

REGULATION 54 A(3) COMPLIANCE AUDIT REPORT

KHOBAB WIND FARM (RF) (PTY) LTD

*KHOBAB 140MW WIND ENERGY FACILITY ON THE REMAINDER OF THE FARM SOUS NO. 226
NEAR LOERIESFONTEIN, WITHIN THE HANTAM LOCAL MUNICIPALITY, NORTHERN CAPE
PROVINCE*



NOVEMBER 2024



Prepared by: In Clover Environmental Consulting (Pty) Ltd



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Regulation 54 (A3) Compliance Audit Report

DEA Reference Number: 12/12/20/2321/3/2A (Environmental Authorisation) Second Issue

1. INTRODUCTION

1.1 BACKGROUND TO THE REPORT

In Clover Environmental Consulting (Pty) Ltd was appointed by Khobab Wind Farm (RF) (Pty) Ltd to conduct the required compliance audit as required by the conditions of the Environmental Authorisation (EA) (29 October 2012), and the amended EA (17 July 2013), issued by the Department of Environmental Affairs (DEA, now Department of Forestry, Fisheries and the Environment (DFFE)).

1.2 ASSUMPTIONS, LIMITATIONS AND GAPS IN KNOWLEDGE

- The assumption is made that all information received from Mainstream, their appointed contractors / service providers, on which this audit report is based, is accurate and correct.
- Other than the regulatory requirement to issue the audit report to Interested and Affected parties, no public consultation was undertaken as part of this external audit. In the opinion of the auditor, such additional public participation was not required / warranted for the purposes of conducting the external audit.
- The auditor had access to all the information necessary to compile this audit report. There are no gaps in knowledge that would suggest any level of uncertainty in the findings of the auditor.

1.3 SCOPE, PURPOSES AND OBJECTIVES OF THE AUDIT

1.3.1 External compliance audit in terms of EA

The main objective of the compliance audit was to respond to the need for external compliance auditing as required in terms of the conditions of approval of the Amended EA. The proposed development must comply with the following approved authorisations:

| Document Title | Document Reference Number | Date of Issue |
|---|--------------------------------------|---------------|
| Amended Environmental Authorisation in terms of the NEMA EIA Regulations, 2014 (as amended) Issued by DFFE. | Reference Number: 12/12/20/2321/3/2A | 17 July 2013 |

1.3.2 Requirements of Appendix 7 of EIA Regulations (2014, as amended)

A further objective was to meet the requirements of Appendix 7 of the 2014 EIA Regulations, as amended, which contains the minimum content requirements for compliance audit reports. The

specific requirements are detailed in the table overleaf, together with a reference of where this is responded to in this audit report.

| Regulatory Ref # of Appendix 7 | Details of requirement | Report Reference | Section |
|---|--|---|----------------|
| 1 | The environmental audit report must provide for recommendations regarding the need to amend the EMPr, and where applicable, the closure plan. | Sections 4 and 6 | |
| 2 (a) (i) | Report on level of compliance with the conditions of the environmental authorisation and the EMPr, and where applicable, the closure plan. | Sections 3, 4 and 6 | |
| 2 (a) (ii) | Report on 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. | Sections 4 and 6 | |
| 2 (b) | Identify and assess any new impacts and risks as a result of undertaking the activity. | Section 6 | |
| 2 (c) | Evaluate the effectiveness of the EMPr, and where applicable, the closure plan. | Sections 4 and 6 | |
| 2 (d) | Identify shortcomings in the EMPr, and where applicable, the closure plan. | Sections 4 and 6 | |
| 2 (e) | Identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr, and where applicable, the closure plan. | Sections 4 and 6 | |
| 3 (1) a | An environmental audit report prepared in terms of these Regulations must contain details of the— (i) independent person who prepared the environmental audit report; and (ii) expertise of the independent person that compiled the environmental audit report | Section 2 | |
| 3 (1) b | a declaration that the independent auditor is independent in a form as may be specified by the competent authority; | Section 2.2 | |
| 3 (1) c | an indication of the scope of, and the purpose for which, the environmental audit report was prepared; | Section 1.3 | |
| 3 (1) d | a description of the methodology adopted in preparing the environmental audit report; | Section 1.4 | |
| 3 (1) e | an indication of the ability of the EMPr, and where applicable, the closure plan to— (i) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an ongoing basis; (ii) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility; and (iii) ensure compliance with the provisions of environmental authorisation, EMPr, and where applicable, the closure plan; | Sections 4 and 6 | |
| 3 (1) f | a description of any assumptions made, and any uncertainties or gaps in knowledge; | Section 1.2 | |
| 3 (1) g | a description of any public consultation process that was undertaken during the course of carrying out the environmental audit report; | Sections 1.2 and 6 | |
| 3 (1) h | a summary and copies of any comments that were received during any public consultation process; and | N/a | |
| 3 (1) i | any other information requested by the competent authority. | No additional requirements known at this point. | |

1.4 AUDIT METHODOLOGY

The following methodology was employed for this external compliance audit:

1.4.1 Pre-audit tasks

Review of the various approvals / documents relevant to the proposed development, namely:

- Amended EA (17 July 2013) issued by the DFFE; and
- Environmental Management Programme (EMPr) approved as part of the EA.
- Review of the December 2019 Regulation 54 A(3) report prepared by NCC.

Preparation of audit report template, which includes transfer of conditions of approval of the EA into the report to inform the auditor's enquiries during the on-site inspection.

1.4.2 On-site audit

A site visit was undertaken on 22 August 2024 by Ingrid Eggert (Pr. EAP. 2019/805). The auditor was accompanied by Mainstream representatives Mr. Pieter de Villiers and Mr. Kevin Theys. The site walkabout served to give the auditor an understanding of the environmental setting and the specific aspects of the proposed development, especially as it relates to the relevant approvals and the various project phases. Operational activities were observed, and interviews on compliance matters were held with key parties.

1.4.3 Reporting

Compilation of the audit report based on the information obtained during the audit inspection and subsequent follow-up liaison with the representative of the holder of the EA. An electronic copy of the final report is issued to the Holder of the EA.

In line with regulatory requirements, the report will be submitted to the Competent Authority and to Interested and Affected Parties.

2. EXPERTISE OF THE AUDITOR

2.1 INGRID EGGERT (AUDITOR AND AUTHOR OF AUDIT REPORT)

Ingrid Eggert is a certified Environmental Assessment Practitioner with the Environmental Assessment Practitioner Association of South Africa (#2019/805), a member of the International Association of Impact Assessors of South Africa (#2874) as well as a committee member of APES+ (the Society of Architects Planners Engineers Surveyors as well as other built environment professionals). She holds a BA Environmental Management degree and has 15+ years' experience in applying international environmental best practice for projects in the design, construction and operational phases. She has extensive experience in EIA processes and associated submissions to authorities for approval as well as environmental compliance monitoring and auditing for the construction and operational phases of various developments. Ingrid has also been involved in the development and implementation of Environmental Management Systems for organisations across diverse industries. Her CV is available on request.

2.2 STATEMENT OF INDEPENDENCE

In Clover Environmental Consulting (Pty) Ltd was appointed to carry out the external compliance audit and compile this resultant Audit Report. Neither Ingrid Eggert in her private capacity, nor In Clover Environmental Consulting (Pty) Ltd have any material present or contingent interest in the outcome of this report, nor do they have any pecuniary or other interest that could be reasonably regarded as being capable of affecting their independence. In Clover Environmental Consulting (Pty) Ltd has no beneficial interest in the outcome of this compliance audit, other than reasonable remuneration for work performed in undertaking the audit inspection and compiling this report.



Ingrid Eggert

20 November 2024

3. COMPLIANCE WITH AUTHORISATIONS

The comprehensive table overleaf details compliance with the respective conditions of the Amended EA.

| | | | | |
|--------------------------|-----------------------------|--|---|----------------------|
| Date: | Site visit – 22 August 2024 | | | |
| Auditor: | Ingrid Eggert | In Clover Environmental Consultants (Pty) Ltd | | |
| Document audited: | Document Reference | Document Title | Departmental Reference Number | Date of Issue |
| | A | Amendment of the Environmental Authorisation in terms of the NEMA EIA Regulations, 2014 (as amended) Issued by DFFE. | Reference number: 12/12/20/2321/3/2A | 17 July 2013 |

Shading Key

| | | | | | | | |
|-------------------|---|---------------------------|-----|-----------------------|---|-----------------------|-----|
| Compliance | ✓ | Partial compliance | ✓/X | Non-compliance | X | Not Applicable | N/A |
|-------------------|---|---------------------------|-----|-----------------------|---|-----------------------|-----|

| Document Reference Number | Issue to Review | COMPLIANCE ✓/X/NA | Rationale/Appendix/ Proof/Site observation Notes and Recommendations |
|-------------------------------------|--|------------------------------|--|
| A: <i>Scope of Authorisation</i> | 1. The preferred site on the Remainder of the Farm No. 226, Calvinia Road for 140 MW is approved. | ✓ | The development is limited to the approved land parcels. |
| A: <i>Scope of Authorisation</i> | 2. Authorisation of the activity is subject to the conditions contained in this authorisation, which form part of the environmental authorisation and are binding on the holder of the authorisation. | N/A | Statement. Not auditable. |
| A: <i>Scope of Authorisation</i> | 3. The holder of this authorisation is responsible for ensuring compliance with the conditions contained in this environmental authorisation. This includes any person acting on the holder's behalf, including but not limited to, an agent, servant, contractor, sub-contractor, employee, consultant or person rendering a service to the holder of this authorisation. | ✓ | Environmental obligations are included in service provider agreements / contracts. |

| Document Reference Number | Issue to Review | COMPLIANCE ✓/X/NA | Rationale/Appendix/ Proof/Site observation Notes and Recommendations |
|--|--|----------------------|--|
| A: <i>Scope of Authorisation</i> | 4. The activities authorised may only be carried out at the property as described above. | ✓ | The development is limited to the approved land parcels. |
| A: <i>Scope of Authorisation</i> | 5. Any changes to, or deviations from, the project description set out in this authorisation must be approved, in writing, by the Department before such changes or deviations may be effected. In assessing whether to grant such approval or not, the Department may request such information as it deems necessary to evaluate the significance and impacts of such changes or deviations and it may be necessary for the holder of the authorisation to apply for further authorisation in terms of the regulations. | ✓ | No deviations from the amended EA issued 17 July 2013. |
| A: <i>Scope of Authorisation</i> | 6. This activity must commence within a period of three (3) years from the date of issue. If commencement of the activity does not occur within that period, the authorisation lapses and a new application for environmental authorisation must be made in order for the activity to be undertaken. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Scope of Authorisation</i> | 7. Commencement with one activity listed in terms of this authorisation constitutes commencement of all authorised activities. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Scope of Authorisation</i> | 8. The holder of an environmental authorisation has the responsibility to notify the competent authority of any alienation, transfer and change of ownership rights in the property on which the activity is to take place. | N/A | This condition is acknowledged by the Holder of the EA. No alienation, transfer and change of ownership rights relevant to the property on which the WEF is operating. |
| A: <i>Notification of authorisation and right to appeal</i> | 9. The holder of this authorisation must notify every registered interested and affected party, in writing and within 12 (twelve) calendar days of the date of this environmental authorisation, of the decision to authorise the activity. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Notification of authorisation and right to appeal</i> | 10. The notification referred to must: 10.1 Specify the date on which the authorisation was issued; 10.2 Inform the interested and affected party of the appeal procedure provided for in Chapter 7 of the Environmental Impact Assessment (EIA) Regulations, 2010; 10.3 Advise the interested and affected party that a copy of the authorisation will be furnished on requested; and 10.4 Give the reasons for the decision. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: | 11. The holder of the authorisation must publish a notice – 11.1 Informing interested and affected parties of the decision; | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |

| Document Reference Number | Issue to Review | COMPLIANCE ✓/X/NA | Rationale/Appendix/ Proof/Site observation Notes and Recommendations |
|--|--|----------------------|--|
| <i>Notification of authorisation and right to appeal</i> | <p>11.2 Informing interested and affected parties where the decision can be assessed; and</p> <p>11.3 Drawing the attention of interested and affected parties to the fact that an appeal may be lodged against this decision in the newspaper(s) contemplated and used in terms of regulation 54(2)(c) and (d) and which newspaper was used for the placing of advertisements as part of the public participation process.</p> | | |
| A: <i>Management of the activity</i> | <p>12. A copy of the final site layout map must be submitted to the Department with the amended EMPr for written approval prior to commencement of the activity. All available biodiversity information must be used in the finalisation of the layout map. The site layout map must indicate the following:</p> <p>12.1 Labelled/Numbered turbine positions;</p> <p>12.2 Foundation footprint;</p> <p>12.3 Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting in sections possible);</p> <p>12.4 Wetlands, drainage lines, rivers, stream and water crossing of roads and cables indicating the type of bridging structures that will be used;</p> <p>12.5 The location of sensitive environmental features e.g. heritage sites;</p> <p>12.6 Sub-station(s) and/or transformer(s) sites including their entire footprint;</p> <p>12.7 Connection routes (including pylon positions) to the distribution/transmission network;</p> <p>12.8 All existing infrastructure on the site, especially roads;</p> <p>12.9 Buildings including accommodation;</p> <p>12.10 All “no-go” and buffer areas; and</p> <p>12.11 A map combining the final layout map superimposed on the environmental sensitivity map. This map must reflect the proposed location of turbines as stated in the EIR dated May 2013 and this authorisation.</p> | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Management of the activity</i> | 13. The Environmental Management Programme (EMPr) submitted as part of the EIR dated May 2013 must be amended and submitted with the abovementioned layout map to the Department for written approval prior to commencement of the activity. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Management of the activity</i> | <p>14. The amended EMPr must also include the following:</p> <p>14.1 All recommendations and mitigation measures recorded in the EIR dated May 2013.</p> | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). |

| Document Reference Number | Issue to Review | COMPLIANCE ✓/X/NA | Rationale/Appendix/ Proof/Site observation Notes and Recommendations |
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| | <p>14.2 The requirements and conditions of this authorisation.</p> <p>14.3 A plant rescue and protection plan which allows for the maximum transplant of conservation important species from areas to be transformed. This plan must be compiled by a vegetation specialist familiar with the site in consultation with the ECO and be implemented prior to commencement of the construction phase.</p> <p>14.4 An open space management plan to be implemented during the construction and operation of the facility.</p> <p>14.5 A re-vegetation and habitat rehabilitation plan to be implemented during the construction and operation of the facility including timeframes for restoration which must indicate rehabilitation within the shortest possible time after completion of construction activities to reduce the amount of rabbitat converted at any one time and to speed up the recovery to natural habitats.</p> <p>14.6 An alien invasive management plan to be implemented during construction and operation of the facility. The plan must include mitigation measures to reduce the invasion of alien species and ensure that the continuous monitoring and removal of alien species is undertaken.</p> <p>14.7 A storm water management plan to be implemented during the construction and operation of the facility. The plan must ensure compliance with applicable regulations and prevent off-site migration of contaminated storm water to increased soil erosion. The plan must include the construction of appropriate design measures that allow surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows. Drainage measures must promote the dissipation of storm water run-off.</p> <p>14.8 An effective monitoring system to detect any leakage or spillage of all hazardous substances during their transportation, handling, use and storage. This must include precautionary measures to limit the possibility of oil and other toxic liquids from entering the soil or storm water systems.</p> <p>14.9 An erosion management plan for monitoring and rehabilitating erosion events associated with the facility. Appropriate erosion mitigation must form part of this plan to prevent and reduce the risk of any potential erosion.</p> | | <p>This condition is not relevant to the operational phase of the WEF. Compliance with the operational phase aspects of the amended EMPr is detailed in Section 4 of this report.</p> |

| Document Reference Number | Issue to Review | COMPLIANCE ✓/X/NA | Rationale/Appendix/ Proof/Site observation Notes and Recommendations |
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| | <p>14.10 A transportation plan for the transport of turbine components, main assembly cranes and other large pieces of equipment. A permit must be obtained from the relevant transport department for the transportation of all components (abnormal loads) to the sites.</p> <p>14.11 A traffic management plan for the site access roads to ensure that no hazards would result from the increased truck traffic and that traffic flow would not be adversely impacted. This plan must include measures to minimise impacts on local commuters e.g. limiting construction vehicles travelling on public roadways during the morning and late afternoon commute time and avoid using roads through densely populated built-up areas so as not to disturb existing retail and commercial operations.</p> <p>14.12 An avifauna and bat monitoring programme to document the effect of the operation of the energy facility on avifauna and bats. This must be compiled by a qualified specialist.</p> <p>14.13 Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants.</p> <p>14.14 An environmental sensitivity map indicating environmental sensitive areas and features, and buffer areas identified during the EIA process.</p> | | |
| A: <i>Management of the activity</i> | 15. The approved EMPr must be implemented and strictly enforced during all phases of the project. It shall be seen as a dynamic document and shall be included in all contract documentation for all phases of the development when approved. | ✓ | Operational phase activities of the WEF are subject to the operational phase specifications of the approved, amended EMPr. Environmental obligations are stipulated in service provider contracts. |
| A: <i>Management of the activity</i> | 16. Changes to the EMPr, which are environmentally defensible, shall be submitted to this Department for acceptance before such changes could be effected. | N/A | No changes required at this time. |
| A: <i>Management of the activity</i> | 17. The Department reserves the right to request amendments to the EMPr should any impacts that were not anticipated or covered in the EIR be discovered. | N/A | Noted by the Holder of the EA. |
| A: <i>Management of the activity</i> | 18. The provisions of the approved EMPr including the mitigation measures identified in the EIR and specialist' studies shall be an extension of the conditions of this EA and therefore noncompliance with them would constitute noncompliance with the EA. | N/A | Acknowledged by the Holder of the EA. |

| Document Reference Number | Issue to Review | COMPLIANCE ✓/X/NA | Rationale/Appendix/ Proof/Site observation Notes and Recommendations |
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| A: <i>Management of the activity</i> | 19. The holder of this authorisation must appoint qualified botanical, fauna and avifauna specialists to ground-truth every infrastructure footprint and their recommendation must inform the final layout of the facility and the EMPr to be submitted to the department for approval. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Environmental Control Officer (ECO) and duties</i> | 20. The holder of this authorisation must appoint an independent Environmental Control Officer (ECO) with experience or expertise in the field for the construction phase of the development. The ECO will have the responsibility to ensure that the conditions referred to in this authorisation are implemented and to ensure compliance with the provisions of the EMPr. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. NOTE: The EMPr calls for yearly ECO audits in the operational phase, the Holder of the EA opted for more frequent quarterly audits to ensure early detection of environmental concerns. |
| A: <i>Environmental Control Officer (ECO) and duties</i> | 21. The ECO must be appointed before commencement of any authorised activity. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Environmental Control Officer (ECO) and duties</i> | 22. Once appointed, the name and contact details of the ECO must be submitted to the Director: Compliance Monitoring of the Department. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Environmental Control Officer (ECO) and duties</i> | 23. The ECO must remain employed until all rehabilitation measures, as required for implementation due to construction damage, are completed and the site is ready for operation. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Environmental Control Officer (ECO) and duties</i> | 24. The ECO must: 24.1 Keep record of all activities on site, problems identified, transgressions noted and a schedule of tasks undertaken by the ECO. 24.2 Keep and maintain a detailed incident (including spillage of bitumen, fuels, chemicals, or any other material) and complaint register on site indicating how these issues were addressed, what rehabilitation measures were taken and what preventative measures were implemented to avoid re-occurrence of incidents/complaints. 24.3 Keep and maintain a daily site diary. 24.4 Keep copies of all reports submitted to the Department. 24.5 Keep and maintain a schedule of current site activities including the monitoring of such activities. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |

| Document Reference Number | Issue to Review | COMPLIANCE ✓/X/NA | Rationale/Appendix/ Proof/Site observation Notes and Recommendations |
|--|---|----------------------|---|
| | 24.6 Obtain and keep record of all documentation, permits, licences and authorisations such as waste disposal certificates, hazardous waste landfill site licences etc. required by this facility. 24.7 Compile a monthly monitoring report. | | |
| A: <i>Recording and reporting to the Department</i> | 25. The holder of this authorisation must keep all records relating to monitoring and auditing on site and make it available for inspection to any relevant and competent authority in respect of this development. | ✓ | These documents are readily available. The facility uses SharePoint, an electronic document management system. |
| A: <i>Recording and reporting to the Department</i> | 26. All documentation e.g. audit/monitoring/compliance reports and notifications, required to be submitted to the Department in terms of this authorisation, must be submitted to the <i>Director: Compliance Monitoring</i> at the Department. | ✓ | The Holder of the EA relies on the consultants / specialists / auditors to make the necessary submissions to the Department. Proof of submission of the December 2019 report by NCC is however no longer available on NCC's system. |
| A: <i>Environmental audit report</i> | 27. The holder of the authorisation must submit an environmental audit report to the Department within 30 days of completion of the construction phase (i.e. within 30 days of site handover) and within 30 days of completion of rehabilitation activities. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Environmental audit report</i> | 28. The environmental audit report must: 28.1 Be compiled by an independent environmental auditor; 28.2 Indicate the date of the audit, the name of the auditor and the outcome of the audit; 28.3 Evaluate compliance with the requirements of the approved EMPr and this environmental authorisation; 28.4 Include measures to be implemented to attend to any non-compliance or degradation noted; 28.5 Include copies of any approvals granted by other authorities relevant to the development for the reporting period; 28.6 Highlight any outstanding environmental issues that must be addressed, along with recommendations for ensuring these issues are appropriately addressed; 28.7 Include a copy of this authorisation and the approved EMPr; 28.8 Include all documentation such as waste disposal certificates, hazardous waste landfill site licences etc. pertaining to this authorisation; and 28.9 Include evidence of adherence to the conditions of this authorisation and the EMPr where relevant such as training records and attendance records. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |

| Document Reference Number | Issue to Review | COMPLIANCE ✓/X/NA | Rationale/Appendix/ Proof/Site observation Notes and Recommendations |
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| A: <i>Commencement of the activity</i> | 29. The authorised activity shall not commence within twenty (20) days of the date of signature of the authorisation. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Commencement of the activity</i> | 30. An appeal under section 43 of the National Environmental Management Act (NEMA), Act 107 of 1998 (as amended), does not suspend an environmental authorisation or exemption, or any provisions or conditions attached thereto, or any directive, unless the Minister, MEC or delegated organ of state directs otherwise. | N/A | Appeal opportunities concluded prior to construction. |
| A: <i>Commencement of the activity</i> | 31. Should you be notified by the Minister of a suspension of the authorisation pending appeal procedures, you may not commence with the activity until such time that the Minister allows you to commence with such an activity in writing. | N/A | Appeal opportunities concluded prior to construction. |
| A: <i>Commencement of the activity</i> | 32. The holder of this authorisation must obtain a Water Use Licence from the Department of Water Affairs (DWA) prior to the commencement of the project should the holder impact on any wetland or water resource. A copy of the license must be kept by the ECO. | ✓ | The facility is subject to a General Authorisation. |
| A: <i>Notification to authorities</i> | 33. Fourteen (14) days written notice must be given to the Department that the activity will commence. Commencement for the purposes of this condition includes site preparation. The notice must include a date on which it is anticipated that the activity will commence. This notification period may coincide with the Notice of Intent to Appeal period, within which construction may not commence. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Operation of the activity</i> | 34. Fourteen (14) days written notice must be given to the Department that the activity operation phase will commence. | ✓ | A notice of imminent commencement of operations was submitted to the Department on 17 November 2017 and the facility became operational 20 days thereafter, on 8 December 2017. |
| A: <i>Operation of the activity</i> | 35. The holder of this authorisation must compile an operation EMPr for the operational phase of the activity or alternatively, if the holder has an existing operational environmental management system, it must be amended to include the operation of the authorised activity. | ✓ | The EMPr makes provision for operational phase activities, where relevant. Compliance with these requirements is detailed in Section 4 of this report. |
| A: <i>Site closure and decommissioning</i> | 36. Should the activity ever cease or become redundant, the applicant shall undertake the required actions as prescribed by legislation at the time and comply with all relevant legal requirements administered by any relevant and competent authority at that time. | N/A | The facility remains operational at this point in time. The Holder of the EA notes this requirement should decommissioning be proposed. |
| A: <i>Specific conditions:</i> | 37. A bird and bat monitoring programme must be implemented for a period of 12 (twelve) months prior to construction to document the effect of the operation of the energy facility on avifauna and bats. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |

| Document Reference Number | Issue to Review | COMPLIANCE ✓/X/NA | Rationale/Appendix/ Proof/Site observation Notes and Recommendations |
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| <i>Avifauna and Bats Monitoring</i> | | | |
| A: <i>Specific conditions: Avifauna and Bats Monitoring</i> | 38. The findings/recommendations of the pre-construction bird monitoring programme must inform the final layout map and the construction schedule of the energy facility. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Specific conditions: Avifauna and Bats Monitoring</i> | 39. Reports regarding bird monitoring must be submitted to the relevant provincial environmental department, BirdLife South Africa, the Endangered Wildlife Trust (EWT) and this Department on a quarterly basis. The report will assist all stakeholders in identifying potential and additional mitigation measures and to establish protocols for a bird monitoring programme for wind energy development in the country. | ✓ | Avifaunal monitoring continues in the operational phase. The 2-year monitoring was concluded in terms of the EA Conditions and the facility is now abiding by Guidelines as issued under BirdLife South Africa and SABAA Guidelines. Carcass collection reports for the 5th year monitoring period were provided to the auditor. To date, the data has not warranted the need for the specialist team to recommend additional avifaunal mitigation measures. The reports were submitted to the stakeholders, as detailed. |
| A: <i>Specific conditions: Avifauna and Bats Monitoring</i> | 40. The baseline data collected and documented during the survey must be shared with the EWT and BirdLife South Africa for a better understanding of the distribution or breeding behaviour of any of the priority species. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Specific conditions: Avifauna and Bats Monitoring</i> | 41. The applicant must ensure that lighting on the turbines is kept to a minimum and is coloured (red or green) and intermittent, rather than permanent and white, to reduce confusion effects for nocturnal migrants. | ✓ | Some towers are fitted with intermittent red lights. |
| A: <i>Specific conditions: Avifauna and Bats Monitoring</i> | 42. The facility must be designed to discourage the use of infrastructure components as perching or roosting substrates by birds and bats. | ✓ | The design is compliant. Bird diverters remain installed in the operational phase. Nesting is actively discouraged on WEF buildings and infrastructure. |
| A: <i>Specific conditions: Avifauna and Bats Monitoring</i> | 43. Anti-collision devices such as bird flappers must be installed where power lines cross avifaunal corridors (e.g. grasslands, rivers, wetlands, and dams). The input of an avifaunal specialist must be obtained for the fitting of the anti-collision devices onto specific sections of the line once the exact positions of the towers have been surveyed and pegged. Additional areas of high sensitivity along the preferred alignment must also be identified by the avifaunal specialist for the | ✓ | The design is compliant and was informed by specialist input. Bird diverters remain installed in the operational phase. To date, the operational avifaunal monitoring has not identified the need for additional mitigation measures. |

| Document Reference Number | Issue to Review | COMPLIANCE ✓/X/NA | Rationale/Appendix/ Proof/Site observation Notes and Recommendations |
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| | fitment of anti-collision devices. These devices must be according to Eskom's Transmission and EWT's Guidelines. | | |
| A: <i>Vegetation, wetlands and water resources</i> | 44. Vegetation clearing must be limited to the authorised footprint. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Vegetation, wetlands and water resources</i> | 45. Before the clearing of the site, the appropriate permits must be obtained from the Department of Agriculture, Forestry and Fisheries (DAFF) for the removal of plants listed in the National Forest Act and from the relevant provincial department for the destruction of species protected in terms of the specific provincial legislation. Copies of the permits must be kept by the ECO. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Vegetation, wetlands and water resources</i> | 46. Construction activities must be restricted to demarcated areas to restrict the impact on sensitive environmental features. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Vegetation, wetlands and water resources</i> | 47. All areas of disturbed soil must be reclaimed using only indigenous grass and shrubs. Reclamation activities shall be undertaken according to the rehabilitation plan to be included in the final EMPr. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: | 48. Topsoil from all excavations and construction activities must be salvaged and reapplied during declamation. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Vegetation, wetlands and water resources</i> | 49. No exotic plants may be used for rehabilitation purposes, only indigenous plants of the area may be utilised. | ✓ | No exotic species were noted. No further need for rehabilitation at this point. |
| A: <i>Vegetation, wetlands and water resources</i> | 50. No activities will be allowed to encroach into a water resource without a water use license being in place from the Department of Water Affairs. | ✓ | The facility is subject to a General Authorisation. |
| A: <i>Vegetation, wetlands and water resources</i> | 51. Cleared alien vegetation must not be dumped on adjacent intact vegetation during clearing but must be temporarily stored in a demarcated area. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |

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| A: <i>Vegetation, wetlands and water resources</i> | 52. Removal of alien invasive species or other vegetation and follow-up procedures must be in accordance with the Conservation of Agricultural Resources Act, 1983 (Act 43 of 1983). | ✓ | No alien invasive species noted on the site. The procedure is noted by the Holder of the EA, should the need for alien invasive species clearance arise. |
| A: <i>Vegetation, wetlands and water resources</i> | 53. The holder of this authorisation must ensure that all the “No-go” areas are clearly demarcated (using fencing and appropriate signage) before construction commences. | ✓ | The operational footprint continues to exclude No-go areas. |
| A: <i>Vegetation, wetlands and water resources</i> | 54. Contractors and construction workers must be clearly informed of the no-go areas. | ✓ | Operational service providers / contractors are informed of the requirement to limit actions to the operational footprint. |
| A: <i>Vegetation, wetlands and water resources</i> | 55. Where roads pass right next to major water bodies provision shall be made for fauna such as toads to pass under the roads by using culverts or similar structures. | N/A | This condition is not applicable to the facility. |
| A: <i>Vegetation, wetlands and water resources</i> | 56. Bridge design must be such that it minimise impact to riparian areas with minimal alterations to water flow and must allow the movement of fauna and flora. | N/A | This condition is not applicable to the facility. |
| A: <i>Roads and transportation</i> | 57. Existing road infrastructure must be used as far as possible for providing access to the proposed turbine positions. Where no road infrastructure exists, new roads should be placed within existing disturbed areas or environmental conditions must be taken into account to ensure the minimum amount of damage is caused to natural habitats. | ✓ | No new roadways created since conclusion of construction. Roads are in accordance with the 2014 approved layout plan. |
| A: <i>Roads and transportation</i> | 58. Signs must be placed along construction roads to identify speed limits, travel restrictions, and other standard traffic control information. To minimise impacts on local commuter, consideration should be given to limiting construction vehicles travelling on public roadways during the morning and late afternoon commute time. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Roads and transportation</i> | 59. Internal access roads must be located to minimise stream crossings. All structures crossing streams must be located and constructed so that they do not decrease channel stability or increase water velocity. | ✓ | No new roadways created since conclusion of construction. Roads are in accordance with the 2014 approved layout plan. |
| A: | 60. A designated access to the site must be created and clearly marked to ensure safe entry and exit. | ✓ | The site access is clearly marked and safe for workers / visitors to the site as well as other road users. |

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| <i>Roads and transportation</i> | | | |
| A: <i>Roads and transportation</i> | 61. Signage must be erected at appropriate points warning of turning traffic and the construction site. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Roads and transportation</i> | 62. Construction vehicles carrying materials to the site should avoid using roads through densely populated built-up areas so as not to disturb existing retail and commercial operations. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Roads and transportation</i> | 63. Road borders should be regularly maintained to ensure that vegetation remains short and that they therefore serve as an effective firebreak. | ✓ | No non-conformances observed. Natural vegetation growth in the area does not require extensive clearance of road verges to create effective firebreaks. |
| A: <i>Noise</i> | 64. Noise from the turbines at the identified noise sensitive areas must be less than the 45dB(A) limit for rural areas presented in SANS10103. | N/A | No identified noise sensitive areas. No excessive noise experienced on site amongst the turbines. |
| A: <i>Noise</i> | 65. The holder of this authorisation must ensure that the National Noise Control Regulations and SANS10103:2008 are adhered to and measures to limit noise from the work site are implemented. | ✓ | No excessive noise experienced on site or at the O&M facilities. |
| A: <i>Noise</i> | 66. The holder of this authorisation must ensure that the construction staff working in areas where the 8-hour ambient noise levels exceed 75dBA must wear ear protection equipment. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Noise</i> | 67. The holder of this authorisation must ensure that all equipment and machinery are well maintained and equipped with silencers. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Noise</i> | 68. The holder of this authorisation must provide a prior warning to the community when a noisy activity e.g. blasting is to take place. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Noise</i> | 69. All wind turbines should be located at a setback distance of 500m from any homestead and a day/night noise criteria level at the nearest residents of 45dB(A) should be used to locate the turbines. The 500m setback distance can be relaxed if local factors, such as high ground between the noise source and the receiver, indicates that a noise disturbance will not occur. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Noise</i> | 70. Positions of turbines jeopardizing compliance with accepted noise levels must be revised during the micro-siting of the units in question and predicted noise levels re-modelled by the noise specialist, in order to ensure that the predicted noise levels are less than 45dB(A). | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |

| Document Reference Number | Issue to Review | COMPLIANCE ✓/X/NA | Rationale/Appendix/ Proof/Site observation Notes and Recommendations |
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| A: <i>Visual resources</i> | 71. The holder of this authorisation must reduce visual impacts during construction by minimising areas of surface disturbance, controlling erosion, using dust suppression techniques and restoring exposed soil as closely as possible to their original contour and vegetation. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Visual resources</i> | 72. A lighting engineer must be consulted to assist in the planning and placement of light fixtures in order to reduce visual impacts associated with glare and light trespass. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Visual resources</i> | 73. Lighting of main structures (turbines) and ancillary buildings should be designed to minimise light pollution without compromising safety, and turbines must be lit according to Civil Aviation Regulations. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Visual resources</i> | 74. Signage on or near wind turbines must be avoided unless they serve to inform the public about wind turbines and their function. | ✓ | No unnecessary or excessive signage present on site. |
| A: <i>Visual resources</i> | 75. Commercial messages and graffiti on turbines must be avoided. | ✓ | None noted on the turbines or within the site and surrounds. |
| A: <i>Human health and safety</i> | 76. A health and safety programme must be developed to protect both workers and the general public during construction, operation and decommissioning of the energy facility. The programme must establish a safety zone for wind turbines from residences and occupied buildings, roads, right-of-ways and other public access areas that is sufficient to prevent accidents resulting from the operation of the wind turbines. | ✓ | All personnel and visitors receive induction upon entering the facility. Extensive Health and Safety provisions were noted during the audit inspection. |
| A: <i>Human health and safety</i> | 77. Potentials interference with public safety communication systems (e.g. radio traffic related to emergency activities) must be avoided. | ✓ | No complaints or comments received in respect of communication interference. |
| A: <i>Human health and safety</i> | 78. The holder of this authorisation must ensure that the operation of the wind facility shall comply with the relevant communication regulations or guidelines relating to electromagnetic interference, e.g. microwave, radio and television transmissions. | ✓ | No non-conformances noted to date. |
| A: <i>Human health and safety</i> | 79. The holder of this authorisation must obtain approval from the South Africa Civil Aviation Authority that the wind facility will not interfere with the performance of aerodrome radio Communication, Navigation and Surveillance (CNS) equipment, especially the radar, prior to commencement of the activity. A copy of the approval must be kept on site by the ECO. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Human health and safety</i> | 80. The holder of the authorisation must ensure that the operation of the wind facility has no impact at all to the Square Kilometre Array (SKA). | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |

| Document Reference Number | Issue to Review | COMPLIANCE ✓/X/NA | Rationale/Appendix/ Proof/Site observation Notes and Recommendations |
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| A: <i>Human health and safety</i> | 81. The holder of this authorisation must obtain approval from the South Africa Weather Services (WeatherSA) that the energy facility will not interfere with the performance of their equipment, especially radar, prior to commencement of the activity. A copy of the approval must be kept on site by the ECO. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Human health and safety</i> | 82. The holder of this authorisation must train safety representatives, managers and workers in workplace safety. The construction process must be compliant with all safety and health measures as prescribed by the relevant act. | ✓ | Safety representatives are appointed and trained for the operational phase requirements. |
| A: <i>Human health and safety</i> | 83. Liaison with land owners/farm managers must be done prior to construction in order to provide sufficient time for them to plan agricultural activities. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Human health and safety</i> | 84. No unsupervised fires are allowed on site. | ✓ | There is no evidence of unsupervised fires on site. |
| A: <i>Hazardous materials and waste management</i> | 85. Areas around fuel tanks must be bunded or contained in an appropriate manner as per the requirements of SABS 089:1999 Part 1. | N/A | No fuel tanks on site for the operational phase of the project. |
| A: <i>Hazardous materials and waste management</i> | 86. Leakage of fuel must be avoided at all times and if spillage occurs, it must be remedied immediately. | N/A | No fuel tanks on site for the operational phase of the project. |
| A: <i>Hazardous materials and waste management</i> | 87. Hazardous waste such as bitumen, oils, oily rags, paint tins, etc. must be disposed of at an approved waste landfill site licensed to accept such waste. | ✓ | Hazardous waste generated on site are temporarily stored in covered skips within the O&M yard. A waste contactor (Simplify Waste) removes the waste and provides proof of safe disposal at Vissershok licensed hazardous landfill site. |
| A: <i>Hazardous materials and waste management</i> | 88. No dumping or temporary storage of any materials may take place outside designated and demarcated laydown areas, and these must all be located within areas of low environmental sensitivity. | ✓ | Operational phase waste management is contained to the O&M yard. No waste dumping observed. |

| Document Reference Number | Issue to Review | COMPLIANCE ✓/X/NA | Rationale/Appendix/ Proof/Site observation Notes and Recommendations |
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| A: <i>Hazardous materials and waste management</i> | 89. Hazardous substances must not be stored where there could be accidental leakage into surface or subterranean water. | ✓ | Substances with the potential to pollute are stored in the dedicated, bunded chemical store, or with appropriate secondary containment to prevent spills / leaks to the environment. |
| A: <i>Hazardous materials and waste management</i> | 90. Hazardous and flammable substances must be stored and used in compliance to the applicable regulations and safety instructions. Furthermore, no chemicals must be stored nor may any vehicle maintenance occur within 350m of the temporal zone of wetlands, a drainage line with or without an extensive floodplain or hillside wetlands. | ✓ | All hazardous substances are stored in bunded areas within the O&M yard, in accordance with MSDS storage instructions. |
| A: <i>Hazardous materials and waste management</i> | 91. Temporary bunds must be constructed around chemical storage to contain possible spills. | N/A | Temporary bunds were relevant to the construction phase. Formalised bunded areas / structures are in use in the operational phase. |
| A: <i>Hazardous materials and waste management</i> | 92. Spill kits must be made available on-site for the clean-up of spills. | ✓ | Several spill kits are available. |
| A: <i>Hazardous materials and waste management</i> | 93. An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate reduction, recycling and re-use options where appropriate. Where solid waste is disposed of, such disposal shall only occur at a landfill licensed in terms of section 20(b) of the National Environmental Management Waste Act, 2008 (Act 59 of 2008). | ✓ | The facility is fully compliant with this condition. Reusable / recyclable wastes are separated and collected by recycling firms (e.g. Oilcol collects used oils). Items / substances are reused where possible. Non-recyclable wastes are separated into general and hazardous waste, and appointed contractors remove loads from the site for disposal to licensed landfill facilities. |
| A: <i>Hazardous materials and waste management</i> | 94. Temporary ablution facilities must be provided for staff during the construction phase. The ablutions must be cleaned regularly with associated waste being disposed of at a registered waste water treatment plant, and must be removed from the site when the construction phase is completed. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Excavation and blasting activities</i> | 95. Underground cables and internal access roads must be aligned as much as possible along existing infrastructure to limit damage to vegetation and watercourses. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |

| Document Reference Number | Issue to Review | COMPLIANCE ✓/X/NA | Rationale/Appendix/ Proof/Site observation Notes and Recommendations |
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| A: <i>Excavation and blasting activities</i> | 96. Foundations and trenches must be backfilled with originally excavated materials as much as possible. Excess excavation materials must be disposed of only in approved areas or, if suitable, stockpiled for use in reclamation activities. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Excavation and blasting activities</i> | 97. Borrow materials must be obtained only from authorised and permitted sites. Permits must be kept on site by the ECO. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Excavation and blasting activities</i> | 98. Anti-erosion measures such as silt fences must be installed in disturbed areas. | ✓ | No erosion noted on site. The necessary stormwater management measures are in place to prevent water erosion. |
| A: <i>Air emissions</i> | 99. Dust abatement techniques must be used before and during surface clearing, excavation, or blasting activities. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Air emissions</i> | 100. Appropriate dust suppression techniques must be implemented on all exposed surfaces during periods of high wind. Such measures may include wet suppression, chemical stabilisation, the use of a wind fence, covering surfaces with straw chippings and re-vegetation of open areas. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Historical / cultural / paleontological resources</i> | 101. If any changes to the approved site layout of the turbines are proposed, additional survey work will be required in order to ensure that no sites are directly impacted and/or to identify the need for an excavation permit. | N/A | No site layout amendments proposed at this stage. The Holder of the EA however takes note of this requirement. |
| A: <i>Historical / cultural / paleontological resources</i> | 102. If concentrations of archaeological heritage materials, fossils and human remains are uncovered during construction, all work must cease immediately and be reported to the South African Heritage Resources Agency (SAHRA) (021 642 4502) so that a systematic and professional investigation / excavation can be undertaken. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Historical / cultural / paleontological resources</i> | 103. Construction managers/foreman must be informed before construction starts on the possible types of heritage sites and cultural material they may be encountered and the procedures to follow when they find sites. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>Turbines position</i> | 104. Turbines must be positioned in such a way that shadow flicker does not affect any farm buildings. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |

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| A: <i>Overhead power line</i> | 105. A walk-through survey of the final power line corridor must be undertaken by a botanical specialist, an ornithologist and a heritage specialist to identify areas where mitigation may be required. | N/A | Compliance with this condition of approval was verified and recorded in the first Regulation 54 (A)3 external compliance audit report (NCC, Dec 2019). This condition is not relevant to the operational phase of the WEF. |
| A: <i>General</i> | 106. A copy of this authorisation and the approved EMPr must be kept at the property where the activity will be undertaken. The authorisation must be produced to any authorised official of the Department who requests to see it and must be made available for inspection by any employee or agent of the holder of the authorisation who works or undertakes work at the property. | ✓ | These documents are readily available. The facility uses SharePoint, an electronic document management system. |
| A: <i>General</i> | 107. The holder of this authorisation must notify both the <i>Director: Integrated Environmental Authorisations</i> and the <i>Director: Compliance Monitoring</i> at the Department, in writing and within 48 (forty eight) hours, if any condition of this authorisation cannot be or is not adhered to. Any notification in terms of this condition must be accompanied by reasons for the non-compliance. | N/A | Facility operations are fully compliant with the applicable conditions of approval. The Holder of the EA however acknowledges this condition. |
| A: <i>General</i> | 108. National government, provincial government, local authorities or committees appointed in terms of the conditions of this authorisation or any other public authority shall not be held responsible for any damages or losses suffered by the applicant or his successor in title in any instance where construction or operation subsequent to construction be temporary or permanently stopped for reasons of non-compliance by the applicant with the conditions of authorisation as set out in this document or any other subsequent document emanating from these conditions of authorisation. | N/A | Noted by the Holder of the EA. |

4. CONSIDERATION OF THE OPERATIONAL EMPR

The auditors' findings in respect of the EMPr are based on the on-site observations at the time of the audit inspection and the operational phase ECO reports. Findings are limited to the operational phase requirements. It is worth repeating that compliance with design / construction phase EMPr specifications were audited and reported on in the December 2019 independent compliance audit undertaken by NCC.

The points below are noteworthy as it relates to compliance with the operational EMPr. Where issues have already been noted in the Table contained in Section 3, it is not necessarily repeated here.

- The O&M facilities at the Loeriesfontein 2 Wind Farm is shared with the Khobab Wind Farm.
- While the EMPr prescribes yearly ECO audits during the operational phase, the facility opted to increase the frequency to quarterly, to ensure the early detection of any possible environmental concerns. The latest quarterly ECO report (June 2024) showed a trend of full compliance with the EA and EMPr requirements.
- The auditor notes that 'construction site decommissioning' specifications are incorrectly listed under the operational phase section (Section 3.5) of the EMPr. Regardless, the auditor did not note any non-conformances in this regard.
- The Emergency Response Plan covers a full suite of emergencies, including those that can have impacts on the environment (floods, fire, spills of hazardous substances, incidents involving fauna or flora that could have medical implications, etc.). The Plan is deemed sufficient to effectively respond to environmental / other incidents.
- Stormwater infrastructure is maintained to ensure efficacy. There is no evidence of erosion, sedimentation or siltation on site.
- Access roads to the site & O&M facility (on the Loeriesfontein 2 Wind Farm) are in good condition. Maintenance responsibilities are shared by other key road users, including the nearby mine. Internal roads are well maintained, as needed.
- Vegetation has been re-established in areas scarred by construction, with no further need for active rehabilitation. No alien vegetation was observed.
- Waste management is appropriate, and care is taken to ensure responsible off-site disposal.
- Personnel, visitors and service providers receive induction training on environmental obligations, and ad-hoc toolbox talks are held as reminders.
- Fire-fighting equipment are serviced, as required, and are readily available on site.
- While the audit was undertaken during daylight hours, it is noted that lighting design meets the requirements of the EMPr to prevent undue light pollution / visual intrusion.
- Avifaunal monitoring continues in the operational phase (2-year monitoring was concluded in terms of the EA Conditions and the facility is now abiding by Guidelines as issued under BirdLife South Africa and SABAA Guidelines. Carcass collection reports for the 5th year monitoring period were provided to the auditor. To date, the data has not warranted the need for the specialist team to recommend additional avifaunal mitigation measures.

Overall, no non-conformances were observed in respect of the operational phase EMPr specifications. None of the findings / observations suggest that the EMPr is inadequate to manage the environmental impacts associated with the operational phase of the development.

The operational phase section of the EMPr includes a number of superfluous requirements that have already been addressed in the final layout, or that were relevant only to the construction phase of the project. However, in the opinion of the auditor it is not necessary to amend the EMPr to remove these conditions. They can simply be disregarded. In light of the above and the auditor's observations on the management of environmental matters on site, there is no need for amendments to the approved August 2014 EMPr.

5. PHOTOGRAPHIC RECORD

The photographs below are indicative of the site conditions on the day of the audit.



1. Posters sharing HSE requirements



2. Neat and orderly general storage area



3. Stocked spill kit available outside chemical store



4. Purpose built bunded chemical store



5. Built-in bund within the chemical store



6. Chemical store fitted with appropriate extraction



7. General waste storage cage



8. Fire extinguishers recently serviced and available where needed



9. Hydrocarbon spill kits



10. Danger signage displayed as needed



11. Oily rags and hazardous waste stored in skips with lids until removal from site



12. Stormwater drain



13. Used oil in secondary containment to contain leaks



14. Grease drums stored in secondary containment



15. Bird diverters fitted to OHL as required

6. CONCLUSION AND RECOMMENDATIONS

The external audit was undertaken as required by Regulation 54 A(3) and constitutes the second external compliance audit undertaken for the facility. The audit report meets the requirements of Appendix 7 of the 2014 EIA Regulations, as amended.

The first Regulation 54 A(3) audit conducted by NCC in December 2019 verified and reported on compliance with the design and construction phase aspects associated with the development. As such, it is not necessary to repeat those findings.

The following conclusions are drawn subsequent to the audit inspection and consideration of compliance with operational phase conditions of approval and EMP requirements:

- Overall, the operational development presented as a well-run facility with the environmental commitments being understood and observed.
- In respect of the EA, 70 of the 108 conditions of approval are not auditable / applicable to operational phase activities of the facility.
- The Holder of the EA achieved full compliance with all 38 applicable/auditable conditions (100%).
- Furthermore, there were no non-conformances noted in respect of relevant operational phase EMP requirements.
- This independent audit report therefore echoes the fully compliant findings of the June 2024 operational ECO report for the facility.
- It is evident that the mitigation measures contained in the Amended EA and EMP are sufficient and effective in preventing and/or limiting impacts that result from the operational phase actions. As such, there is no need for amendments to the approved August 2014 EMP.
- Other than the impacts assessed as part of the Environmental Impact Assessment and amendment application processes, the audit did not reveal any additional / new impacts or risks on the biophysical or social environment as it relates to the Khobab Wind Farm.
- No closure plan is relevant to the project. Should decommissioning be planned it would be subject to the necessary regulatory processes and the compilation and implementation of a closure plan.

The audit process itself had no implications for the rights of any parties, and as such, no public consultation was deemed necessary for the successful completion of this task, except the regulatory requirement to notify all potential and registered interested and affected parties of the submission of the report, and make the report available immediately to anyone on request, and on a publicly accessible website, where the holder has such a website.

In light of the high level of compliance that was achieved, recommendations are limited to the following:

- Submit this external audit report to the competent authority (task will be undertaken by the auditor, as agreed with the Holder of the EA).
- Within 7 days of the date of submission of the external audit report to the authorities, notify all potential and registered interested and affected parties of the submission of the report, and make the report available immediately to anyone on request (task will be undertaken by the auditor, as agreed with the Holder of the EA).
- Publish the report on Mainstream's website.

Yours sincerely,



Ingrid Eggert

In Clover Environmental Consulting

APPENDIX 1

CV OF THE AUDITOR



Ingrid Eggert

ENVIRONMENTAL ASSESSMENT PRACTITIONER

PERSONAL PROFILE

Experience in the field of environmental assessment and management on small and large scale projects – within a diverse range of industries.

AREAS OF EXPERTISE

- Environmental Impact Assessment processes (Scoping and Environmental Impact Assessments, Basic Assessments, Section 24GNEMA rectification processes, Waste Management/ Air Emission Licence applications). Ingrid is proficient in handling all components of these applications, including impact assessment, regulatory process management, compilation of reporting and plans, appointment and management of specialists, engagement with competent authorities, stakeholder and public engagement and engagement with multi-disciplinary professional teams;
- Specific environmental permit / licence applications (e.g. in relation to protected tree species, CARA ploughing permits etc.);
- Compilation of Environmental Management Programmes for the construction, operational, decommissioning and closure phases of projects;
- Facilitation of stakeholder engagement and public participation processes (in or out of the EIA ambit);
- Due diligence auditing;
- Compliance auditing (construction and operational phases);
- Environmental training/education;
- Development and implementation of Environmental Management Systems (including ISO 14001);
- Strategic environmental inputs and sustainability strategies; and
- Peer reviews.

GET IN CONTACT

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ABOUT INGRID

Profession/ Specialisation:

Environmental Assessment Practitioner

Date and place of birth:

1979/11/30 Stellenbosch, Western Cape

Tertiary Education:

- Bachelor's degree specialising in Environmental Management (University of South Africa) – obtained in 2008
- BSc Honours Geography (University of South Africa) – ongoing

Professional Registration:

Pr. EAP. 2019/805 (EAPASA)

Professional Associations:

International Association of Impact Assessments (SA Affiliation)

Career enhancing courses:

GCX Certified Carbon Footprint Analyst

Employment and position:

Director at In Clover Environmental Consulting (Pty) Ltd

Postgraduate employment record:

- August 2015 – present: Director and Principal Consultant at In Clover Environmental Consulting
- February 2009 – July 2015: Senior Environmental Consultant at Chand Environmental Consultants

SUMMARY OF PROFESSIONAL EXPERIENCE – ENVIRONMENTAL IMPACT ASSESSMENTS

The below track record demonstrates Ingrid's diversity in dealing with various aspects of the environmental discipline.

- Enkanini Informal Settlement Upgrading, Khayelitsha, Cape Town – Basic Assessment
- Greenpoint Phase 3 Low-Cost Housing Development, Khayelitsha, Cape Town – Basic Assessment
- Pelican Park Subsidized Housing Development, Cape Town – Basic Assessment Process as well as the extended design engagement process with the public and beneficiaries
- The Residential and/or Mixed-Use Development on four (4) Erven in Central Kommetjie – 4 x parallel Basic Assessment processes for:
 - – Village Centre (Kommetjie Central) mixed-use development
 - – Lighthouse residential development
 - – Wireless 1 residential development
 - – Wireless 2 residential development
- Schulz Vlei North: Mixed-use Development, Philippi – Basic Assessment Schulz Vlei South: Mixed-Use Development, Philippi – Basic Assessment Leeukoppie Residential Estate, Hout Bay – Basic Assessment
- 'Mile 16 Beach Estate', Yzerfontein – Part 2 Amendment Application
- Lord Charles Hotel and Conference Centre Re-Alignment of a Stream, Somerset West, Cape Town – Basic Assessment
- The Boardwalk Hotel and Conference Centre, Port Elizabeth, Eastern Cape – Basic Assessment
- Wastewater Treatment Works and associated infrastructure, Bonnievale – Basic Assessment
- Waste-to-Biogas Facility, Saldanha – Basic Assessment process and Waste Management Licence Application
- Atlantis Crematorium, Atlantis – Full Scoping & EIA and Air Emission Licence Application
- Pet Crematorium, Strand – Full Scoping & EIA
- Kromvlei Dam Expansion, Piketberg – Basic Assessment
- Infilling of a Wetland in Wetton, Cape Town – Basic Assessment
- Expansion of Agricultural Developments, Farm Welvaart, Ceres – Basic Assessment and Part 2 Amendment Application
- Weltevreden Fuel Station – Basic Assessment
- Redevelopment of Fuel Service Station in the V&A Waterfront – Basic Assessment
- Kuyasa Station Precinct, Khayelitsha, Cape Town – Basic Assessment
- The Development of the Kleinbron Industrial Estate, Brackenfell – Basic Assessment
- Leather Crusting (Secondary Tanning) Facility in Atlantis, Cape Town – Full Scoping & EIA and Air Emission Licence Application
- Pelts Tannery Waste Drying Beds, Port Elizabeth – Section 24G rectification process
- Development 3 (three) Cannabis Growing and Production Facilities, Maseru, Lesotho – Three EIA processes in terms of the Lesotho environmental legislation
- Edelweiss Pharmaceuticals Waste Burial, Cape Town – Environmental Impact Report on alleged illegal waste burial with related liaison with the law enforcement branch of the DEA&DP
- Composting Operation on Farm 782, Somerset West – Section 24G rectification
- Waste dumping on Farm Hygo, Philippi – Section 24G rectification
- Demolition and Redevelopment of a House on Erf 253, Bloubergstrand – Section 24G rectification
- Conversion of Existing Structures to Tourism Accommodation, Theewaterskloof – Section 24G rectification
- Education and Community Facilities, Greyton – Combination Basic Assessment
- Sitari Fuel Service Station, Sitari – Part 1 Amendment Application
- Worcester Service Station, Worcester – Basic Assessment
- Expansion of a dam, cultivation areas and connecting pipeline on Farm Vergelegen, Eilandia, Robertson – Full Scoping & EIA
- Cultivation of virgin soil on "Farm Holland, Rawsonville – Basic Assessment
- Concrete Batch Plant and Pre-cast Facility on Portion 11 of Farm Bultfontyn 128, Middleburg – Basic Assessment

- Ocean View Kommetjie Erf 5142 Road – Part 1 Amendment Application Ocean View Road Extension, Kommetjie – Basic Assessment
- Plastic Waste-To-Aggregate Facility on a Portion Of Erf 921, Blackheath – Waste Management Licence
- Louwville South Integrated Residential Development, Vredenburg – Full Scoping and EIA
- Agrivoltaic Installations on Erven 551 and 553 Schaapkraal– Basic Assessment
- Agrivoltaic Installations on Farms 788-6 and 792-Re Philippi – Basic Assessment
- Solar Energy Facility on Farms Re/695 and Re/26/174, Bonnievale – Basic Assessment
- Strandfontein Housing Project on Erven 1212-Re and 21168, Strandfontein – Basic Assessment
- New Crossroad Housing Development on Erf 11786-RE, Nyanga Ext 1, Cape Town – Basic Assessment

In addition, Ingrid has conducted in excess of 15 ad-hoc setback line adoption applications for several developments located along the Western Cape Coast as well as 25+ Environmental Screening exercises for various development proposals in and around the Western and Northern Cape to determine the applicability of environmental regulatory requirements.

OTHER ENVIRONMENTAL MANAGEMENT EXPERIENCE: POLICY / AUDITS / MANAGEMENT PLANS / STAKEHOLDER ENGAGEMENTS / REVIEWS

- Development of an Environmental Management Plan for a new integrated waste management facility for the V& A Waterfront, Cape Town
- Due Diligence Audits for a large agricultural corporation in Zambia (responsible for the environmental component as part of a multi-disciplinary team to support an application for international financing)
- City of Cape Town Waste Disposal and Handling Facilities – External Compliance Audits as part of a team of auditors
- Cape Town Film Studios – Construction Auditing for ongoing development on the property (2010 – 2013)
- Sun International – Joint responsibility for a Gap Analyses at all the facilities in Southern Africa
- Afrifresh Farms – Joint responsibility for a Due Diligence Audits on behalf of Standard Chartered Bank
- Development of an Environmental Management Plan for a new South Operations facility for the V& A Waterfront, Cape Town
- Fusion Leather – Due Diligence Audits on a new property in Atlantis (on behalf of a financial institution)
- Wild Coast Sun – Compilation of Management Plan and Construction Auditing for a Water Park and Fuel Storage Facilities
- The Boardwalk Hotel, Port Elizabeth – Construction Auditing
- NCP Chlorchem Atlantis Depot, Atlantis – Compilation of Management Plan and Construction Auditing
- Nyungwe Forest Lodge, Rwanda – On-site and remote Construction Auditing
- Bungalow Residence in Bakoven, Cape Town – Compilation of Management Plan and Construction Auditing and Part 1 Amendment Application
- Groot Moddergat Project, Hout Bay – Compilation of an Environmental Management Plan
- Sonnenhof Retirement Village, Cape Town – Construction Auditing
- The Upgrade of Strandfontein Road (M17), Phase 1 and 2 – Construction Auditing
- Kolkies en Karee Wind Energy Facility – responsible for the Afrikaans stakeholder engagement components
- Joint development of a Limited Environmental Management Framework for the Mosselbay Municipality
- Joint undertaking of the Coastal Access Audit and Pilot Study for the Overberg District Municipality with Errol Cerff and Erik Botha
- Facilitation of Estuarine Management Plan workshops, Western Cape – joint facilitation
- Wasteman South Africa – Joint responsibility for a Gap Analyses and Compliance Audits at all the facilities in South Africa
- De Oude Opstel and Sieraad, Robertson – Maintenance Management Plan
- Buhrein Fuel Service Station, Buhrein – Applicability Checklist
- Delft Fuel Service Station, Delft – Applicability Checklist
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- Sitari Fuel Service Station, Sitari – Applicability Checklist
- Vangate Fuel Service Station, Vangate – Applicability Checklist
- Eerste River Fuel Service Station, Eerste River – Applicability Checklist
- Vrede Farm, Piketberg – Applicability Checklist
- Cape St Martins, Britannia Bay on the West Coast – Rehabilitation Management Plan
- Aan De Wijnlanden Residential Development and Associated Infrastructure– External Compliance Audit Report
- King Air Warehousing, Industrial & Mixed-Use Business Development & Associated Infrastructure – External Compliance Audit Report
- 10MW Harmony Eland, Tshepong & Nyala Solar Energy Facilities & Associated Infrastructure, Free State Province – External Compliance Audit Reports
- Expansion of the Southern Oil Canola Oil Processing Plant, Moorreesburg – External Compliance Audit Report
- Kruispad, Montagu – Applicability Checklist
- Kensington Maitland Affordable Housing – Four Applicability Checklists
- Renewable Energy (Solar PV) Development and Associated Infrastructure on Remainder Erf 340 Mcgregor – Applicability Checklist
- Sunspot Solar PV Development on Portions of Remainder Farm Takapsvalley No 155, Robertson – Applicability Checklist
- For the Changes to an Existing Facility Located on Erf 37978 and the Establishment of a New Hot Dip Galvanising Facility and Associated Infrastructure on Erf No. 38674, Sacks Circle Bellville – External Compliance Audit Report
- South Africa Mainstream Renewable Power – Regulation 54 Compliance Audit Reports x five (5)
 - Loeriesfontein, Portion 1 and 2 of the Farm Aan De Karee Doorn Pan No. 213 Near Loeriesfontein, Northern Cape
 - Khobab, Remainder of the Farm Sous No. 226 Near Loeriesfontein, Northern Cape
 - Farm Kangnas (Farm No. 77, Portion 3) and Smorgenschaduwe (Remainder of Farm No. 127), Near Springbok, Northern Cape
 - Noupoort, within the Umsobomvu Local Municipality, Northern Cape
 - Perdekraal Site 2, Western Cape



Signature of the EAP: