EIMS | ENVIRONMENTAL IMPACT MANAGEMENT SERVICES

T 011 789 7170 E info@eims.co.za W www.eims.co.za

OCTOBER 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



DOCUMENT DETAILS

EIMS REFERENCE: 1594

DOCUMENT TITLE: October 2024 Monthly ECO Audit Report

DOCUMENT CONTROL

	NAME	SIGNATURE	DATE
COMPILED:	Bulelwa Runeyi	Sent Electronically	2024/11/06
CHECKED:	Sikhumbuzo Mahlangu	Sent Electronically	2024/11/06
AUTHORIZED:	Liam Whitlow	Sent Electronically	2024/11/06

REVISION AND AMENDMENTS

REVISION DATE:	REV #	DESCRIPTION
2024/11/08	ORIGINAL DOCUMENT	Draft ECO Report
2024/11/11	REVISION1	Final ECO Report

This document contains information proprietary to Environmental Impact Management Services (Pty) Ltd. and as such should be treated as confidential unless specifically identified as a public document by law. The document may not be copied, reproduced, or used for any manner without prior written consent from EIMS. Copyright is specifically reserved.

Table of Contents

1 INTRODUCTION 4
1.1 DETAILS OF THE HOLDER 4
1.2 BRIEF PROJECT DESCRIPTION 5
1.3 PROJECT PROGRESS 7
2 DETAILS OF THE ECO 8
2.1 EXPERTISE OF THE ECO 8
2.2 DECLARATION OF INDEPENDENCE 8
3 SCOPE, PURPOSE AND OBJECTIVE OF THE AUDIT 8
4 AUDIT METHODOLOGY 9
4.1 PROCEDURE FOR THE AUDIT 9
4.2 EVALUATION CRITERIA USED DURING THE AUDIT 9
4.3 DOCUMENTATION REVIEW 10
4.4 SITE ASSESSMENT 12
5 RESULTS OF THE AUDIT / LEGAL COMPLIANCE 15
5.1 COMPLIANCE SUMMARY 15
5.2 GOOD COMPLIANCES 17
5.3 AREAS OF CONCERN 19
5.4 NON-COMPLIANCES 20
5.5 NON-COMPLIANCE REPORTS 25
5.6 INCIDENTS 25
5.7 COMPLAINTS 25
5.8 STATUS OF NON-COMPLIANCES REPORTED DURING PREVIOUS REPORTING PERIODS 26
6 CONCLUSION 29
7 ASSUMPTIONS AND LIMITATIONS 29

List of Tables

Table 1: Details of the holder. 4
Table 2: List of Good Compliances recorded during this reporting period. 17
Table 3: Environmental Non-Compliances raised during the current reporting period. 20
Table 4: Environmental Non-Compliances raised during the previous reporting period. 26
Table 5: Summary of observations noted. 29

Figures

Figure 1: Impofu Cluster boundaries 6
Figure 2: Water catchpit installation at RW8. 12

Figure 3: WTG N2 backfilled. 13
Figure 4: Foundation cast main pour at WTG N10. 13
Figure 5: Concrete culverts bridge being re-designed to increase spillway capacity to farmer's dam at RW5.... 14
Figure 6: Topsoil reinstated at road North (RN) 19. 14
Figure 7: Importing bedding sand for underground cables at RN19. 14
Figure 8: Cement damaged by cows at WTG N16. 14
Figure 9: MV cables trench excavation at RN11 14
Figure 10: Excavation, backfilling and compaction at Powfontein substation. 14
Figure 11: Road maintenance at Bloekomlan road. 15
Figure 12: Drip tray not placed under parked TLB at North substation. 15
Figure 13: Summary of compliance with the requirements of the EA (Power Construction). 15
Figure 14: Summary of compliance with the requirements of the EMPr (Power Construction). 16
Figure 15: Summary of compliance with the requirements of the EMPr (Brand Besamandla). 16
Figure 16: Summary of compliance with the requirements of the Water Use Authorisations (GA). 16
Figure 17: Waste management area neat and clean at the main camp. 17
Figure 18: Generators placed on a drip tray at WTG N10. 17
Figure 19: Good housekeeping observed at North substation. 18
Figure 20: Hazardous Chemical Substances stored at the site camp exceeds bund capacity. 20
Figure 21: Subsoil overlaps on topsoil and spread to farmer's field at WTG W10. 21
Figure 22: Drip tray not placed under parked diesel bowser at the site camp. 23
Figure 23: General waste bin without a lid at WTG N10. 23
Figure 24: Box with old gloves placed on top of a hazardous waste bin. 24
Figure 25: Mixing of waste avoided at WTG N16. 28

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

Abbreviation	Item
EIMS	Environmental 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
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 October 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.

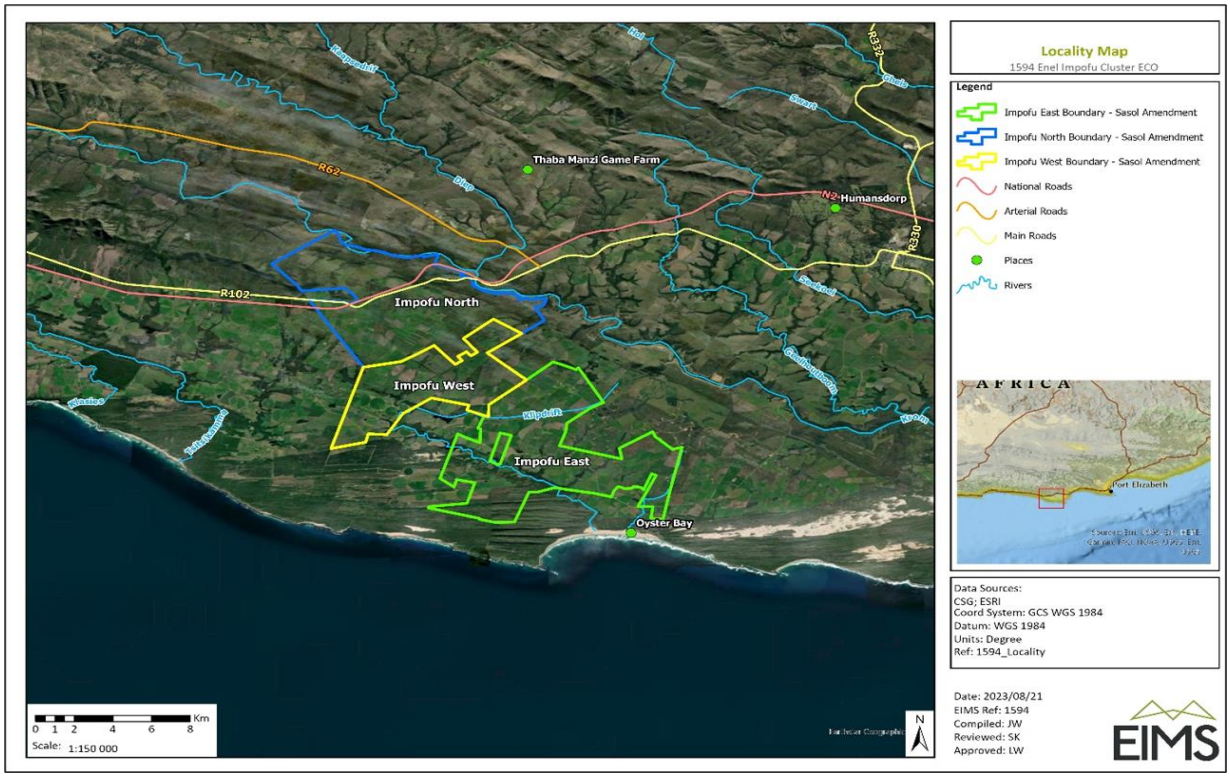


Figure 1: Impofu Cluster boundaries

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 and Tsitsikamma Works Projects to do fencing, Summertree Civils for stormwater installation, Wake Field for steel fixing, Dakar Concrete for concrete pouring, Bay Projects for upgrading and bush clearing on road reserves, Abnormal Solution for upgrading N2 roads, and Martinash Trading for cleaning turbine bases. Scribante appointed to supply concrete.

Construction progress meetings are held daily in the morning. During progress meetings, environmental issues are also discussed. HSE meetings are held once monthly. Works underway includes:

- WTG foundation
- Crane pads
- Access roads
- North substation
- East substation
- Powfontein substation
- West substation
- MV reticulation, and

- Construction of internal Overhead Lines

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.
- Water Use Authorisation (GA) for Section 21 (a, c and i) was approved on the 26th of January 2024 for the Impofu West Wind Farm.
- Water Use Authorisation (GA) for Section 21 (a, c, and i) was approved on the 29th of July 2024 for the Impofu East Wind Farm.
- Exemption regarding pruning of Syderoxylon Inerme (White Milkwood) Tree (reference number: 20/8/5/1-RCIW) received from DFFE on the 18th of July 2024.
- Turbine blade painting approval on Impofu East and West Wind Farm from Civil Aviation Authority on the 06th of October 2024.

Monitoring documents and registers

The construction EMPr has been made part of the contract documentation with the Contractors appointed to construct the Impofu Wind Farms and associated infrastructure as required by condition 4.1.1.2 of the EMPr. Environmental training/induction is conducted by the EOs for site employees and management regarding the contents of the EA and the EMPr. 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. A total of 30 m^3 of general waste was collected from site and disposed at the landfill site on the 19th, and 23rd of September 2024 as well as 04th, 09th, and 14th of October 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 has appointed independent service provider, Extreme Projects to collect, transport and dispose of hazardous waste at a registered hazardous landfill facility. Extreme Projects (registration number: 2011/05) transports hazardous waste to Aloes II Waste Treatment Facilities (Licence Number: 12/9/11/L624/1). During this reporting period no hazardous waste was disposed. 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 Sewage Works (Pty) Ltd (SW). SW dispose their effluent at Jeffreys Bay Wastewater Treatment Works under Kouga Local Municipality (Licence number: 12/K90F/EF/4333). During this reporting period, Bidvest collected 6 700 Litres of effluent for disposal from servicing toilets on the 17th, 18th, 24th, and 25th of September 2024 as well as 01st, 03rd, 08th, 09th, and 11th of October 2024. SW pumped and disposed a total of 60 000 L of sewage from the conservancy tank on the 17th, 20th, and 29th of September 2024 as well as 03rd, 08th, and 14th of October 2024 (10 000L on each day). 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 contractor's environmental file.

Health Care Risk Waste

Ubabalo Ambulance who has been appointed by Power Construction for medical incidents on site has appointed a service provider for collection, transport and disposal of Health Care Risk Waste (HCRW), Compass Medical Waste Services Pty (Ltd) (Compass). Compass is registered as HCRW treatment Facility (DFFE licence number: 12/9/11/L221109112152/1/R) and registered as a transporter of medical waste with Buffalo City Metropolitan Municipality (Registration number: BCMM-13/hcrw/t/02). A total of 0.14 m^3 of HCRW was collected from Power site camp on the 10th of October 2024 and disposed at the treatment plant on the 11th of October 2024. Waste disposal certificate is available in the contractor's environmental file.

Water Consumption

Power currently uses water abstracted from Steynburg, Biggs, and Cilliers farm boreholes. Water readings taken on the 14th of October 2024 show that they have abstracted 10 048 m^3 at Steynburg farm (Impofu West), 3 693 m^3 at Biggs farm (Impofu North), and 2 012 m^3 at Cilliers farm (Impofu West) 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, filtration system for consumption is currently in use and certificate of analysis for the water was received on 26 July 2024 from Talbot Laboratories (Pty) Ltd. The parameters tested on the sample submitted (021321/24 and 021322/24) conform to the SANS 241:2015 requirements for drinking water.

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 2: Water catchpit installation at RW8.

4.4 SITE ASSESSMENT

The audit was conducted on the 14th and 15th of October 2024. Activities for this reporting period included cleaning bases and installing ducts, dewatering excavations, mulching of trees on the road reserve and maintenance on District Road (DR1765 and MN50032), WTG rock removal, bulk earthworks and processing internal roads as well as Security Bellmouths, load and haul of G5 material, stormwater installation, concrete blinding and recess pouring, foundation cast main pour at WTG N16, N15, N18, N1, N9, W2, and N10, steel fixing and shutter installation, relocation of existing services, i.e. fences and water troughs, WTG recess and duct trenching, WTG excavations, rock breaking in WTGs. WTG backfill at N17 and N2, trimming of trees and drainage construction on internal roads, foundation inner and outer shutter installations and rigid Inclusions at WTG W16 were also noted.

Blasting was undertaken at WTG E10, road East (RE) 19 and RE20 on the 23rd of September 2024. Brand Besamandla currently works in all substations, excavating for OHL pylons, and MV cable installations. Activities underway include the following:

- **West Substation**:
    - Earth matt installation on the platform.
    - Backfilling and compaction of the platform trenches.
- **Powfontein Substations**:
    - Site establishment.
    - Setting out for earth matt installation.
    - Trench excavation for the earth matt installation.
    - Backfilling and compaction of the platform trenches.
    - Brazing.
- **North Substation**:
    - Bulk earth backfilling work for G5 layer.
- **East Substation**:
    - Bulk earth backfilling work for G5 layer.
- **Internal Overhead Lines**
    - Foundation works: Excavations.
- **MV Cable installation**
    - Clear and grab.
    - Trench excavations.



Figure 3: WTG N2 backfilled.



Figure 4: Foundation cast main pour at WTG N10.



Figure 5: Concrete culverts bridge being re-designed to increase spillway capacity to farmer's dam at RW5.



Figure 6: Topsoil reinstated at road North (RN) 19.



Figure 7: Importing bedding sand for underground cables at RN19.



Figure 8: Cement damaged by cows at WTG N16.



Figure 9: MV cables trench excavation at RN11.



Figure 10: Excavation, backfilling and compaction at Powfontein substation.



Figure 11: Road maintenance at Bloekomlaan road.



Figure 12: Drip tray not placed under parked TLB at North substation.

5 RESULTS OF THE AUDIT / LEGAL COMPLIANCE

EIMS have been appointed to undertake legal compliance audits in terms of the EA, GA and EMPr of the Impofu Wind Farms and associated infrastructure. The results of the monthly ECO Audit are provided in this section of the report. The compliance summary, areas of good compliance, areas of concern and areas of non-compliance are provided in sections 5.1, 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.

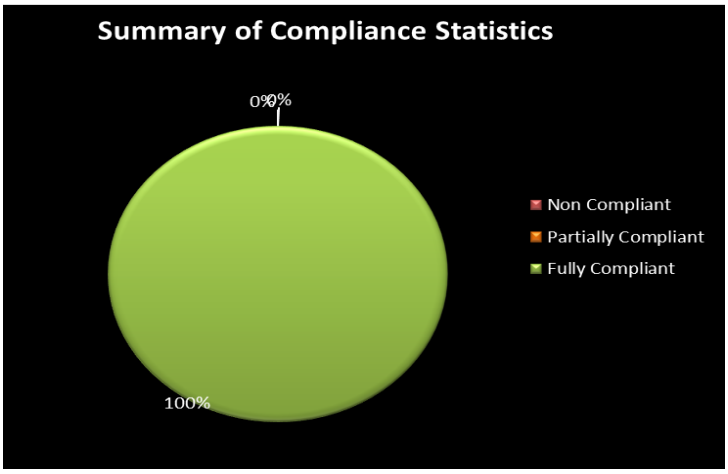


Figure 13: Summary of compliance with the requirements of the EA (Power Construction).

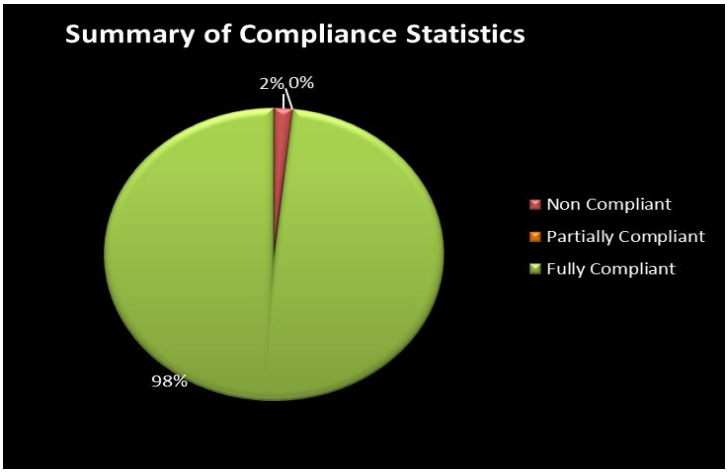


Figure 14: Summary of compliance with the requirements of the EMPr (Power Construction).

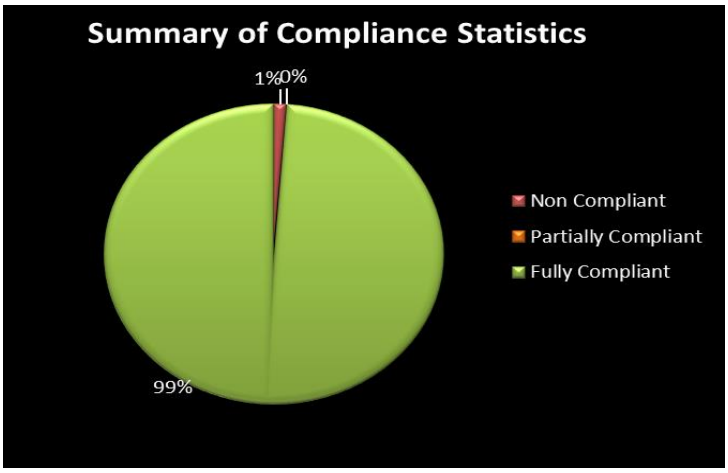


Figure 15: Summary of compliance with the requirements of the EMPr (Brand Besamandla).

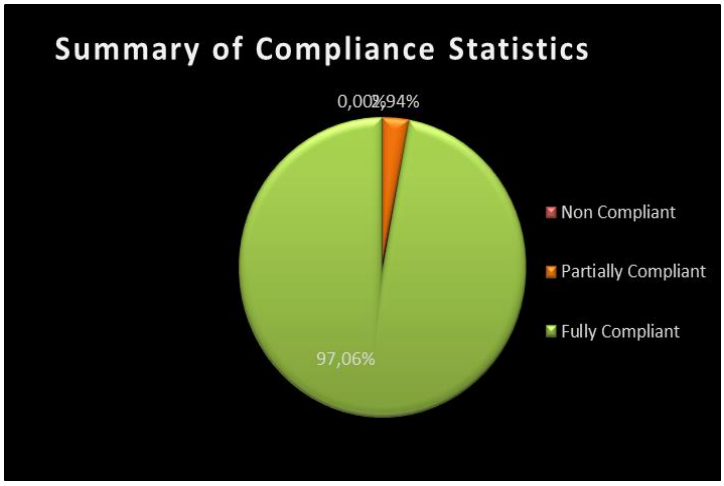


Figure 16: Summary of compliance with the requirements of the Water Use Authorisations (GA).

5.2 GOOD COMPLIANCES

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

Location	Category	Responsible Party	Description	Photo Reference
Main site camp at Impofu West	Housekeeping	Power Construction	Waste management area is kept clean and neat at the main camp.	 Figure 17: Waste management area neat and clean at the main camp.
WTG N10	Pollution prevention	Power Construction	Generators were placed on a drip tray at WTG N10.	 Figure 18: Generators placed on a drip tray at WTG N10.

Location	Category	Responsible Party	Description	Photo Reference
North substation	Housekeeping	Brand Besamandla	Good housekeeping observed at North substation.	 Figure 19: Good housekeeping observed at North substation.

.

5.3 AREAS OF CONCERN

Two (2) new concerns were raised during this reporting period. At North substation, drip tray was not placed under parked TLB which may lead to ground pollution in case of accidental spillage. At West substation, subsoil was stockpiled on top of topsoil. Areas of concern have the potential to become non-compliances or incidents if not adequately considered or addressed, where required.

5.4 NON-COMPLIANCES

Five (5) new non-compliances were noted during this reporting period. Four (4) were raised for Power Construction and one (1) for Brand Besamandla. 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
019	EMPr 5.3.9.3 **For Power Construction**	"If potentially Hazardous Chemical Substances are to be stored on site, then: •Hazardous Chemical Substances shall be stored in appropriate containers which are clearly labelled and sealed. •Hazardous Chemical Substance containers shall be situated on a smooth impermeable surface (concrete or 250 micrometre (µm) plastic (plastic must have a minimum of a 5 cm layer of sand on top to prevent damage and perishing)) within an earth bund. The impermeable lining shall extend to the crest of the bund and the volume inside the bund shall be 120% of the total capacity of all the storage tanks/bowsers (110%	Hazardous Chemical Substances stored at the site camp exceeds bund capacity.	Hazardous chemical substances stored in a bund should be 120% of the total capacity of all the storage containers to avoid over flow in case of any accidental spillage.	**Open/ Uncorrected** The contractor has to increase bund capacity.	 Figure 20: Hazardous Chemical Substances stored at the site camp exceeds bund capacity.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		statutory requirement plus allowance for rainfall). •Access to Hazardous Chemical Substance storage areas shall be restricted, and the areas secured with requisite warning/safety signage conforming to the requirement of SANS 1186 on display. •Disposal of these substances shall be in accordance with Section 0. •Rainwater that collects in bunded areas shall be promptly removed and dealt with as water containing waste. "				
020	EMPr 5.3.11.7 **For Power Construction**	"Stockpiled material (e.g. topsoil, soil, subsoil, and rocky material) shall be stable and well secured to avoid collapse and possible injury to site workers. Where required, appropriate precautions shall be taken to limit the erosion and compaction of stockpiles: •Stockpiled material shall not exceed 2 m in height (note: stockpiled topsoil shall be restricted to 1.5 m in height to prevent compaction). •Stockpiled material shall be placed to occupy the minimum width compatible with the natural angle	Subsoil stockpile at WTG W10, RE3, RE8 overlapped on topsoil and at WTG W10 spread to the farmer's land.	Topsoil should be stockpiled separately from subsoil at all times.	**Open/ Uncorrected** The contractor has to separate topsoil from subsoil and provide proof.	 Figure 21: Subsoil overlaps on topsoil and spread to farmer's field at WTG W10.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
		of repose of the material (simple dimensions to be provided by the ECO), and measures shall be taken to prevent the material from being spread over too wide a surface. •The stockpiles and stockpile areas shall be carefully managed to prevent cross-contamination of stockpile material and to guard against "stockpile creep" (topsoil stockpiles shall be clearly demarcated & be distinguishable from other material stockpiles). •Stockpiled material shall be kept clear of weeds and alien invasive vegetation growth by regular weeding, or herbicides if permitted (restrictions on herbicide use for topsoil stockpiles is to the discretion of the ECO). •If the stockpiles start to erode significantly or cause dust problems, they shall be covered with suitable erosion protection materials (e.g. hessian or geo-fabric). "				

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
021	EMPr 5.3.12.5 **For Power Construction**	"All vehicles and plant shall be provided with a suitably sized service pan/drip tray to be used to effectively trap fuel leaks in the event of a breakdown. • Drip trays shall be provided for all plant including stationary plant (such as compressors) and for "parked" plant (such as scrapers, loaders or any vehicle). "	Drip tray not placed under a parked diesel bowser at the site camp.	Drip tray should be placed under parked all parked plant and machinery to prevent accidental spillages.	**Open/ Uncorrected** The contractor has to provide drip trays for all parked plants and machinery.	 Figure 22: Drip tray not placed under parked diesel bowser at the site camp.
022	EMPr 5.3.15.7 **For Power Construction**	"Precautions shall be taken to avoid any waste from spreading on, or from, the site. •Scavenger and weatherproof bins with lids shall be provided at the contractor's camp, of sufficient number and capacity to store the general domestic waste produced on a daily basis. •Bins shall not be allowed to become overfull and shall be emptied regularly at the waste storages areas in the Contractor's camp, or directly transferred to an approved landfill. "	General waste bin at WTG N10 did not have a lid.	All waste bins should have a lid to prevent waste from being blown by wind.	**Open/ Uncorrected** The contractor has to provided waste bins with lids.	 Figure 23: General waste bin without a lid at WTG N10.

Non-Compliance (NC) #:	EA/EMPr / GA Ref.	Requirement	Description of NC	Recommendation	Status	Photographic Record
	Generic EMPr 5.8 **For Brand Besamandla**	The waste collection site must be maintained in a clean and orderly manner; Waste must be segregated into separate bins and clearly marked for each waste type for recycling and safe disposal;	Waste collection not maintained in an orderly manner as a box with old gloves was placed on top of a hazardous waste bin.	All waste should be placed inside a clearly marked bin.	**Open/ Uncorrected** The contractor has to place old gloves inside a general waste bin.	 Figure 24: Box with old gloves placed on top of a hazardous waste bin.

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

Two (2) new incidents were reported during this reporting period. Cows broke through fences at WTG N16 and damaged cement bags. The area was cleaned and the remaining cement in bags have been covered with plastic sheeting. A second incident was of a hydraulic oil spill occurred on road west (RW) 6 on Impofu West as a Dumper Truck was tipping gravel material and the hydraulic pipe burst. Hydraulic oil entered a stormwater channel which was dry. Spill kit was applied to absorb hydraulic oil and the v-drains were also effectively cleaned. OilCap was applied to the contaminated area. 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

One (1) new complaint was reported to the ECO during this reporting period. Dust nuisance was reported due to inadequate dust suppression on the District Roads (MN50032 and DRE1765) causing disturbance to landowners house close to Bellmouth of R102 and maize planted alongside MN50032. The Environmental Manager has provided training to Water Truck Operators on designated routes and priority areas. The Environmental Manager now oversees the District Road dust conditions and Water Truck Operator. 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 record three (3) 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
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 and/or engage the DWS with regards to the validity of the website.	**Work in Progress** EGP has sent an enquiry to the Department about the website because it does not work.	N/A
016	EMPr 5.3.9.14	"The Contractor shall submit a Method Statement to the Contract Manager and ECO for approval of the procedure for dealing with an accidental hydrocarbon spill: •Any single spill in excess of 200 shall be reported to the Department of Water and	Although an approved Method Statement was available, diesel spillages were not cleaned as per the	All spillages should be cleaned immediately after they occurred.	**Closed Out/ Corrected** The contractor has cleaned-up all spillages on site.	N/A

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
		Sanitation (DWS), and the Proponent. •The responsible operator shall have the required training to use the spill kit, or to contain the spill. •The activity causing the spill is to cease, and the spill is to be contained using a spill kit, sand berms, sandbags, sawdust, absorbent materials or similar. •Should any soil become contaminated by oil or fuel spills then the soil shall be removed. •Contaminated soil and material shall be stored in bags or sealed and labelled drums in the designated hazardous waste area of the site and disposed of in accordance with Section 0. •Any contaminated soil that cannot be removed is to be treated in situ as determined by the ECO. "	method statement.			

NC #:	EA/EMPr/ GA Ref.	Requirement	Description	Recommendation	Status	Photographic Record
017	EMPr 5.3.15.4	Designated facilities for builder's rubble, hazardous waste, and general waste as provided for in the Contractor's camp/s are to be used for the storage of the appropriate waste products that is weather proof and scavenger proof.	Improper storage of waste was observed on site where general waste was in a hazardous waste bin.	Waste should be stored appropriately in designated labelled waste bins.	**Closed Out/ Corrected** The contractor separates waste as the bins provided and mixing of waste is avoided.	 Figure 25: Mixing of waste avoided at WTG N16.
018	EMPr 5.7 **Brand Besamandla**	Water that has been contaminated with suspended solids, such as soils and silt, may be released into watercourses or water bodies only once all suspended solids have been removed from the water by settling out these solids in settlement ponds. The release of settled water back into the environment must be subject to the Project Manager's approval and support by the ECO.	Water contaminated with silt from an excavation observed being released to a nearby watercourse.	Water contaminated with silt should not be released to any watercourse and contractor should make sure that silt traps are used in all dewatering activities.	**Closed Out/ Corrected** The contractor communicated with supervisors regarding the importance of having silt traps during dewatering.	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	**2**	**9**	**2**
Non-compliances	**4**	**22**	**5**
Non-compliance Reports	**0**	**0**	**0**
Incidents	**2**	**7**	**0**
Complaints	**1**	**7**	**1**

7 ASSUMPTIONS AND LIMITATIONS

The following assumptions and limitations apply to this report:

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