevent them from being blown over. Waste disposal certificates are available in the contractors environmental file.

Water Consumption

Power started abstracting water from Steynburg and Biggs farm boreholes on 06th of May 2024, they have abstracted 3117 m^3 at Steynburg farm and 1010 m^3 at Biggs farm during this reporting period. Water from the boreholes is used for dust suppression of access roads as well as other work areas and to flush toilets at the site camp. The water is also used for dilution of the bio-security cleaning agent for the Foot and Mouth Disease on farms. At the site camp, there is a filtration system for consumption which is not in use yet (awaiting water use license) (Refer to Figure 9 below).

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 will be 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 monitors water use. Registered water uses are section 21 (c, i, and g), for North there are 41 water uses, West with 50, and East with 46.



Figure 9: Filtration system installed at the site camp.

4.4 SITE ASSESSMENT

Construction activities currently underway includes buffer yard gravel processing, WTG rock removal, bulk earthworks on roads, relocation of existing services (i.e. fences and water troughs), stormwater installations, trapezoidal drains, clearing and grabbing as well as stripping of topsoil, WTG excavations, concrete works, rebar fixing, shuttering foundation works, verge clearing and mulching on road DR175. Substation Bulk earthworks undertaken at Impofu East, West and North. Blasting undertaken at West substation on the 10th of June 2024 and Powfontein substation on the 18th of June 2024. Dust suppression is done when required.

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, 5.2, 5.3 and 5.4 respectively.

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.

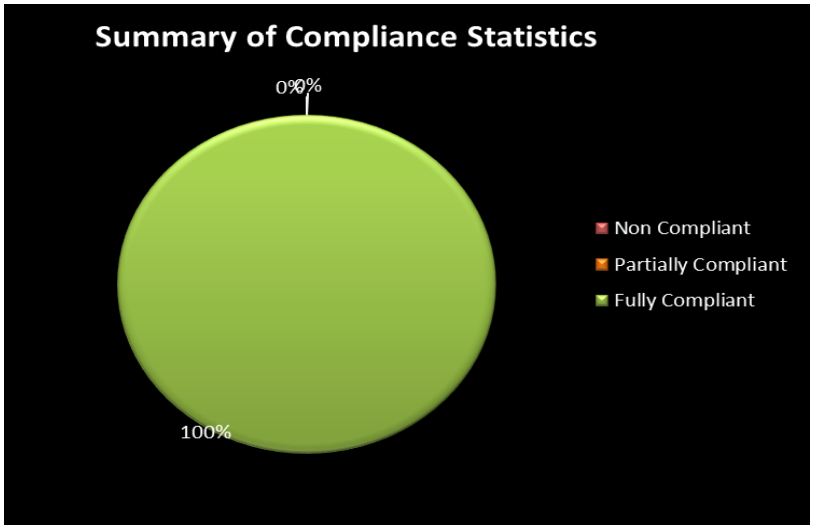


Figure 10: Summary of compliance with the requirements of the EA.

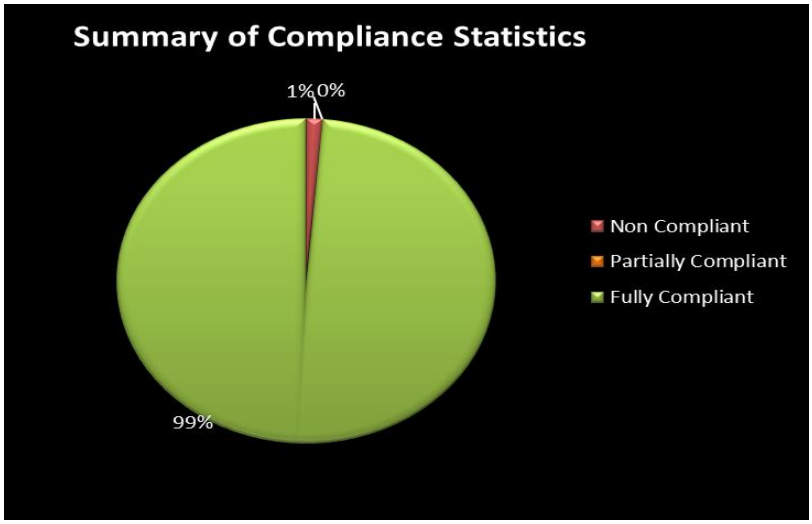


Figure 11: Summary of compliance with the requirements of the EMPr.

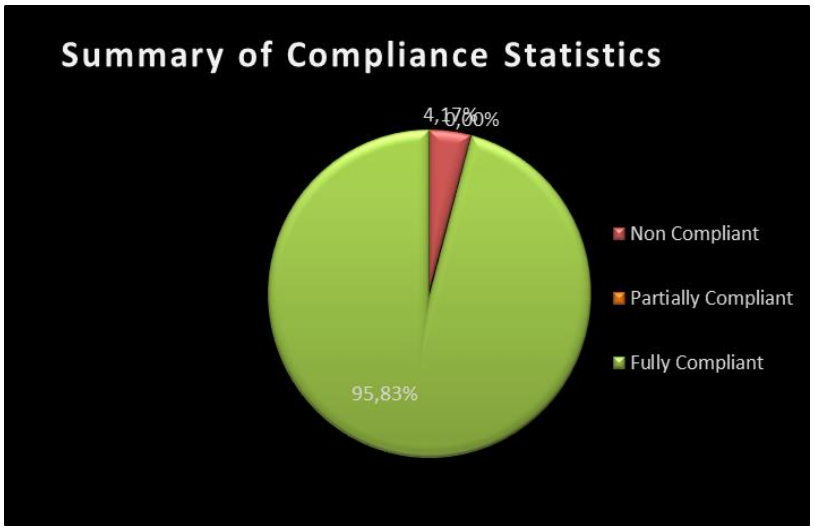


Figure 12: Summary of compliance with the requirements of the Water Use Authorisations (GA).

5.2 GOOD COMPLIANCES

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

Location	Category	Responsible Party	Description	Photo Reference
Site camp	Sanitation	Power Construction	Servicing of conservancy tanks observed at the main camp.	 Figure 13: Servicing of conservancy tanks observed at the main camp.
RW9	Pollution prevention	Power Construction	Wacker and petrol placed on a drip tray to avoid soil contamination.	 Figure 14: Wacker and petrol placed on a drp tray.

Location	Category	Responsible Party	Description	Photo Reference
WTG N2	Storage and laydown areas	Power Construction	Steel placed on wood to minimise rust from penetrating ground and damage to the underlying vegetation.	 Figure 15: Steel placed on wood to minimise rust from penetrating ground and damage to the underlying vegetation.

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5.3 AREAS OF CONCERN

No concerns were raised during this reporting period. Areas of concern have the potential to become non-compliances or incidents if not adequately considered or addressed, where required.

5.4 NON-COMPLIANCES

Three (3) new non-compliances were noted 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
005.	EMPr 5.3.4.2	Should portable/chemical toilets be used then these shall be used and maintained in such a way that they do not cause water or other pollution: •No toilet facilities shall be located closer than 50 m to any water body •Toilets shall be adequately secured to the ground to prevent them from toppling due to wind or any other cause. •Adequate toilet paper, and hand sanitiser or soap shall be provided. •Toilets shall be serviced regularly (as per the service providers recommendations) and care shall be taken to ensure no spillage occurs when the toilets are cleaned or emptied and that the waste contents and grey water are	Chemical toilet at WTG N2 not adequately fixed to the ground which resulted in it falling.	Contractor should make sure that all chemical toilets are adequately fixed to the ground to prevent from being blown by wind.	**Open/ uncorrected** Although the toilet was picked up, it was not fixed on the ground.	 Figure 16: Chemical toilet at WTG N2 blown by wind.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		properly stored before removal from site. •Certificates of service/disposal by appropriate service providers or at appropriately licensed facilities shall be retained for submission to the ECO. •Discharge of waste from toilets into the environment (e.g. burial of ablution waste from toilets) is strictly prohibited.				
006.	EMPr 5.3.15.9	Should the generation of hazardous waste be anticipated during the site activities, then suitable collection and storage facilities shall be planned, and an area of the Contractor's camp designated for this purpose in accordance with the relevant legislation. •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 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	Hazardous waste drum lid could not close properly because there was a broken drip tray inside.	Contractor should break the drip tray into smaller pieces in order for the drum to close properly.	**Open/ uncorrected** Hazardous waste drum lid could not close properly because there was a broken drip tray inside.	 Figure 17: Hazardous waste drum not closed properly.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		storage tanks/bowsers (110% statutory requirement plus allowance for rainfall). •Access to waste storage areas shall be restricted, and the areas secured with requisite warning signage. •Rainwater that collects in bunded areas shall be promptly removed and dealt with as water containing waste.				
007.	EMPr 5.3.16.1	All reasonable measures shall be taken to limit erosion. •The most effective way to control erosion is to retain the existing vegetation for as long as possible. Hence, site clearance shall be undertaken in a phased approach wherever possible such that the extent of exposed soils shall be limited to areas of the current construction phase. •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	Erosion observed at the site camp during this reporting period.	Contractor should fill the erosion gully with stones and compact the area before the erosion spread.	**Open/ Uncorrected** Erosion observed at the site camp during this reporting period.	 Figure 18: Erosion observed at the site camp.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		areas restored to a proper condition. •Stabilisation of cleared areas to prevent and control erosion shall be pro-actively managed by the Contractor. •Any relevant requirements stipulated by a Water Use Authorisation must also be implemented, if applicable.				

5.5 NON-COMPLIANCE REPORTS

Non-Compliance Reports (NCRs) are issued to the project or relevant contractor if the recorded NCs are not addressed in the agreed timeframes. Zero (0) NCRs were issued during the current reporting period.

5.6 INCIDENTS

No new incidents reported during this reporting period. The contractor EO maintain the records of all incidents noted and reported on site in the form of a register log. The contractor is advised to report all environmental incidents to the ECO for monitoring of requisite remedial action undertaken by the contractor following an incident.

5.7 COMPLAINTS

No complaint was reported to the ECO during the reporting period. The contractor's EM mentioned that there were four (4) informal complaints that were resolved promptly. It should be noted that all complaints should be reported to the ECO as soon as they occur.

5.8 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. The ECO recorded one (1) non-compliance during the previous audit.

Table 4: Environmental Non-Compliances raised during the previous reporting period.

Status Description	Colour Scale
Closed-Out/ Corrected	
Work in Progress (WIP)	
Open/ Uncorrected	

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
002.	EA 06	The holder of an environmental authorisation must apply for an amendment of the environmental authorisation with the competent authority for any alienation, transfer or change of ownership rights in the property on which the activity is to take place.	It was noted that although Enel Green Power has taken over the EA and is now in the development phase of the project the EA is still states Red Cap as the Holder.	The applicant is advised to apply for amendment of the EA holder.	**Closed** It was reported that although works are managed by Enel, RedCap remains the holder of the EA.	N/A
003.	GA 7(d)	Upon change of ownership the successor in the title must notify the region or CMA within 3 months to have the existing entitlement registered in his/her name.	GAs are still under Red Cap ownership although Enel Green Power (EGP) has taken over the GAs in the	EGP is advised to notify the relevant authority about the change of ownership to have the existing entitlement registered in their name.	**Closed** It was reported that although works are managed by Enel,	N/A



NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
			development phase of the project.		RedCap remains the holder of the EA.	
004.	GA 8(b)	Water users are further required to register on www.dws.goc.za/dir_ws/wsmenu and upload all documents applicable to the full project lifecycle including baseline water quality data and monthly monitoring data against baseline as required in terms of paragraph (5) on the departmental Integrated Regulatory Information System.	Water user has not registered on the DWS website.	The water user is advised to register on the DWS website.	**Open/ uncorrected** Water user has not registered on the DWS website.	N/A

6 CONCLUSION

The contractor is 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	**0**	**2**	**0**
Non-compliances	**3**	**7**	**4**
Non-compliance Reports	**0**	**0**	**0**
Incidents	**0**	**4**	**0**
Complaints	**0**	**4**	**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.