



ARCUS

VOLUME I: PART II AMENDMENT REPORT

PROPOSED AMENDMENT OF THE AUTHORISED 300 MW PAULPUTS WIND ENERGY FACILITY AND ITS ASSOCIATED 132 kV GRID CONNECTION, NORTHERN CAPE PROVINCE (132 kV GRID CONNECTION FOR THE PAULPUTS NORTH WEF)

On behalf of

**PAULPUTS WIND ENERGY FACILITY NORTH (RF) (PTY)
LTD**

NOVEMBER 2021

**DFFE REFERENCE: 14/12/16/3/3/2/1120 and
14/12/16/3/3/2/1120/AM1**

FINAL FOR AUTHORITY DECISION



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PROJECT INFORMATION

DFFE Reference:	14/12/16/3/3/2/1120 and 14/12/16/3/3/2/1120/AM1
Arcus Reference:	3944 132 kV Grid Connection for Paulputs North WEF Amendment
Project Title:	Part II Amendment of the Authorised 300 MW Paulputs Wind Energy Facility and its associated 132 kV Grid Connection, Northern Cape Province – 132 kV Grid Connection for Paulputs North WEF.
Project Director:	Ashlin Bodasing - Arcus Consultancy Services South Africa (Pty) Ltd
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Specialist Project Team:	Dr Owen Davies - Arcus Consultancy Services South Africa (Pty) Ltd Dr Brian Colloty - Enviro Sci. (Pty) Ltd Jayson Orton - ASHA Consulting (Pty) Ltd Johann Lanz - Independent Consultant Jamie Pots - Independent Consultant Stephen Fautley - Techso (Pty) Ltd Alan Moore - Arcus Consulting Ltd Leandri Kruger - Independent Consultant Kerry Schwartz - SiVEST SA (Pty) Ltd Michael Brits - Arcus Consultancy Services South Africa (Pty) Ltd Jonathan Aronson - Arcus Consultancy Services South Africa (Pty) Ltd
Project Applicant:	Paulputs Wind Energy Facility North (RF) (Pty) Ltd
Report Status:	Final for Authority Decision

¹ Ashleigh von der Heyden is on maternity leave and Ashlin Bodasing has amended and updated the final report.

CHANGES MADE TO VOLUME I FROM DRAFT TO FINAL

Changes made from Draft to Final version of Volume I	Section
Date changed to November 2021	Headers, Footers, Cover Page of the Final Amendment, EMPr and Public Participation Report.
Typographical and formatting corrections	Throughout the Final Amendment, EMPr and Public Participation Report.
The word draft was removed throughout where applicable.	Throughout the Final Amendment, EMPr and Public Participation Report.
Added Table with Comments received from DFFE on the Draft Amendment Report and EAP responses.	Final Amendment Report: Section 1.4.
Distance of the authorised Paulputs WEF and Grid Connection to Pofadder amended to 35 km.	Final Amendment Report: - Footnote 3, Section 2. - Section 3, Table 3.3.
Section 3 of the Final Amendment Report amended to show conditions of the EA to be retained, changed or removed based on DFFE comments.	Final Amendment Report: Section 3.
Conclusions and Recommendations updated to remove conditions that are already contained within the approved EA.	Final Amendment Report: Section 11.
Change to the size of the temporary storage area as a typo from 1.5 Ha to 1 Ha as per the approved EA.	Final Amendment Report: Section 3, Table 3.3.
The generic EMPr was removed and an EMPr as derived from Paulputs North WEF EMPr (which was made available for PPP) has been appended to this Final Amendment Report. Reference to the Paulputs North WEF was removed and the EMPr is specific to the Paulputs North WEF Grid Connection.	Appendix B: EMPr.
The Comments & Responses Report was updated to present the PPP conducted to date, as well as all comments received and responses given.	Appendix C: PP Report.

Note: No changes were made to Volume II: Specialist Amendment Reports / Letters from the draft to final stage of the application process.

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VOLUME II: SPECIALIST REPORTS AND SITE VERIFICATION LETTERS

ABBREVIATIONS, ACRONYMS AND UNITS

BESS	Battery Energy Storage System	MSA	Middle Stone Age
CA	Competent Authority	MTS	Main Transmission Substation
CAA	Civil Aviation Authority	MW	Megawatt
CARA	Conservation of Agricultural Resources, 1983 (Act No. 43 of 1983)	NaS	Sodium Sulphur
CBA	Critical Biodiversity Area	NDP	National Development Plan
DFFE	Department of Environment Forestry and Fisheries (National)	NEMA	National Environmental Management Act, 1998 (Act No. 107 of 1998)
DMRE	Department of Mineral Resources	NEMBA	National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)
DoE	Department of Energy	NFEPA	National Freshwater Ecosystem Priority Area
EA	Environmental Authorisation	NHRA	National Heritage Resources Act, 1999 (Act No. 25 of 1999)
EAP	Environmental Assessment Practitioner	NPAES	National Parks Area Expansion Strategy
ECA	Environment Conservation Act, 1989 No. 73 of 1989)	NWA	National Water Act, 1998 (Act No. 36 of 1998)
EGI	Electricity Grid Infrastructure	PES	Present Ecological State
EIA	Environmental Impact Assessment	PGDS	Provincial Growth and Development Strategy
EMF	Environmental Management Framework	PPP	Public Participation Process
EMPr	Environmental Management Programme	REIPPPP	Renewable Energy Independent Power Producer Procurement Programme
ESA	Ecological Support Area	S&EIA	Scoping and Environmental Impact Assessment
ESA	Early Stone Age	SABAAP	South African Bat Assessment Advisory Panel
ESKOM	Eskom Holdings SOC Limited	SAHRA	South African Heritage Resources Agency
EWT	Endangered Wildlife Trust	SANBI	South African National Biodiversity Institute
ft	Measurement: foot	SANRAL	South African National Roads Agency Limited
GN	Government Notice	SANS	South African National Standards
GNR	Government Notice Regulation	SCADA	Supervisory Control and Data Acquisition
Ha	Hectares	SDF	Spatial Development Framework
HIA	Heritage Impact Assessment	SEA	Strategic Environmental Assessment
I&AP	Interested and Affected Party	SIA	Social Impact Assessment
IDP	Integrated Development Plan	WEF	Wind Energy Facility
IPP	Independent Power Producer		
IRP	Integrated Resource Plan		
kV	Kilovolt		
kWh	Kilowatt Hours		
Li-ion	Lithium Ion		
LSA	Late Stone Age		

EXECUTIVE SUMMARY

Paulputs Wind Energy Facility (RF) (Pty) Ltd ('PWEF'), a wholly owned subsidiary of WKN Windcurrent SA (Pty) Ltd, was granted environmental authorisation for the 300 MW (75 Turbine) Paulputs Wind Energy Facility (WEF) and its associated 132 kV grid connection on 11 December 2019 by the Department of Forestry, Fisheries and Environment (DFFE) (DFFE Reference 14/12/16/3/3/2/1120) (Figure 1). PWEF are proposing to give permission to Paulputs Wind Energy Facility North (RF) (Pty) Ltd and Paulputs Wind Energy Facility South (RF) (Pty) Ltd to **split and amend** the Environmental Authorisation (EA).

An overview of the total applied amendments for the Paulputs WEF EA, as submitted in the Application to the DFFE, is provided below for contextual purposes:

- **Amendment 1: Paulputs South WEF** (subject to a separate report and assessment): Paulputs Wind Energy Facility South ('Paulputs South') will consist of a 150 MW facility with up to 35 turbines, with a hub height of up to 180 m, blade length of up to 110 m and a rotor diameter of up to 220 m. All infrastructure is to be located to the east of the N14 Highway (within the authorised development footprint).
- **Amendment 2: Paulputs North WEF** (subject to a separate report and assessment): Paulputs Wind Energy Facility North (RF) (Pty) Ltd ('Paulputs North') will consist of a 150 MW Facility with up to 40 turbines, with a hub height of up to 180 m, blade length of up to 110 m and a rotor diameter of up to 220 m. The authorised substation will be included within this development and will include a Battery Energy Storage System, which will be housed within the approved temporary laydown area. All infrastructure (turbines, substation, BESS, etc.) will be located to the west of the N14 Highway (within the authorised development footprint).
- **Amendment 3: Paulputs North WEF Grid Connection (the 'proposed amendment 3' – this report):** PWEF is applying for permission to remove (from its EA) and transfer the rights and ownership of the authorised 132 kV Grid Connection (Option C) to Paulputs Wind Energy Facility North (RF) (Pty) Ltd. The approved grid connection will be taken over by Eskom in the future and thus requires a separate Environmental Authorisation. The grid connection description as authorised will not change.

The focus of this amendment report is on the Paulputs North WEF Grid Connection Application.

This proposed amendment application was submitted to the DFFE (the Competent Authority) and is summarised below:

Table 1: Short Summary of the Amendments Proposed to the Authorised 300 MW Paulputs WEF applicable to the Paulputs North WEF Grid Connection

	Authorised	Amendment
Holder of Authorisation	Paulputs Wind Energy Facility (Pty) Ltd	Paulputs Wind Energy Facility North (RF) (Pty) Ltd
Name and Capacity of the Development	The 300 MW Paulputs Wind Energy Facility (WEF) and associated 132 kV Grid Connection, Northern Cape Province.	132 kV Grid Connection for the Paulputs North Wind Energy Facility, Northern Cape Province.
Scope	Megawatt Capacity of 300 MW	Not included in this Split of the EA (refer to Amendment 1 and 2).

	Authorised	Amendment
	75 Turbine Wind Turbine Generators.	Not included in this Split of the EA (refer to Amendment 1 and 2).
	Grid Connection Infrastructure: Single Circuit, 132kV Grid Connection.	Grid Connection Infrastructure: Double Circuit, loop-in and loop-out, 132 kV Grid Connection
	132 kV on-site Substation	Not included in this Split of the EA (refer to Amendment 2).

The location and technical details of the Paulputs North WEF Grid Connection are shown in Table II below.

Table II: Co-ordinates of the Paulputs North WEF Grid Connection

Reference Point	Latitude	Longitude
Paulputs North WEF 132 kV Grid Connection		
Start	28°58'21" S	19°45'33" E
Middle	28°53'24" S	19°41'27" E
End	28°50'45" S	19°41'43" E
Location of the site	35 km northeast of Pofadder, Northern Cape Province. Ward 1 of the Khai Ma Local Municipality of DC6 – Namakwa District Municipality.	
Farm and SG Codes	Scuitklip 92/2 Scuitklip 92/3 Scuitklip 92/5	C0360000000009200002 C0360000000009200003 C0360000000009200005
Component	Description/Dimensions	
Paulputs Grid Connection Technical Specifications		
Height of pylons	Maximum of 30 m high	
Length of transmission line	Maximum 12.5 km	
Types of poles used	Both monopoles and lattice structures are being considered	
Area occupied by pylon servitude	Width 31 m x 12.5 km = 39 hectares	
Transmission capacity	132 kV line, evacuating a maximum of 300 MW	
Area occupied by both permanent and construction laydown areas	Laydown areas used are the same as for the Paulputs North WEF	
Area occupied by buildings	The O&M complex will form part of the Paulputs North WEF on-site 200 m x 200 m substation compound	
Length of service road	26.8 km (worst case scenario)	
Width of service road	3 – 6 m wide	
Height of fencing	Maximum 3 m only around on-site substation and buildings	
Type of fencing	Wired mesh / chain link fence not electrified	

The Paulputs WEF is authorised for the maximum height to tip of the blade of 230 m, with a hub height of up to 140 m, a rotor diameter of up to 180 m and a blade length of

up to 90 m. For this amendment, Paulputs North seek authorisation to remove (from its EA) and transfer the rights and ownership of the authorised 132 kV Grid Connection to Paulputs Wind Energy Facility North (RF) (Pty) Ltd. The approved grid connection will be taken over by Eskom in the future and thus requires a separate Environmental Authorisation. The grid connection description as authorised will not change.

LEGISLATIVE REQUIREMENTS

This report has been compiled to comply with regulation 32(1)a of the NEMA, 1998 EIA regulations, 2014, as amended and Regulation 660 in terms of the Disaster Management Act, 2002. This amendment assessment report has been compiled to assess the removal of the authorised 132 kV Grid Connection (Option C) from its authorisation in favour of use for the Paulputs North WEF. The approved grid connection will be taken over by ESKOM in the future and thus requires its own Environmental Authorisation. Key inclusions in this amendment assessment report are as follow:

1. Statements from specialists confirming whether or not the proposed amendment will change the nature or impact of any of the impacts that were assessed as part of specialist studies for the authorised Paulputs WEF (2019). *These specialists' statements are included in Volume II.*
2. Statements from specialists to confirm whether or not the proposed amendment within the assessed footprint will result in any additional impacts. *Included in Volume II.*
3. Statements from specialists to confirm whether any additional management actions or mitigations are applicable to the proposed amendments. *Included in Volume II.*
4. An EMPr derived from the original Paulputs EMPr has been appended to the Volume I (Appendix B) and made specific to the Grid Connection. The EMPr includes additional management outcomes and actions associated with the grid connection.

The draft report was made available for public and stakeholder comment and review for a period of 30 days, from the 02 August 2021 to the 01 September 2021 (both days inclusive) (see Appendix C – Public Participation Report). The below parties received notification of the availability of the draft amendment assessment report:

- (a) The Competent Authority;
- (b) Each organ of state department that administers a law relating to a matter affecting the environment relevant to an application for the amendment of an environmental authorisation;
- (c) all organs of state which have jurisdiction in respect of the activity to which the application for amendment relates;
- (d) all I&AP's that were registered as part of the original EIA process;
- (e) all I&AP's that were registered on other EIA's that took place on the same properties; and
- (f) all neighbouring property owners.

PROJECT TEAM

Environmental Project Team:

Name of practitioner	Ms Ashlin Bodasing
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Designation	Project Director and EAP ²
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Name of practitioner	Mrs Ashleigh von der Heyden
Designation	Project Manager and EAP
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Specialist Project Team:

The majority of the same specialists were commissioned for this amendment report, with the exception of the Avifaunal and Ecology specialists.

The original Avifaunal specialist for the approved Paulputs WEF EIA was undertaken by Andrew Pearson who no longer conducts avifaunal specialist studies. Dr Owen Davies was appointed as the new specialist and undertook an additional site visit in February 2020 to verify the information contained in the approved Paulputs WEF Avifaunal specialist report and to inform the amendment application. Dr Davies' avifaunal report and site verification report are contained in Volume II of this report.

Simon Todd of 3Foxes Biodiversity Consulting undertook the original ecology study for the Paulputs WEF. Mr Todd did not have capacity to provide assessment during the time of reporting. Mr Jamie Pote was appointed as the new specialist and undertook a site visit in June 2021, during the early winter months to verify the information contained in the approved Paulputs WEF Terrestrial Biodiversity, including Flora and Fauna, specialist report and to inform the amendment application. Mr Potes' Compliance Statements and site verification reports are contained in Volume II of this report.

SUMMARY OF SPECIALIST IMPACT STATEMENT

- **Aquatic Amendment Assessment** – No additional impacts. Further, no changes to the original mitigations or EMPr recommendations are required.
- **Avifaunal Amendment Assessment** - As this is largely an administrative exercise to ease the transfer of ownership to Eskom, thus this amendment has no significance from an avifaunal perspective and will not result in any changes to the impacts assessed for the original authorisation.
- **Terrestrial Ecology Amendment Assessment** – The Paulputs North Grid Connection will occupy the same footprint between the site and the substation to the north-east and will not result in a significant change to the overall impact to terrestrial biodiversity. In terms of the overall impact, there are no changes in the impacts associated with the single Paulputs WEF and the impacts associated with the combined split North, North Grid and South WEF components.
- **Bat Amendment Assessment** - As this is largely an administrative exercise to ease the transfer of ownership to Eskom, thus this amendment has no significance from a bat perspective and will not result in any changes to the impacts assessed for the original authorisation.
- **Soil, Land Use and Agricultural Potential Amendment Assessment** - There are no agricultural impacts related to this proposed amendment. In addition, there

² Mrs. Ashleigh von der Heyden is on maternity leave and the Final Reports were signed off by the EAP Ashlin Bodasing.

are no agricultural advantages or disadvantages related to it. The proposed amendment does not require any changes or additions to the mitigation measures for agricultural impacts that were recommended for the authorised Paulputs WEF.

- **Heritage and Palaeontology Amendment Assessment** - On the basis of the archaeology seen in the Paulputs North WEF site and of other sites known by the author to occur in the wider area, it is unlikely that the power line construction would result in a change in impacts. Impacts remain valid from the authorised Paulputs WEF EIA and are no more than medium intensity.
- **Visual Amendment Assessment** – As this is merely an administrative issue, the proposed amendment has no significance from a visual perspective and will not result in any changes to the visual impacts identified in the original VIA for authorised Paulputs WEF.
- **Noise Amendment Assessment** - As this is merely an administrative issue, the proposed amendment has no significance from a noise perspective and will not result in any changes to the noise impacts identified in the original noise impact assessment for authorised Paulputs WEF.
- **Social Amendment Assessment** - The proposed amendment will not result in any additional impacts, cumulative impacts or residual impact, nor will it change the significance of these impacts. The Paulputs North Grid connection must ensure compliance with the recommendations of Section 4 of the approved SIA for the Paulputs WEF.
- **Traffic Amendment Assessment** – The proposed amendment does not change the Traffic Specialist Report findings and recommendations as stated in the authorised Paulputs WEF EIA. A transport management plan must be compiled and must consider the logistics of transporting abnormal loads to site. This plan must be compiled after preferred bidder is awarded.

CONCLUSION

This amendment application is being undertaken to identify and assess environmental impacts, issues and concerns that may result from the proposed amendment to the Environmental Authorisation. The information contained in this report will enable the DFFE to make an informed decision to grant or deny the proposed Environmental Amendment Application.

It is the opinion of the EAP that the proposed project amendment will not affect any change in the impact ratings from those which were assessed during the Paulputs WEF EIA undertaken by Arcus in August 2019.

The **proposed amendment can be authorised** subject to Paulputs North (the applicant) adhering to all mitigation and management measures outlined in this final amendment report, the approved Paulputs WEF EIA (2019) and the Paulputs North WEF Grid Connection EMPr.

1 INTRODUCTION

Paulputs Wind Energy Facility (RF) (Pty) Ltd ('PWEF'), a wholly owned subsidiary of WKN Windcurrent SA (Pty) Ltd, was granted environmental authorisation for the 300 MW (75 Turbine) Paulputs Wind Energy Facility (WEF) and its associated 132 kV grid connection on 11 December 2019 by the Department of Forestry, Fisheries and Environment (DFFE) (DFFE Reference 14/12/16/3/3/2/1120) (Figure 1). PWEF are proposing to give permission to Paulputs Wind Energy Facility North (RF) (Pty) Ltd and Paulputs Wind Energy Facility South (RF) (Pty) Ltd to **split and amend** the Environmental Authorisation (EA).

An overview of the total applied amendments for the Paulputs WEF EA, as submitted in the Application to the DFFE, is provided below for contextual purposes:

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The focus of this amendment report is on the Paulputs North WEF Grid Connection Application.

As the proposed amendments require Environmental Authorisation (EA) from the Department of Forestry, Fisheries and Environment (acting as the Competent Authority (CA)), Paulputs Wind Energy Facility North (RF) (Pty) Ltd ('Paulputs North') appointed Arcus Consultancy Services South Africa (Pty) Ltd ('Arcus') as the project manager and independent environmental consulting firm to undertake the necessary Part II Amendment Application.

1.1 Objectives of this Amendment Report

The proposed amendment aims to identify and assess the potential change in the significance of impacts associated with amending the specifications, as well as amend the conditions of approval obtained for the authorised Paulputs WEF. The findings, including specialist findings, are used by the EAP, Applicant (Paulputs North) and Authorities to obtain an objective view of the potential environmental and social impacts that may/may not arise during the construction, operation and decommissioning of the proposed amendment and its associated infrastructure. Aligned to the '*One Environmental System*', this amendment report has been compiled with the following objectives:

The Report Objectives

- To provide the project's I&APs, stakeholders, commenting authorities and the competent authority (CA), with a thorough project description and amendment process description.
- To maintain cordial relationships with local residents, authorities and other stakeholders via sustained open communication.
- To determine the policy and legislative context within which the proposed activity is undertaken and how the activity complies with and responds to the policy and legislative context.
- To provide an objective assessment of the preferred amendment option/s.
- To address the advantages and disadvantages of the proposed amendments through assessing the need and desirability of the project as well as the proposed project impacts.

1.2 Assumptions and Limitations

The following assumptions and limitations are applicable to the proposed amendment:

- The information on which this report is based (baseline studies and project information, as well as existing information) is accurate and correct.
- The assumptions and limitations presented in each specialist report (Volume II of this report) are noted for the amendment report.
- It is assumed that all information provided by the applicant and I&APs to the project team was correct and valid at the time it was provided.
- The recommendations derived from this report would be included in all tender documentation/bidding documentation and the EMPr for implementation.
- It should be emphasised that information, as presented in this amendment report, only has reference to the study area (Paulputs North WEF Grid Connection) as indicated on the accompanying figures. Therefore, this information cannot be applied to any other area without detailed investigation.

1.3 Details of EAP and Specialists

As a specialist renewable energy consulting firm, Arcus is a leader in providing environmental and social consulting, advisory and management services. Arcus provides a turn-key consulting service and has considerable experience in renewable energy developments; from site identification and feasibility through to impact assessment and the construction and operational phases.

Based in the United Kingdom and South Africa (Cape Town), our teams have worked on more than 250 renewable energy projects across the world and are highly trained in various environmental disciplines, with significant hands-on experience in an array of projects across various industries.

Arcus focuses on collaborating with the developer to deliver the most cost effective and least impacting project design that meets the needs for future generations. Arcus adopt a communicative and quality-based approach for all projects and have been certified in terms of the Quality Management System ISO 9001 standard for the past four years. This system provides tools, control measures and guidelines for reporting, data management, equipment calibration and management, timeline management, map production and overall project management.

1.3.1 Expertise of the EAP

Ashlin Bodasing (Project Director and EAP) is a Technical Director at Arcus. Ashlin is the Project Director and is responsible for the overall direction of the project and ensure that all legal requirements are met. Ashlin is a registered EAP with EAPASA (2020/780). Having obtained her Bachelor of Social Science Degree (Geography and

Environmental Management) from the University of Kwa-Zulu Natal; she has over 16 years' experience in the environmental consulting industry in southern Africa. Ashlin has excellent Project Management experience and has gained major project experience in the development of Environmental Impact Assessments, Environmental Management Plans and the monitoring of construction activities. Her areas of expertise include project management, environmental scoping and impact assessments, environmental management plans, environmental compliance monitoring and environmental feasibility studies, and environmental due diligence reviews.

Ashleigh von der Heyden (Project Manager and EAP) is a Senior Environmental Consultant at Arcus, Cape Town. She is a registered SACNASP Environmental Consultant with 5.5 years working experience in the environmental sector, namely the Renewable Energy and Mining sectors. In addition, she has international reporting experience for the International Finance Corporation (IFC) and Equator Principles (EP) Performance Standards and the World Bank Environmental Guidelines. Ashleigh has a proven track record in managing environmental projects to the required quality standards, timeframes and budgets. Her core responsibilities include client management and project implementation, reporting and execution. Her day-to-day responsibilities include report review, stakeholder engagement and business development.

Ashleigh completed her BSc (Hons) in Conservation Ecology at the University of Stellenbosch and is currently completing her MSc in Environmental Sciences. She is a member of the Soil Science Society of South Africa (SSSSA) and is completing her Project Management Professional (PMP) Certification through the Project Management Institute (PMI).

1.3.2 Specialist Team Members

The majority of the same specialists were commissioned for this amendment report, with exception of the Avifaunal study (Table 1-1).

The original Avifaunal specialist for the approved Paulputs WEF EIA was undertaken by Andrew Pearson who no longer conducts avifaunal specialist studies. Dr Owen Davies was appointed as the new specialist and undertook an additional site visit in February 2020 to verify the information contained in the approved Paulputs WEF Avifaunal specialist report and to inform the amendment application. Dr Davies' avifaunal report and site verification report are contained in Volume II of this report.

Simon Todd of 3Foxes Biodiversity Consulting undertook the original ecology study for the Paulputs WEF. Mr Todd did not have capacity to provide assessment during the time of reporting. Mr Jamie Pote was appointed as the new specialist and undertook a site visit in June 2021, during the early winter months to verify the information contained in the approved Paulputs WEF Terrestrial Biodiversity, including Flora and Fauna, specialist report and to inform the amendment application. Mr Potes' Compliance Statements and site verification reports are contained in Volume II of this report.

Table 1-1: Details of the Specialist Project Team

Technical Discipline	Lead Specialist	Specialist Organisation
Avifauna	Dr Owen Davies	Arcus Consultancy Services SA (Pty Ltd)
Bats	Jonathan Aronson Michael Brits	Arcus Consultancy Services SA (Pty Ltd)
Terrestrial Ecology (Flora and Fauna)	Jamie Pote	Independent Consultant
Soil, land use and agricultural potential	Johann Lanz	Independent Consultant

Aquatic / Freshwater	Dr Brian Colloty	Enviro Sci. Pty Ltd
Heritage, Archaeology and Palaeontology	Jayson Orton	ASHA Consulting
Socio-Economic	Leandri Kruger	Independent Consultant
Noise	Alan Moore	Arcus Consulting Ltd
Visual and Landscape	Kerry Schwartz	SiVest
Traffic and transportation	Stephen Fautley	Techso (Pty) Ltd

1.4 DFFE Comments on the Draft Amendment Report

The table below (Table 1-2) lists the comments made by the DFFE, on the Draft Amendment Report (DAR). It must be noted that the comments provided below is applicable to the Draft Amendment Report of all three Amendments being applied for, i.e., Paulputs North WEF Grid Connection (this report); Paulputs North WEF (separate report); and the Paulputs South WEF (separate report). The comments have been addressed in this Final Amendment Report (FAR) as applicable.

Table 1-2: DFFE Comments on the Draft Amendment Report

No.	Comment from DFFE	EAP Response	Section in the Final AR
<p>COMMENTS ON THE APPLICATION FOR AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION ISSUED ON 11 DECEMBER 2019 FOR THE 300 MW PAULPUTS WIND ENERGY FACILITY (WEF) AND ASSOCIATED 132 kV GRID CONNECTION, NORTHERN CAPE PROVINCE</p> <p>The Environmental Authorisation (EA) for the above-mentioned project dated 11 December 2019, the application for amendment of the EA and the draft motivation report received by the Department on 05 August 2021 and the acknowledgement letter dated 11 August 2021, refer.</p> <p>This letter serves to inform you that the following information must be included to the final Motivation Report:</p>			
<p>Application Form</p>			
1	Ensure that all amendments to the EA are applied for and provided in section 6 on page 8 of 13 of the application form (e.g. the inclusion of Battery Energy Storage System in Paulputs North Wind Energy Facility) including the conditions to be removed with reasons for each amendment.	<p>The Application Form has been amended / updated and is being submitted with the final motivational report.</p> <p>A matrix detailing the required amendments as well as reasons for the proposed amendments has been appended to the application form. Refer to Appendix 8 of the Application Form.</p>	Amended / Updated Application Form submitted with the Final Amendment Report.
2	In addition, please ensure that the amendments applied for in the application form are the same as the amendments described in the final Motivation report.	The amendments applied for in the application form (as included in the amended / updated application form and appended matrix) has been updated in the Final Motivation Report.	Amended / Updated Application Form Volume I: Final Amendment Report
3	You are advised to submit separate application forms for each facility (i.e., Paulputs North and South) indicating the proposed amendment i.e. relevant component and its capacity, what has been removed, what has been approved and the amendments as	The EAP confirmed this request with the relevant case officer and it was confirmed that the submission of separate application forms are not required. A single Amended / Updated application form with separate	Amended / Updated Application Form submitted with the Final Amendment Report.

No.	Comment from DFFE	EAP Response	Section in the Final AR
	well as reason for each amendment.	payments has been submitted with the Final Amendment Report.	
4	It has been noted that the proposed amendment 3 in the application form on page 8 refer to 132 kV grid connection while on page v of the motivational report, it has been indicated that this component would be removed. Please clarify that and ensure the proposed amendment are the same in both the application form and motivational report.	<p>A single application form has been submitted with three separate Final Amendment Reports.</p> <p>Paulputs Wind Energy Facility (RF) (Pty) Ltd are proposing to give permission to Paulputs Wind Energy Facility North (RF) (Pty) Ltd and Paulputs Wind Energy Facility South (Pty) Ltd to split and amend the Environmental Authorisation (EA) into three amendment applications for EA.</p> <p>Amendment 3 as stated in the Application Form must be read in conjunction with the Motivational (Final Amendment) Report titled: "132 kV Grid Connection for the Paulputs North WEF" and not the Motivational Report titled: "Paulputs North WEF".</p> <p>The approved grid connection will be taken over by Eskom in the future and thus requires its own Environmental Authorisation, hence it has been split from the original EA.</p>	Volume I: Final Amendment Report
5	The Department has noted that a certified EA or an affidavit that explains the unavailability of a certified EA is not appended to the application form. Therefore, you are required to provide certified EA or an original commissioned Affidavit/Affirmation under oath undertaken by the applicant and must be appended to the application form.	A certified EA has been appended to the Amended / Updated Application Form.	Amended / Updated Application Form
6	Provide a letters of acceptance of responsibilities and obligations of the EA by the new holders of the requested resultant three EAs.	Letters were included in as Appendix 8 in the Application Form submitted with the Draft Amendment Report. These have been	Amended / Updated Application Form

No.	Comment from DFFE	EAP Response	Section in the Final AR
		included again as Appendix 7 in the Amended / Updated Application Form.	
Draft Motivational Report			
7	You are advised to submit separate final amendment report for each facility (i.e. Paulput North and South) indicating the proposed amendment, potential impacts as a result of the amendments and its assessment, inputs from the specialists and their recommendations, etc.	<p>Separate reports for each facility has been submitted, which includes the proposed amendments, potential impacts as a result of the amendments and its assessment, inputs from the specialists and their recommendations, etc.</p> <p>Separate reports were subjected to a Public Participation Process from 02 August 2021 to 01 September 2021 (both days inclusive). These reports have been updated from 'Draft' to 'Final' and the changes from 'Draft' to 'Final' have been reflected on Page ii of each Final Motivational / Amendment Report.</p>	Volume I: Final Amendment Report
8	It has been mentioned on page 11 of the motivational report for Paulputs North that there is uncertainty regarding the preferred BESS choice and different BESS technology has been considered. You are advised to indicate the preferred BESS technology in the final amendment report as well as the description of the impacts assessment and how such impacts would be mitigated.	The Final Motivational / Amendment Report for Paulputs North WEF has been updated to reflect the preferred BESS technology (Section 3.2.2) and impact assessment of the BESS technology (Section 9 – 11).	Amendment 2: Volume I: Final Amendment Report of the Report titled: "Paulputs North WEF"
9	On page 4 of the draft motivation reports (Paulputs North WEF, South WEF and Paulputs North WEF grid connection) it is stated that authorised Paulputs WEF, grid connection and substation was proposed to be located approximately 35km north-east of Pofadder while in the EA it is stated that the site is located 50km from north east of Pofadder. Please note that any change in detail in the EA must be applied for and a motivation for that amendment must be provided. Therefore, you are required to provide the correct details (distance) in the final amendment report taking into consideration the information in the EA and the FEIAR. In addition, amendment of such must be included in the	<p>The respective amendment has been added to the Amended / Updated Application Form, and is contained within the Matrix (Appendix 8 of the Application Form). Changes are now reflected in both the Amended / Updated Application form as well as corresponding Final Motivational / Amendment Reports.</p> <p>Reasons for the changes to the distance as were indicated in the draft motivation reports (Paulputs North WEF, South WEF and</p>	<p>Amended / Updated Application Form</p> <p>Volume I: Final Amendment Report</p>

No.	Comment from DFFE	EAP Response	Section in the Final AR
	amendment application if the information is incorrect.	Paulputs North WEF Grid Connection) is that the approved EIA and subsequent EA incorrectly represented the true distance of the facility (300 MW Paulputs Wind Energy Facility) to Pofadder at being 50 km away. This has been corrected to be more specific (35 km) in terms of the distance from the town of Pofadder to the facility, in the draft motivation reports (Paulputs North WEF, South WEF and Paulputs North WEF Grid Connection), and carried through to the Final Motivational / Amendment Reports.	
10	You are required to provide all the details of the original EA that relates to each of the splits and ensure that correct details of the EA are provided in the relevant splits.	The Amended / Updated Application Form has been amended/updated and is being submitted with the final motivational reports. Separate matrix letters detailing the required amendments as well as reasons for the proposed amendments has been appended to the Amended / Updated Application Form. Refer to Appendix 8 of the Amended / Updated Application Form. Changes are now reflected in both the Amended / Updated Application form as well as corresponding Final Motivational / Amendment Reports.	Amended / Updated Application Form Volume I: Final Amendment Report
11	Furthermore, ensure that the total area of the development sites of the three splits tallies with the area of the development site as authorised in the EA.	These changes are now reflected in both the Amended / Updated Application form as well as corresponding Final Motivational / Amendment Reports.	Amended / Updated Application Form Volume I: Final Amendment Report
12	Ensure that all the properties affected by the authorised development are reflected correctly in relation to amendment 2 on page 6 of the Paulputs North WEF grid connection amendment	All the properties affected by the authorised development are reflected correctly in relation to each proposed amendment.	Amended / Updated Application Form

No.	Comment from DFFE	EAP Response	Section in the Final AR
	report and page 7 of both Paulputs South and North WEF reports.	Properties as contained in the Application Form submitted with the Draft motivational report and Draft Motivational / Amendment Reports remain unchanged in the Amended / Updated Application and Final Motivational / Amendment Reports.	Volume I: Final Amendment Report
13	It is indicated on page 9 of the draft motivation report (Paulputs North WEF) that the BESS will occupy temporary lay down area of 1,5ha whereas in the EA the laydown area is 1ha, please explain this discrepancy. The motivational report on page 1 indicated that the BESS will be located in the area authorised for temporary laydown. Therefore, you are advised to amend this and ensure the BESS located is shown on the final layout for this facility in relation to the approved laydown area location.	This was a typographical error of the EAP. The authorised area of 1 Ha for temporary storage will be occupied by the BESS. This change has been reflected in both the Amended / Updated Application form as well as corresponding Final Motivational / Amendment Report. The location of the BESS is shown on Updated Figure 3.	Amended / Updated Application Form Amendment 2: Volume I: Final Amendment Report of the Report titled: "Paulputs North WEF"
14	You are required to confirm whether or not the double circuit 132 kV loop in loop out grid connection was assessed in the original EIA and is located within the assessed 300m corridor. Furthermore, you are required to indicate if there would be additional impacts as a result of this.	A single circuit 132 kV grid connection was assessed as part of the approved EIA/EMPr. This grid connection was assessed by specialists for a 300m wide corridor (150 m on either side of the overhead powerline). The proposed amendment to a 132 kV Double Circuit loop in loop out grid connection has been assessed by the specialists and EAP. This line does not deviate from that which was approved and will be contained within the 300 m corridor previously assessed by specialists. No additional impacts are expected. By making this change from single circuit to double circuit, does not change the capacity of the connection, nor does it require any additional footprint. Therefore, the change does not trigger any listed activity nor does it trigger any additional impacts.	Volume I: Final Amendment Report Volume II: Proposed Amendment Specialist Studies

No.	Comment from DFFE	EAP Response	Section in the Final AR
15	On page 9 of the grid connection amendment report, you have included a 300m corridor. Please confirm whether the original EIA assessment assessed 300m corridor and refer to the relevant pages in the initial reports. Ensure that any change in the detail of the original EA is applied for and a motivation is provided for that change and an indication of the assessment of such. If not assessed, you are advised to verify if the changes would not trigger a listed activity in order to obtain authorisation through the correct process.	<p>The original EIA assessed a 300 m wide corridor (Reference: Final EIAR, Arcus, August 2019, Page ii; 10; 16; 106; and 114).</p> <p>An extract from the original EIA reads: <i>"Internal reticulation between onsite substation Option A and Option C is approximately 6.5 km of overhead powerlines, assessed as a 300 m wide corridor by the specialists."</i></p> <p>In conclusion, this 300 m corridor was assessed during the original EIA and Amendment process and no Listed Activities are triggered.</p>	<p>Volume I: Final Amendment Report</p> <p>Volume II: Proposed Amendment Specialist Studies</p>
16	Ensure that amendment 3 on page 8 of the amendment report (Paulputs North WEF) is stated correctly.	<p>The amendment details for Amendment 3 were removed from the Paulputs North WEF amendment report.</p> <p>The Amended / Updated Application Form and Final Amendment Report for the Paulputs WEF North Grid Connection states the Amendment details correctly.</p>	<p>Volume I: Final Amendment Report</p> <p>Amendment 2: Volume I: Final Amendment Report of the Report titled: "Paulputs North WEF"</p> <p>Amended / Updated Application Form</p>
17	It has been noted on page 48-49 of the reports (Paulputs North WEF and South WEF) that you have recommended inclusion of conditions to the EAs, you are required to provide a motivation for inclusion of these conditions to the EA.	A motivation for the inclusion of these conditions into the EA has been included in the respective Final Motivational / Amendment Reports.	Volume I: Final Amendment Report
18	The Department has noted on page 16 of the reports (Paulputs North and South WEF) that you are requesting condition 13 of the EA to be retained in the resultant splits (Paulputs North WEF and South WEF) but condition 14 and 15 to be removed from the EA. Please note that the three conditions are linked, therefore all three conditions must be complied with prior to the approval of the	The EAP is in agreement with the DFFE. The EAP has thus amended the Final Amendment Report(s) to reflect that Condition 13, 14 and 15 be retained as is in the new EA/s (see Section 3, Table 3-3 in the respective Final Amendment Reports).	<p>Volume I: Final Amendment Report</p> <p>Amended / Updated Application Form</p>

No.	Comment from DFFE	EAP Response	Section in the Final AR
	EMPr.	In addition, the Application Form has been amended/updated and is being submitted with the final motivational reports. A matrix detailing the required amendments as well as reasons for the proposed amendments has been appended to the application form for each amendment. Refer to Appendix 8 of the Amended / Updated Application Form.	
19	You have requested the deletion of condition 19-20, please confirm whether an audit report has been compiled for this development as these conditions require a compilation of an audit report and condition 21 22 and 23 are linked to the two aforementioned conditions. In addition, it must be noted that if the audit was undertaken, it was for facility prior the splitting, therefore, this should be communicated and agreed with the relevant authority undertaking the audit of the development prior removing such conditions.	<p>The EAP confirms that no audit report has been conducted. The EAP has thus amended the Final Amendment Report(s) to reflect that Condition 19 - 23 be retained as is in the new EA/s (see Section 3, Table 3-3 in the respective Final Amendment Reports).</p> <p>In addition, the Application Form has been amended/updated and is being submitted with the final motivational reports. A matrix detailing the required amendments as well as reasons for the proposed amendments has been appended to the application form for each amendment. Refer to Appendix 8 of the Amended / Updated Application Form.</p>	Volume I: Final Amendment Report Amended / Updated Application Form
20	In the grid connection draft motivation report, you have requested the deletion of condition 14 of the EA and indicated that a generic EMPr will be submitted for approval instead. Please note that the generic EMPr is required for new applications for EA that trigger activity 11 of Listing Notice 1 and activity 09 of Listing Notice 2 not for an amendment application.	<p>The generic EMPr has been removed and will not be submitted with the final Paulputs North WEF Grid Connection Report.</p> <p>It must be noted that the EMPr appended to the Final Motivation Report derived from the Paulputs North WEF (separate report) EMPr which was made available for public comment and review during this amendment application process.</p>	Volume I: Final Amendment Report - Appendix B: EMPr.

No.	Comment from DFFE	EAP Response	Section in the Final AR
21	Additionally, a generic EMPr is not required for the (Paulputs North WEF grid connection) rather an EMPr that is derived from the original EMPr taking into consideration the proposed amendments.	<p>The generic EMPr has been removed and will not be submitted with the final Paulputs North WEF Grid Connection Report.</p> <p>It must be noted that the EMPr appended to the Final Motivation Report derived from the Paulputs North WEF (separate report) EMPr which was made available for public comment and review during this amendment application process.</p>	Volume I: Final Amendment Report - Appendix B: EMPr.
22	Furthermore, generic EMPrs have been appended to the reports (Paulput North WEF grid connection and Paulput North WEF), please note that a generic EMPr is only required for a new application for EA that triggers activity 11 of Listing Notice 1 and activity 09 of Listing Notice 2. Therefore, ensure that the Paulputs North WEF EMPr includes onsite substation.	<p>The Generic EMPr has been removed from the Final Amendment Report of Paulputs North WEF.</p> <p>The Paulputs North WEF EMPr includes all relevant management measures relating to the WEF, Substation and BESS.</p>	Amendment 2: Volume I: Final Amendment Report of the Report titled: "Paulputs North WEF" – Appendix B: EMPr.
23	Ensure that a layout map is provided for each of the splits requested, with clear legend that reflect details on the map, showing sensitive areas and buffers, existing and proposed structures.	The layout maps provided for each of the splits requested is provided with clear legends that reflect details on the map, showing sensitive areas and buffers, existing and proposed structures.	Figure 3: Proposed Amendment Layout.
Public Participation			
24	Please ensure that comments from all relevant stakeholders are submitted to the Department with the final Motivation reports. This includes but not limited to the Northern Cape Department of Environment and Conservation, South African Heritage Resources Agency (SAHRA), the Department of Forestry, Fisheries and the Environment: Directorate Biodiversity and Conservation at BCAdmin@environment.gov.za; Department of Rural Development and Land Reform; Khâi Ma Local Municipality, Kai !Garib Local Municipality, Namakwa District Municipality and Department of	<p>All comments as received during the Public Participation Process are contained as Appendix C 6 of each Final Amendment Report.</p> <p>The I&AP database of the authorised Paulputs WEF EIA (Arcus, 2019) process was used as a baseline for the respective amendments and has been updated</p>	Volume I: Appendix C: Public Participation Report

No.	Comment from DFFE	EAP Response	Section in the Final AR
	<p>Water and Sanitation; Department of Transport, Roads and Public Works; ESKOM; Air Traffic and Navigation Services SOC Limited (ATNS); Civil Aviation Authority; Department of Social Development; SENTECH; Telkom SA Limited; Southern African Large Telescope (SALT); Birdlife South Africa and South African Astronomical Observatory (SAAO).</p>	<p>throughout the environmental regulatory process (Appendix C). Registration of I&APs has continued throughout the process, and the I&AP database has been updated accordingly, based on comments received.</p> <p>All comments are included in the Comments and Responses Table, and responded to and addressed by the project team, i.e. EAP, Applicant and Specialists as applicable. The Comments and Responses Report have been provided as Appendix C 7 of each Final Amendment Report.</p> <p>Formal Comment has been received from: SAHRA, DFFE, DFFE: BDC.</p> <p>Correspondence has been from: ESKOM, Department of Water and Sanitation, Department of Rural Development and Land Reform, AgriSA, NRA as well as general stakeholders (IPPs, Landowners and other Interested Parties).</p>	
25	<p>Furthermore, ensure that all issues raised and comments received during the circulation of the draft motivation reports from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final motivation report.</p>	<p>Formal comments received from DFFE, DFFE: BDC and SAHRA have been addressed in Appendix C 6 of the Public Participation Report of each Final Amendment Report, and addressed (where necessary) within the respective Final Motivation / Amendment Reports and EMPr.</p>	<p>Volume I: Appendix B; and Appendix C.</p>
26	<p>Proof of correspondence with the various stakeholders must be included in the final motivation report. This must indicate that this draft motivation report has been subjected to 30 days public participation process, stating the start and end date of the PPP. Should you be unable to obtain comments, proof should be</p>	<p>A final call for comment was sent to the I&AP Database on 03 September 2021. I&APs were provided further opportunity to comment on the draft reports until 08 September 2021.</p>	<p>Volume I: Appendix C: Public Participation Report</p>

No.	Comment from DFFE	EAP Response	Section in the Final AR
	submitted to the Department of the attempts that were made to obtain comments.	<p>This correspondence has been included in Appendix C 4 of each Final Amendment Report.</p> <p>Any comment received during this time has been included in Appendix C 6 and Appendix C 7 of the Public Participation Report of each Final Amendment Report.</p>	
General			
27	<p>You are further reminded to comply with Regulation 32(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that:</p> <p>"The applicant must within 90 days of receipt by the competent authority of the application made in terms of regulation 31, submit to the competent authority –</p> <p>(a) a report, reflecting—</p> <p>(i) an assessment of all impacts related to the proposed change;</p> <p>(ii) advantages and disadvantages associated with the proposed change; and</p> <p>(iii) measures to ensure avoidance, management and mitigation of impacts associated with such proposed change; and</p> <p>(iv) any changes to the EMPr;</p> <p>which report-</p> <p>(aa) had been subjected to a public participation process, which had been agreed to by the competent authority, and which was appropriate to bring the proposed change to the attention of potential and registered interested and affected parties, including organs of state, which have jurisdiction in respect of any aspect of the relevant activity, and the competent authority, and</p> <p>(bb) reflects the incorporation of comments received, including</p>	<p>The EAP confirms that the Final Amendment Reports complies with Regulation 32(1)(a) of the NEMA EIA Regulations, 2014, as amended.</p>	Volume I and II: Final Amendment Report

No.	Comment from DFFE	EAP Response	Section in the Final AR
	any comments of the competent authority.”		
28	Should there be significant changes or new information that has been added to the motivation report or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 32(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: “the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (b) a notification in writing that the report will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the report, which changes or information was not contained in the report consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised report will be subjected to another public participation process of at least 30 days”.	The EAP confirms that there has been no significant changes or new information that has been added to the motivation report or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process.	n/a
29	In the event where subregulation (1)(b) applies, the report, which reflects the incorporation of comments received, including any comments of the competent authority, must be submitted to the competent authority within 140 days of receipt of the application by the competent authority.	The EAP confirms that subregulation (1)(b) does not apply.	n/a
30	Should you fail to meet any of the timeframes stipulated in Regulation 32 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.	Timeframes stipulated are being adhered to in this application.	n/a
31	You are hereby reminded of Section 24F of the National Environmental Management Act, Act No 107 of 1998, as amended, that no activity may commence prior to an environmental authorisation being granted by the Department.	The Applicant / EAP takes note of this and confirms that no activity has / will commence without a positive environmental authorisation.	n/a

2 DETAILS OF THE AUTHORISED PAULPUTS WEF AND GRID CONNECTION

The Paulputs WEF EIA was finalised and submitted to the DFFE in August 2019. Paulputs Wind Energy Facility (RF) (Pty) Ltd received a favourable EA, subject to various conditions.

The authorised Paulputs WEF, grid connection and substation is located approximately 35 km north-east of Pofadder and approximately 85 km north-west of Kakamas in the Northern Cape Province³ (Table 2-1).

The authorised Paulputs WEF is situated in two district municipalities, the Namakwa District Municipality and the ZF Mgcawu District Municipality, and within the Khâi-Ma Local Municipality and the Kai !Garib Local Municipality (Figure 1).

Table 2-1: Development Area Co-ordinates of the authorised Paulputs WEF and infrastructure

Reference Point	Latitude	Longitude
WEF Development Area Co-ordinates		
A	28°52'58" S	19°41'30" E
B	28°54'45" S	19°47'05" E
C	28°55'07" S	19°46'53" E
D	28°57'39" S	19°47'57" E
E	29°00'21" S	19°45'06" E
F	28°59'42" S	19°42'00" E
G	28°57'14" S	19°39'29" E
H	28°55'39" S	19°40'44" E
Grid Connection (Option C) Development Area Co-ordinates		
Option C - Start	28°58'21" S	19°45'33" E
Option C - Middle	28°53'24" S	19°41'27" E
Option C - End	28°50'45" S	19°41'43" E
On-Site Substation (Option A) Development Area Co-ordinates		
North Corner	28°56'25.66"S	19°42'7.13"E
West Corner	28°56'32.05"S	19°42'7.70"E
South Corner	28°56'32.24"S	19°42'16.53"E
East Corner	28°56'25.89"S	19°42'16.86"E

PWEF received authorisation for the Paulputs 300 MW WEF (Figure 1 and **Error! Reference source not found.**, DFFE Reference 14/12/16/3/3/2/1120), which included the following technical details – extracted from the authorised EIA report (Arcus, August 2019).

Table 2-2: Technical Details of the Authorised WEF and Grid Connection

Component	Description/Dimensions
Paulputs WEF	

³ A distance of 50 km was previously provided in the Arcus 2019 EIA. This is incorrect. Taken from the centre of Pofadder Town, to the centre of the authorised 300 MW Paulputs WEF, the distance is approximately 35 km.

Component	Description/Dimensions
Location of the site	50 km northeast of Pofadder, Northern Cape Province. Ward 1 of the Khai Ma Local Municipality of DC6 – Namakwa District Municipality.
Farm and SG Codes	Scuitklip 92/2 C0360000000009200002 Scuitklip 92/3 C0360000000009200003 Scuitklip 92/5 C0360000000009200005 Lucasvlei 93/1 C0360000000009300001 Lucasvlei 93/2 C0360000000009300002 Lucasvlei 93/4 C0360000000009300004
Facility Area	The proposed project site is approximately 10 000 hectares. This is the total area covered, in which all components will be located. The actual development footprint will be approximately 2 % of this.
Number of Turbines	Up to 75
Site Access	N14 (NW and SE access - including abnormal loads) and MN759 (NW access only - no abnormal loads)
Hub Height from ground level	Up to 140 m
Blade Length	Up to 90 m
Rotor Diameter	Up to 180 m
Area occupied by inverter transformer stations/substations	Approximately 4 hectares
Capacity of on-site substation	132 kV on-site substation
Authorised Paulputs Grid Connection	
Farm and SG Codes	Scuitklip 92/2 C0360000000009200002
Height of pylons	Maximum of 30 m high
Length of transmission line	Maximum 12.5 km
Types of poles used	Both monopoles and lattice structures are being considered
Area occupied by pylon servitude	Width 31 m x 12.5 km = 39 hectares
Transmission capacity	132 kV line, evacuating a maximum of 300 MW
Area occupied by both permanent and construction laydown areas	Laydown areas used are the same as for the WEF
Area occupied by buildings	The O&M complex will form part of the on-site 200 m x 200 m substation compound
Length of service road	26.8 km (worst case scenario)
Width of service road	3 – 6 m wide
Height of fencing	Maximum 3 m only around on-site substation and buildings
Type of fencing	Wired mesh / chain link fence not electrified

3 DETAILS OF THE PROPOSED AMENDMENT – 132 kV GRID CONNECTION FOR THE PROPOSED PAULPUTS NORTH WEF

This section provides the technical details and design parameters of the amendment application for the 132 kV Grid Connection for the proposed Paulputs North WEF. Additionally, this chapter serves to provide insight on the choice of preferred location and feasible specifications for the construction and operation of the Grid Connection.

The technical details of the 132 kV Grid Connection for the proposed Paulputs North WEF are included in Table 3-1 below and Figure 2 and Figure 3 as part of the amendment process for approval.

Table 3-1: Amendment Proposed to the Authorised Paulputs Grid Connection Applicable to the 132 kV Grid Connection for the proposed Paulputs North WEF

	Authorised	Amendment
Holder of Authorisation	Paulputs Wind Energy Facility (Pty) Ltd	Paulputs Wind Energy Facility North (RF) (Pty) Ltd
Name and Capacity of the Development	The 300 MW Paulputs Wind Energy Facility (WEF) and associated 132 kV Grid Connection, Northern Cape Province.	132 kV Grid Connection for the Paulputs North Wind Energy Facility, Northern Cape Province.
Scope	Megawatt Capacity of 300 MW	Not included in this Split of the EA (refer to Amendment 1 and 2).
	75 Turbine Wind Turbine Generators.	Not included in this Split of the EA (refer to Amendment 1 and 2).
	<u>Grid Connection Infrastructure:</u> Single Circuit, 132kV Grid Connection.	<u>Grid Connection Infrastructure:</u> Double Circuit, loop-in and loop-out, 132 kV Grid Connection
	132 kV on-site Substation	Not included in this Split of the EA (refer to Amendment 2).

Table 3-2: Co-ordinates of the 132 kV Grid Connection for the proposed Paulputs North WEF

Reference Point	Latitude	Longitude
Grid Connection (Option C) Development Area Co-ordinates		
Option C - Start	28°58'21" S	19°45'33" E
Option C - Middle	28°53'24" S	19°41'27" E
Option C - End	28°50'45" S	19°41'43" E

3.1 Amendments proposed to the conditions of the EA for the 132 kV Grid Connection for the proposed Paulputs North WEF

Table 3-3 below describes the proposed amendments to the conditions of the EA for the 132 kV Grid Connection for the proposed Paulputs North WEF pertaining to:

1. Activity Description, Applicant Details and Activity Location;
2. Listing Notice Activities;
3. Technical Details; and

4. Conditions of the Environmental Authorisation to be Retained or Changed.
The table further provides reason and motivations for the proposed amendments.

Table 3-3: Conditions of the Authorisation to be Retained, Changed or Removed for the 132 kV Grid Connection for the proposed Paulputs North WEF

CONDITION IN THE EA WORDING	PROPOSED AMENDMENT	REASON FOR AMENDMENT
1. Amendment to the Activity Description (Cover page)		
<p>Application for Environmental Authorisation in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended: The 300 MW Paulputs Wind Energy Facility (WEF) and its associated 132kV Grid Connection, Northern Cape Province.</p>	<p>Application for Environmental Authorisation in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended: <u>The 132 kV Grid Connection for the proposed Paulputs North Wind Energy Facility (WEF)</u>, Northern Cape Province.</p>	<p>Paulputs Wind Energy Facility (RF) (Pty) Ltd are proposing to give permission to Paulputs Wind Energy Facility North (RF) (Pty) Ltd and Paulputs Wind Energy Facility South (Pty) Ltd to split and amend the Environmental Authorisation (EA) into three amendment applications for EA. This amendment applies to the split of the 132 kV Grid Connection for the proposed Paulputs North WEF.</p> <p>Paulputs Wind Energy Facility North (RF) (Pty) Ltd ('Paulputs North' – The Applicant) are applying to remove the authorised 132 kV Grid Connection (Option C) from its authorisation to use for the proposed Paulputs North WEF (separate application process). The approved grid connection will be taken over by Eskom in the future and thus requires its own Environmental Authorisation.</p>
2. Amendment of the Applicant and Project Location (Page 1 of the EA)		
<p>Holder of the authorisation: Paulputs Wind Energy Facility (RF) (Pty) Ltd Location of Activity Portion 2 of the Farm Scuitklip 92; Portion 3 of the Farm Scuitklip 92; Portion 5 of the Farm Scuitklip 92; Portion 1 of the Farm Lucasvlei 93; Portion 2 of the Farm Lucasvlei 93; Portion 4 of the Farm Lucasvlei 93; Khai-Ma and Kai !Garib Local Municipalities; ZF Mgcau and Namakwa District Municipalities; Northern Cape</p>	<p>Holder of the Authorisation: <u>Paulputs Wind Energy Facility North (RF) (Pty) Ltd</u> Location of the Activity: <u>Portion 2 of the Farm Scuitklip 92</u> <u>Portion 3 of the Farm Scuitklip 92</u> <u>Portion 5 of the Farm Scuitklip 92</u> Khai-Ma Local Municipality; Namakwa District Municipalities; Northern Cape</p>	<p>Remove the farm portions which are no longer a directly impacted by the proposed amendment.</p> <p>The holder of the Environmental Authorisation must change to reflect that of the respective split. The new holder of the EA will become Paulputs Wind Energy Facility North (RF) (Pty) Ltd.</p>

CONDITION IN THE EA WORDING	PROPOSED AMENDMENT	REASON FOR AMENDMENT
3. Listing Notice Activities (Page 3 to Page 6)		
Remain Unchanged	Remain Unchanged	-
4. Amendment of the Activity Description (Page 7 of the EA)		
For the 300 MW Paulputs Wind Energy Facility (WEF) and its associated 132kV grid connection in the Northern Cape Province, hereafter referred to as "the property".	For the <u>132 kV Grid Connection for the Paulputs North Wind Energy Facility</u> , in the Northern Cape, hereafter referred to as the " <u>proposed development</u> ".	<p>The holder of the Environmental Authorisation must change to reflect that of the respective split. The new holder of the EA will become Paulputs Wind Energy Facility North (RF) (Pty) Ltd.</p> <p>Further, the 300 MW Paulputs Wind Energy Facility must be removed from this EA. The 300 MW Paulputs WEF has been split from the authorised EA and is being dealt with in separate Part II Amendment Application Processes.</p>
5. Amendment to the Technical Description (Page 8 of the EA)		
<p>The WEF will comprise of the following:</p> <ul style="list-style-type: none"> • A maximum of 75 turbines with a total generation capacity of 300 MW. • The maximum height to tip of the blade will be 230 m, with a hub height of up to 140 m, a rotor diameter of up to 180 m and a blade length of up to 90 m. • Foundations, hardstands and permanent laydown areas associated with the wind turbines of approximately 0.8Ha. • Internal access roads of approximately 80 km in length (mostly 6m wide but up to 12m, average 8m). • Medium voltage cabling between turbines and the switching station, to be laid underground where technically feasible. • Overhead medium voltage cables between onsite substations where necessary. • One onsite substation compound of approximately 4ha consisting of: onsite substation 1.1ha, offices of 0.5ha, permanent laydown 1ha, and temporary 	<p>The WEF will comprise of the following:</p> <ul style="list-style-type: none"> • <u>Length of access roads of approximately 40 km (mostly 6 m wide, but up to 12m, average 8 m).</u> • <u>Length of Service Roads approximately 26.8 km (mostly 6 m wide, but up to 12 m, average 8 m).</u> • <u>Transmission Line Corridor of 300 m.</u> • <u>A double circuit overhead powerline that will be constructed over a distance of approximately 12.5 km and loop-in/loop-out of the existing 132kV powerline.</u> 	<ul style="list-style-type: none"> • The 300 MW Paulputs Wind Energy Facility must be removed from this EA. The 300 MW Paulputs WEF has been split from the authorised EA and is being dealt with in separate Part II Amendment Application Processes.

CONDITION IN THE EA WORDING	PROPOSED AMENDMENT	REASON FOR AMENDMENT																
construction yard 1 ha; and, <ul style="list-style-type: none"> An overhead 132kV power line will be constructed over a distance of approximately 12.5km (Option C). 																		
6. Amendment of the WEF Technical Details (Page 8 of the EA)																		
<p>WEF Technical Details:</p> <table border="1" data-bbox="188 466 786 1308"> <thead> <tr> <th data-bbox="188 466 349 528">Component</th> <th data-bbox="349 466 786 528">Description/Dimensions</th> </tr> </thead> <tbody> <tr> <td data-bbox="188 528 349 619">Location of the site</td> <td data-bbox="349 528 786 619">50 km northeast of Pofadder, Northern Cape Province.</td> </tr> <tr> <td data-bbox="188 619 349 826">Facility Area</td> <td data-bbox="349 619 786 826">The development site is approximately 10 000 hectares. This is the total area covered, in which all components will be located. The actual development footprint will be approximately 2 % of this.</td> </tr> <tr> <td data-bbox="188 826 349 917">Number of Turbines</td> <td data-bbox="349 826 786 917">Up to 75</td> </tr> <tr> <td data-bbox="188 917 349 1034">Site Access</td> <td data-bbox="349 917 786 1034">N14 (NW and SE access - including abnormal loads) and MN759 (NW access only - no abnormal loads)</td> </tr> <tr> <td data-bbox="188 1034 349 1157">Hub Height from ground level</td> <td data-bbox="349 1034 786 1157">Up to 140 m</td> </tr> <tr> <td data-bbox="188 1157 349 1219">Blade Length</td> <td data-bbox="349 1157 786 1219">Up to 90 m</td> </tr> <tr> <td data-bbox="188 1219 349 1308">Rotor Diameter</td> <td data-bbox="349 1219 786 1308">Up to 180 m</td> </tr> </tbody> </table>	Component	Description/Dimensions	Location of the site	50 km northeast of Pofadder, Northern Cape Province.	Facility Area	The development site is approximately 10 000 hectares. This is the total area covered, in which all components will be located. The actual development footprint will be approximately 2 % of this.	Number of Turbines	Up to 75	Site Access	N14 (NW and SE access - including abnormal loads) and MN759 (NW access only - no abnormal loads)	Hub Height from ground level	Up to 140 m	Blade Length	Up to 90 m	Rotor Diameter	Up to 180 m	<p>To be removed</p>	<ul style="list-style-type: none"> Component must be removed from the EA as it is being applied for as part of a separate amendment application (Amendment 1 and 2) for environmental authorisation.
Component	Description/Dimensions																	
Location of the site	50 km northeast of Pofadder, Northern Cape Province.																	
Facility Area	The development site is approximately 10 000 hectares. This is the total area covered, in which all components will be located. The actual development footprint will be approximately 2 % of this.																	
Number of Turbines	Up to 75																	
Site Access	N14 (NW and SE access - including abnormal loads) and MN759 (NW access only - no abnormal loads)																	
Hub Height from ground level	Up to 140 m																	
Blade Length	Up to 90 m																	
Rotor Diameter	Up to 180 m																	

CONDITION IN THE EA WORDING		PROPOSED AMENDMENT	REASON FOR AMENDMENT																											
Area occupied by inverter transformer stations/substations	Approximately 4 hectares																													
Capacity of on-site substation	132 kV																													
7. Amendment of the Grid Connection Technical Details (Page 9 of the EA)																														
<p><u>Grid Connection Technical Details:</u></p> <table border="1"> <thead> <tr> <th>Component</th> <th>Description/Dimensions</th> </tr> </thead> <tbody> <tr> <td>Height of Pylons</td> <td>Maximum of 30m high</td> </tr> <tr> <td>Length of Transmission Line</td> <td>Maximum of 12.5km</td> </tr> <tr> <td>Type of Poles used</td> <td>Both monopoles and lattice structures are being considered</td> </tr> <tr> <td>Area to be occupied by pylon servitude</td> <td>Width 31m x 12.5km = 39 Hectares</td> </tr> <tr> <td>Transmission capacity</td> <td>132kV line, evacuating a maximum of 300MW</td> </tr> <tr> <td>Area occupied by both permanent and construction laydown areas</td> <td>Laydown areas to be used are the same as the WEF</td> </tr> </tbody> </table>		Component	Description/Dimensions	Height of Pylons	Maximum of 30m high	Length of Transmission Line	Maximum of 12.5km	Type of Poles used	Both monopoles and lattice structures are being considered	Area to be occupied by pylon servitude	Width 31m x 12.5km = 39 Hectares	Transmission capacity	132kV line, evacuating a maximum of 300MW	Area occupied by both permanent and construction laydown areas	Laydown areas to be used are the same as the WEF	<p><u>Grid Connection Technical Details:</u></p> <table border="1"> <thead> <tr> <th>Component</th> <th>Description/Dimensions</th> </tr> </thead> <tbody> <tr> <td><u>Location of the site</u></td> <td>35 km northeast of Pofadder, Northern Cape Province. Ward 1 of the Khai Ma Local Municipality of DC6 – Namakwa District Municipality. Ward 9 of the Kai !Garib Local Municipality of DC8 – ZF Mcgawu District Municipality</td> </tr> <tr> <td>Height of Pylons</td> <td>Maximum of 30m high</td> </tr> <tr> <td>Length of Transmission Line</td> <td>Maximum of 12.5km</td> </tr> <tr> <td>Type of Poles used</td> <td>Both monopoles and lattice structures are being considered</td> </tr> <tr> <td>Area to be occupied by pylon servitude</td> <td>Width 31 m x 12.5 km = 39 Hectares</td> </tr> </tbody> </table>		Component	Description/Dimensions	<u>Location of the site</u>	35 km northeast of Pofadder, Northern Cape Province. Ward 1 of the Khai Ma Local Municipality of DC6 – Namakwa District Municipality. Ward 9 of the Kai !Garib Local Municipality of DC8 – ZF Mcgawu District Municipality	Height of Pylons	Maximum of 30m high	Length of Transmission Line	Maximum of 12.5km	Type of Poles used	Both monopoles and lattice structures are being considered	Area to be occupied by pylon servitude	Width 31 m x 12.5 km = 39 Hectares	<p>A single circuit 132 kV grid connection was assessed as part of the approved EIA/EMPr. The proposed amendment to a 132 kV Double Circuit loop in loop out grid connection has been assessed by the specialists and EAP during this application process. This line does not deviate from that which was approved and will be contained within the 300 m corridor previously assessed by specialists. No additional impacts are expected.</p>
Component	Description/Dimensions																													
Height of Pylons	Maximum of 30m high																													
Length of Transmission Line	Maximum of 12.5km																													
Type of Poles used	Both monopoles and lattice structures are being considered																													
Area to be occupied by pylon servitude	Width 31m x 12.5km = 39 Hectares																													
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Area occupied by both permanent and construction laydown areas	Laydown areas to be used are the same as the WEF																													
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Area to be occupied by pylon servitude	Width 31 m x 12.5 km = 39 Hectares																													

CONDITION IN THE EA WORDING		PROPOSED AMENDMENT		REASON FOR AMENDMENT
Areas occupied by buildings	The O&M complex will form part of the on-site 200m x 200m substation compound	Transmission capacity	<u>Double Circuit, 132 kV line, evacuating a maximum of 150 MW. Loop-in/Loop-out of the exiting 132kV powerline</u>	
Length of service road	26.8km (worst case scenario)	Area occupied by both permanent and construction laydown areas	Laydown areas to be used are the same as the WEF	
Width of service road	3 – 6m wide	Areas occupied by buildings	<u>Remove</u>	
Height of fencing	Maximum of 3m only around on-site substation and buildings	Length of service road	26.8 km (worst case scenario)	
Type of fencing	Wire Mesh / Chain link fence not electrified.	Width of service road	3 – 6 m wide	
		Height of fencing	Maximum of 3 m only around on-site substation and buildings	
		Type of fencing	Wire Mesh / Chain link fence not electrified.	

8. Amendment to the Conditions of the Authorised EA

AMENDMENT TYPE	CONDITION NO.	CONDITION WORDING	PROPOSED AMENDMENT	REASON FOR AMENDMENT
Scope of Authorisation	1	Power line option C and substation location A as part of the development of the 300 MW Paulputs Wind Energy Facility (WEF) as described above is hereby approved.	Power line option C and substation location A as part of the development of the <u>150MW Paulputs North Wind Energy Facility (WEF)</u> 300MW Paulputs Wind Energy Facility (WEF) as described above is hereby approved.	Paulputs Wind Energy Facility (RF) (Pty) Ltd are proposing to give permission to Paulputs Wind Energy Facility North (RF) (Pty) Ltd and Paulputs Wind Energy Facility South (Pty) Ltd to split and amend the Environmental Authorisation (EA) into three amendment applications for EA. This amendment applies to the split of the 132 kV Grid Connection for the proposed Paulputs North WEF.

AMENDMENT TYPE	CONDITION NO.	CONDITION WORDING	PROPOSED AMENDMENT	REASON FOR AMENDMENT
				Paulputs Wind Energy Facility North (RF) (Pty) Ltd ('Paulputs North' – The Applicant) are applying to remove the authorised 132 kV Grid Connection (Option C) from its authorisation to use for the proposed Paulputs North WEF (separate application process). The approved grid connection will be taken over by Eskom in the future and thus requires its own Environmental Authorisation.
	2 – 3	No change to the existing EA. Conditions to be included 'as is' in the new EA.		
	4	The activities authorised may only be carried out at the property as described above	Activities authorised my only be carried out at the property as described <u>in the amendment application.</u>	Farm portions not triggered by the activities for this amendment has been removed.
	5 - 7	No change to the existing EA. Conditions to be included 'as is' in the new EA.		
	8	Construction must be completed within five (05) years of the commencement of the activity on site	Construction must be completed within ten (10) years of the commencement of the activity on site.	This condition is impractical, based on the project programme and the nature and scale of the construction activities. It is proposed that this condition be amended to make provision for a 10-year period for construction to commence.
	9	No change to the existing EA. Conditions to be included 'as is' in the new EA.		
Notification of Authorisation and Right to Appeal	10 - 11	No change to the existing EA. Conditions to be included 'as is' in the new EA.		
Commencement of the Activity	12	No change to the existing EA. Conditions to be included 'as is' in the new EA.		
Management of the Activity	13	Slight change	A copy of the final site layout map must be made available for comments by registered Interested and Affected Parties and the holder of this environmental authorisation must consider such comments. Once amended, the final development layout map must	Remove reference to infrastructure which is not part of this amendment application.

AMENDMENT TYPE	CONDITION NO.	CONDITION WORDING	PROPOSED AMENDMENT	REASON FOR AMENDMENT
			<p>be submitted to the Department for written approval prior to commencement of the activity. All available biodiversity information must be used in the finalisation of the layout map. Existing infrastructure must be used as far as possible e.g. roads. The layout map must indicate the following:</p> <p>13.1. Cable routes (where they are not along internal roads);</p> <p>13.2. Position of wind turbines and associated infrastructure;</p> <p>13.3. Internal roads indicating width;</p> <p>13.4. Wetlands, drainage lines, rivers, stream and water crossing of roads and cables;</p> <p>13.5. All sensitive features e.g. Critical Biodiversity Areas, Ecological Support Areas, heritage sites, wetlands, pans and drainage channels that will be affected by the facility and associated infrastructure;</p> <p>13.6. Substation(s) inverters and/or transformer(s) sites including their entire footprint;</p> <p>13.7. Connection routes (including pylon positions} to the distribution/transmission network;</p> <p>13.8. All existing infrastructure</p>	

AMENDMENT TYPE	CONDITION NO.	CONDITION WORDING	PROPOSED AMENDMENT	REASON FOR AMENDMENT
			on the site, such as roads; 13.9. Soil heaps (temporary for topsoil and subsoil and permanently for excess material); 13.10. Buildings, including accommodation; and, 13.11. All "no-go" and buffer areas.	
	14 - 18	No change to the existing EA. Conditions to be included 'as is' in the new EA.		
Frequency and Process of Updating the EMPr	19 - 23	No change to the existing EA. Conditions to be included 'as is' in the new EA.		
Monitoring	24	No change to the existing EA. Conditions to be included 'as is' in the new EA.		
Recording and Reporting to the Department	25 – 30	No change to the existing EA. Conditions to be included 'as is' in the new EA.		
Notification to Authorities	31	No change to the existing EA. Conditions to be included 'as is' in the new EA.		
Operation of the Activity	32	No change to the existing EA. Conditions to be included 'as is' in the new EA.		
Site Closure and Decommissioning	33	No change to the existing EA. Conditions to be included 'as is' in the new EA.		
Specific Conditions	34 - 36	No change to the existing EA. Conditions to be included 'as is' in the new EA.		
	37	A construction and operational avifauna and bat monitoring plan must be developed and implemented according to the latest Birdlife South Africa/Endangered Wildlife Trust: Best practice guidelines for avian monitoring and impact	A construction and operational avifauna and bat monitoring plan must be developed and implemented according to the latest Birdlife South Africa/Endangered Wildlife Trust: Best practice guidelines for avian monitoring and impact	Comment received on 01 September 2021 from the Department of Forestry, Fisheries and Environment: Biodiversity Conservation requested that a Pre and Post Bat Monitoring Plan be developed for the proposed development. A bat management plan has been included in the EMPr.

AMENDMENT TYPE	CONDITION NO.	CONDITION WORDING	PROPOSED AMENDMENT	REASON FOR AMENDMENT
		mitigation at proposed wind energy development sites in Southern Africa and the latest South African Bat Assessment Advisory Panel's (SABAAP) guidelines.	mitigation at proposed wind energy development sites in Southern Africa and the latest South African Bat Assessment Advisory Panel's (SABAAP) guidelines. <u>A Bat management plan must be developed and implemented as recommended by the DFFE: BDC.</u>	
	38	No change to the existing EA. Conditions to be included 'as is' in the new EA.		
	39	The results of the pre-construction bird and bat monitoring assessments including all recommendations proposed by the reports dated August 2019, must inform the final layout and the construction schedule of the facility.	The results of the pre-construction bird and bat monitoring assessments including all recommendations proposed by the reports dated August 2019 and February 2021, respectively, must inform the final layout and the construction schedule of the <u>132 kV Grid Connection for the proposed Paulputs North Wind Energy Facility.</u>	To include the recommendations proposed in the Final Amendment Report.
	40 - 53	No change to the existing EA. Conditions to be included 'as is' in the new EA.		
General	54	The recommendations of the EAP in the EIAR dated August 2019 and the specialist studies attached must be adhered to. In the event of any conflicting mitigation measures and conditions of the environmental authorisation, the specific condition of this environmental authorisation will take preference.	The recommendations of the EAP in the EIAR dated August 2019 and the specialist studies attached must be adhered to, and <u>this includes the recommendations of the EAP in the Amendment Report dated September 2021 and the specialist studies attached.</u> In the event of any conflicting mitigation measures and conditions of the Environmental Authorisation, the specific	This condition must be updated to reflect any additional recommendations / mitigations included in the final amendment report as well as EMPr.

AMENDMENT TYPE	CONDITION NO.	CONDITION WORDING	PROPOSED AMENDMENT	REASON FOR AMENDMENT
			condition of this Environmental Authorisation will take preference.	
	55 - 56	No change to the existing EA. Conditions to be included 'as is' in the new EA.		

4 CHANGES TO THE ENVIRONMENTAL MANAGEMENT PROGRAMME (EMPr)

Although an EMPr was compiled as part of the authorised Paulputs WEF EIA (Arcus, August 2019), the EMPr was not authorised in the Environmental Authorisation. The EMPr for the 132 kV Grid Connection for the proposed Paulputs North WEF has been adapted to include only aspects relevant to the 132 kV Grid Connection for the proposed Paulputs North WEF.

An EMPr compiled by Arcus has been included as Appendix B.

5 LEGISLATIVE REQUIREMENTS

Plate 5-1 below provides a brief summary of the methodology that is applied in conducting the amendment process.

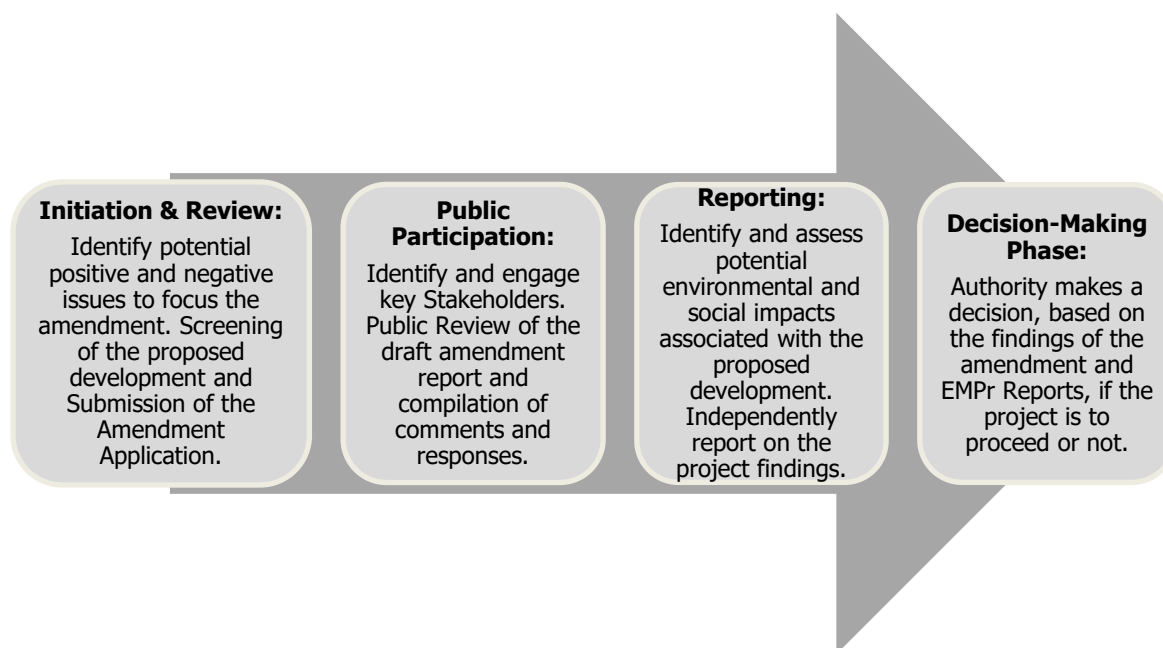


Plate 5-1: Summarised Methodology applied to conducting an amendment process

This EA Amendment Report has been compiled in compliance with the National Environmental Management, 1998 (Act No. 107 of 1998) (NEMA) EIA Regulations 2014, as amended. Paulputs Wind Energy Facility (Pty) Ltd are applying for an amendment to the EA issued by the DFFE (DFFE Reference No. 14/12/16/3/3/2/1120) in terms of Regulation 31 and 32 of the EIA Regulations. Regulation 31 of the EIA Regulations 2014 as amended states that:

'An environmental authorisation may be amended by following the process prescribed in this Part if the amendment will result in a change to the scope of a valid environmental authorisation where such change will result in an increased level or change in the nature of impact where such level or change in nature of impact was not-

(a) assessed and included in the initial application for environmental authorisation; or

(b) taken into consideration in the initial environmental authorisation;

and the change does not, on its own, constitute a listed or specified activity.'

In compliance with Regulation 32 of the NEMA EIA Regulations 2014, as amended, the specialists assessed the proposed changes to the authorised project description and

highlighted the advantages and disadvantages of the proposed amendments, and provided further recommendations or mitigation measures if necessary.

Table 5-1: Legislative Requirements of the Amendment Report

CONTENTS OF THE AMENDMENT REPORT	
32 (1) The applicant must within 90 days of receipt by the competent authority of the application made in terms of regulation 31, submit to the competent authority -	Chapter
(a) A report, reflecting –	
An assessment of all impacts related to the proposed change;	Section 9 and 10
Advantages and disadvantages associated with the proposed change;	Section 11
Measures to ensure avoidance, management and mitigation of impacts associated with such proposed change; and	Section 9 and 10
Any changes to the EMP.	Section 4
Which report –	
aa. Had been subjected to a Public Participation Process (PPP), which had been agreed to by the competent authority, and which was appropriate to bring the proposed change to the attention of potential and registered interested and affected parties, including organs of state, which have jurisdiction in respect of any aspect of the relevant activity, and the competent authority, and	Section 6
bb. Reflects the incorporation of comments received, including any comments of the competent authority; or	Appendix C
(b) A notification in writing that the report will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the report, which changes or information was not contained in the report consulted on during the initial PPP contemplated in sub-regulation (1) (a) and that the revised report will be subjected to another PPP of at least 30 days.	Not applicable
32 (2) In the event where sub-regulation (1) (b) applies, the report, which reflects the incorporation of comments received, including any comments of the competent authority, must be submitted to the competent authority within 140 days of receipt of the application by the competent authority.	Not applicable

This report has taken cognisance of the following legislation.

Table 5-2: Additional Legislative Requirements of the Amendment Report

Applicable National Legislation and Guidelines used to compile the report
<i>The Constitution of South Africa, 1996 (Act 108 of 1996).</i>
<i>National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA)</i>
<i>National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) (NEM: WA)</i>
<i>National Water Act, 1998 (Act No. 36 of 1998) (NWA)</i>
<i>National Environmental Management: Biodiversity Act, 2004 (Act No.10 of 2004) (NEM:BA)</i>
<i>National Environmental Management: Protected Areas Act, 2003 (Act No 57 of 2003 as amended) (NEM:PAA)</i>
<i>Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983)</i>
<i>The National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA)</i>
<i>National Road Traffic Act, 1996 (Act No. 93 of 1996) (NRTA)</i>
<i>National Forests Act, 1998 (Act No. 84 of 1998) (NFA)) and National Veld and Forest Fire Act, 1998 (Act No. 101 of 1998).</i>

Applicable National Legislation and Guidelines used to compile the report
<i>Hazardous Substances Act, 1973 (Act No. 15 of 1973)</i>
<i>Promotion of Access to Information Act, 2000 (Act No. 2 of 2002) (PAIA)</i>
<i>National Dust Control Regulations, 2013</i>
<i>The National Development Plan, 2030</i>
<i>The Public Participation Guidelines in terms of the National Environmental Management Act, 1998 Environmental Impact Assessment Regulations, 2017</i>
<i>Integrated Environmental Management Guideline on Need and Desirability, 2017</i>
<i>South Africa's National Biodiversity Strategy and Action Plan</i>
<i>National Environmental Management Act; National Appeal Regulations, 2014</i>
Applicable Provincial Legislation and Guidelines used to compile the report
<i>The Nature and Environmental Conservation Ordinance No. 19 of 1974; and Northern Cape Nature Conservation Act, 2009 (Act No. 9 of 2009).</i>
<i>Northern Cape Provincial Spatial Development Framework (PSDF), 2012</i>

In addition to the above, the renewable energy industry has substantial support in the South African planning context, which is detailed in the following national and provincial plans:

- National Development Plan;
- National Integrated Energy Plan (2016)
- Renewable Energy Development Zones (REDZ) as read in GNR 114 and GNR 113 of 16 February 2018;
- National Integrated Resource Plan for Electricity, 2019 (2010-2013); and
- National Infrastructure Plan.

6 PUBLIC PARTICIPATION PROCESS

The Public Participation Process (PPP) has been designed to comply with the regulatory requirements set out in the EIA Regulations of 2014 (as amended). In addition, the public participation for this project has been aligned to the NEMA, as amended, PPP Guidelines (2017) and is not intended to be a substitute for the provisions of the NEMA, the SEMAs or the Regulations, in any way.

Public Participation is an important part of any application and must be done appropriately to prevent the project being at risk from challenge that due process has not been followed.

The aim of PPP for the Amendment Process is outlined below:

- Facilitate I&APs to raise any issues of concern and/or suggestions for enhanced benefits;
- Verify that issues have been recorded and considered in the Amendment process by the project team;
- Host a facilitated public meeting, *if required*;
- Assist in identifying reasonable alternatives;
- Provide relevant local information and knowledge to the environmental assessment;
- Facilitate comment on the findings of the environmental assessments; and
- Obtain information on the outcome, i.e., the competent authority's decision, and how and by when the decision can be appealed.

Arcus encourages stakeholder involvement throughout the project process. Stakeholders can become involved in the project in the following ways:

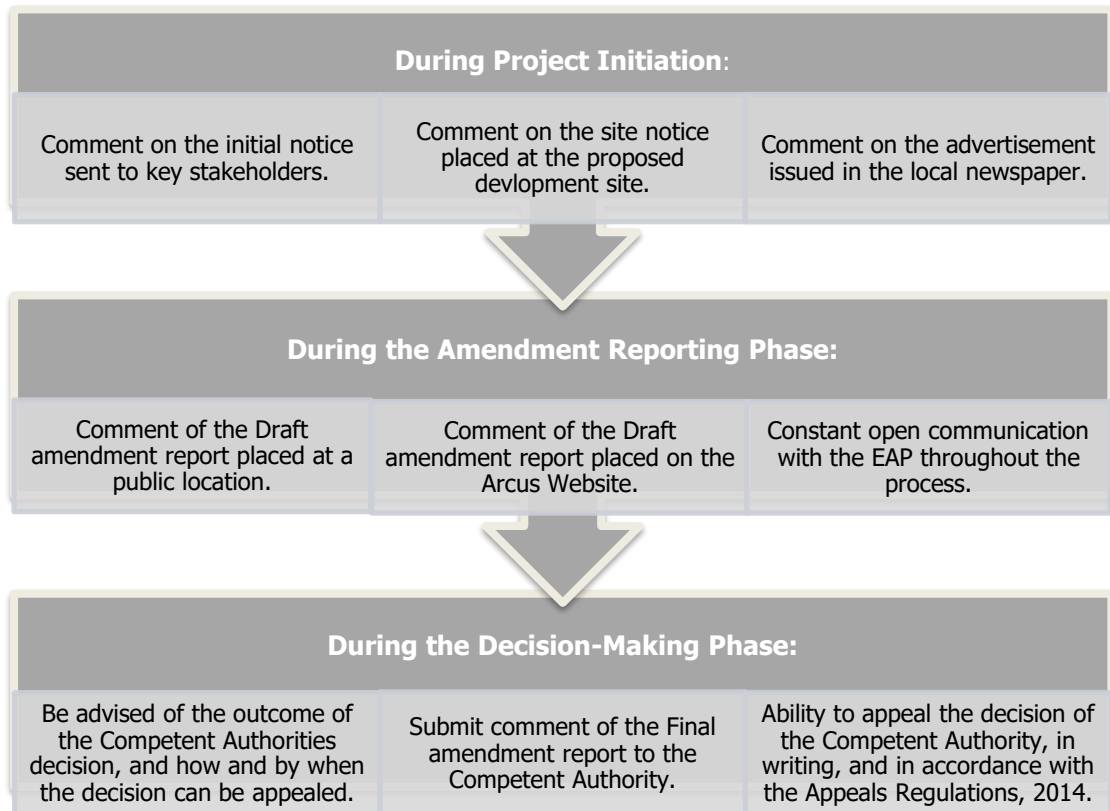


Plate 6-1: Phases in the project where stakeholders are able to be involved in the proposed amendment process

A public participation plan (PP Plan) was compiled and submitted to the CA on the 26 August 2020. This plan was submitted in compliance with Section 5.1 and Annexure 2 of the Regulation GNR660 published on 05 June 2020 in terms of the Disaster Management Act (57/2002) and titled: Directions Regarding Measures to Address, Prevent and Combat the Spread of COVID-19 Relating to National Environmental Management Permits and Licences.

The plan was not granted written approval for the following reason:

"Please note that the Department has no mandate to approve the Public Participation Plan during alert level 2 of Covid-19. The direction that required submission of PPP during level 3 is no longer applicable in level 2. However, you are required to ensure that the EIA Regulations 2014 as amended are strictly followed and ensure that the disaster management directions which are still applicable are considered".

Despite the above, Arcus have taken the decision to continue to follow the PP Plan that was submitted on 26 August 2020.

This application is for a Part II Amendment of an existing EA and is submitted in terms of Regulation 31. The public participation requirements for a Part II Amendment are contained in Regulation 32(1)(aa), which requires that the amendment report be subjected to a public participation process, which had been agreed to by the competent authority, and which was appropriate to bring the proposed change to the attention of potential interested and registered interested and affected parties, including organs of state, which have jurisdiction in respect of the relevant activity and the competent authority.

In terms of the above, and in accordance with the submitted Public Participation Plan, the following actions will be/have been undertaken for this amendment report.

6.1 Identification of Key Stakeholders

The I&AP database of the authorised Paulputs WEF EIA (Arcus, 2019) process was used as a baseline for this amendment application.

The Department of Forestry, Fisheries and Environment (DFFE) will act as the CA on the proposed amendment. A stakeholder database has been compiled and has been updated throughout the environmental regulatory process (Appendix C).

Registration of I&APs has continued throughout the process, and the I&AP database has been updated accordingly based on comments received and has been included in the final amendment report.

All comments are included in the Comments and Responses Table (Appendix 6 of the PP Report), and responded to and addressed by the project team, i.e., EAP, Applicant and Specialists as applicable. The Comments and Responses Report is provided in the Final Amendment Report (Appendix C).

6.2 Public Participation Materials

Considering the legislative and good practice requirements, the following have been developed and distributed to stakeholders. The various PPP information materials which were used as part of the Amendment process are included in Appendix C.

- Distribution of the Initial Notification: Letters announcing the Amendment process and inviting I&APs to register on the project database were sent on 20 January 2021.
- Background Information Document (BID): The BID was distributed on 22 January 2021.
- Newspaper Advertisement: Advertisements were placed in the Gemsbok and Die Burger newspapers on 13 November 2020.
- Site Notice: Site notices and posters were erected around the site as well as in the town of Pofadder and Kakamas in February 2020.
- Notification Letter of Draft Report Availability: Notification letters announcing the availability of the amendment report were sent to the I&AP Database on the 02 August 2021.

Invitation to Comment: Members of the public, local communities, and stakeholders are invited to comment on the Amendment Report which was made available for public review and comment from **Monday, 02 August 2021 to Wednesday, 01 September 2021 (both days inclusive)** at the following locations.

Location	Physical Address	Contact person
Hard Copy Location:		
Pofadder Library	Loop street, Pofadder	J. Kamies – 054 933 0221
Electronic Copy Location		
Arcus Website	https://arcusconsulting.co.za/projects/	Ashleigh von der Heyden 021 412 1529
Comment Submission		
<p>Comments were submitted to: Arcus Consultancy Services South Africa (Pty) Ltd 240 Main Road, 1st Floor Great Westerford, Rondebosch, 7700 T +27 (0) 21 412 1529 E paulputs@arcusconsulting.co.za</p>		

6.2.1 Comment and Responses

Comments received throughout the application process has been captured in a Comments and Reponses Report (CRR) to form part of the PP Appendix C (refer to Appendix C6).

Comments received before finalisation of this final amendment report have been included in the Comments and Response trail, and responded to and addressed by the project team, i.e., EAP, Applicant and Specialists as applicable.

7 MOTIVATION FOR UNDERTAKING THE PROPOSED AMENDMENTS

Paulputs Wind Energy Facility (Pty) Ltd (PWEF) intend to remove the authorised 132 kV Grid Connection (Option C) from its authorisation in favour of use for the proposed Paulputs North WEF. The approved grid connection will be taken over by ESKOM in the future and thus requires its own Environmental Authorisation.

The findings and assessment of the authorised Paulputs WEF (Arcus, August 2019) indicated that renewable energy is strongly supported at a national, provincial and local level. Therefore, the need and desirability of the authorised Paulputs WEF (Arcus, August 2019) remain valid for this amendment application. Therefore, **the need and desirability of the authorised Paulputs WEF (Arcus, August 2019) remain valid for this amendment application.**

Renewable Energy Focus

The need for the proposed grid connection amendment is supported in terms of meeting the country's climate change goals, and in terms of reducing the country's dependence on fossil fuels as the main source of meeting the country's electricity requirements through the development of the proposed Paulputs North WEF. National, provincial and local policies and planning documents support the development of renewable energy facilities, and the associated socio-economic boost at the local level in an area that is in need of it.

The establishment of the proposed Paulputs North WEF will create direct jobs largely during the construction period. Indirect jobs in accommodation, catering and other services that would support a wind farm as well as training, business and skill development opportunities will be realised. REIPPPP local economic development requirements are expected to enhance these positive benefits. Several other renewable energy facilities located nearby will result in further enhancement of the positive socio-economic benefits. It is envisioned that the proposed Grid Connection will be crucial to ensuring that the WEF is supported in terms of evacuating generated renewable energy into the National Eskom Grid.

In addition to the above, the Strategic Environmental Assessment for Electricity Grid Infrastructure (EGI) in South Africa identified five Strategic Transmission Corridors, which are considered important to support the large scale electricity transmission and distribution infrastructure. The proposed grid connection falls within the Northern Strategic Transmission Corridor and thus supports the country's needs to further strengthen the electrical grid infrastructure across South Africa.

Grid Connection Need and Desirability

The need and desirability for these types of developments, and within the recommended Strategic Transmission Corridor, play a role in assisting South Africa in meeting its energy and climate change targets and also provides a socio-economic boost at the local level in areas that are in need of it. Both national and provincial policies and planning documents support the development of renewable energy facilities, and the proposed Paulputs North WEF cannot be developed without authorisation of a suitable grid connection.

The establishment of proposed grid connection in the area may place pressure on local services, specifically medical, education and accommodation, associated with the potential influx of people to the area in seek of employment opportunities. The potential impact or pressures on local services can be mitigated by employing local community members and should also be viewed within the context of the potential positive cumulative impacts for the local economy associated with the establishment of such infrastructure, within a Strategic Transmission Corridor, as an economic driver in the area.

South Africa faces serious electricity and water shortages due to its heavy dependency on fossil fuels and increases in demand. There is, therefore, a strong need for additional electricity generation options to be developed and to diversify the sources of energy that feed into the national grid. The purpose of the proposed grid connection, situated within a Strategic Infrastructure Corridor, is to export the renewable energy, generated by the proposed Paulputs North WEF, to the national grid. There are many other socio-economic benefits that could be realised should the project be authorised. These include (but are not limited to):

- Reduced air pollution emissions - burning fossil fuels generates CO₂ emissions which contribute to global warming. In addition, burning fossil fuels produces emissions of sulphurous and nitrous oxides which are hazardous to human health and impact on ecosystem stability;
- Water resource-saving - conventional coal-fired power stations use large quantities of water during their cooling processes. WEFs require limited amounts of water during construction and almost no water during operation. As a water-stressed country, South Africa should be conserving such resources wherever possible;
- Improved energy security - renewables can often be deployed in a decentralised way close to consumers improving grid strength while reducing expensive transmission and distribution losses. They also contribute to a diverse energy portfolio;
- Exploit significant natural renewable energy resources - biomass, solar and wind resources remain largely unexploited;
- Sustainable energy solution - the uptake of renewable energy technology addresses the country's energy needs in a sustainable manner, generating electricity to meet growing demands in a manner which is sustainable for future generations; and
- Employment creation and other local economic benefits associated with support for a new industry in the South African economy.

The proposed amendment site is currently used for low intensity grazing and has little potential for other types of land use. Grazing could continue on the site during the construction and operation of the development. Cumulatively the proportion of land potentially occupied by renewable energy facilities within a 35 km radius of the site is approximately 1 % (Figure 4). In an area of low agricultural or other land use potential, and considering the need to meet South Africa's renewable energy generation targets, the proposed amendment is desirable at this time and place.

8 RECEIVING ENVIRONMENT

As the proposed amendment falls within the western portion (of the N14 Highway) previously assessed as part of the authorised footprint of the Paulputs WEF EIA 2019, the site description and attributes associated with this amendment remain unchanged from what was presented in the original environmental assessment (Arcus, August 2019).

9 SPECIALIST ASSESSMENT OF THE PROPOSED AMENDMENT

The EIA conducted by Arcus in 2019 for the authorised Paulputs WEF assessed the potential impacts of the proposed amendment by using specialist input. The same specialists were commissioned during this EA Amendment process.

The Paulputs WEF Final EIA Report (Arcus, August 2019) concluded that there are no negative high residual impacts, including potential cumulative impacts associated with the proposed amendment.

As agreed with the competent authority during the pre-application meeting, this amendment assessment is supplemented with statements from the specialists outlined in Table 1-1. The findings of each of these specialists relating to the potential impacts of the proposed amendments are summarised in the following sections.

9.1 Environmental Screening Tool

In terms of GN R960 (promulgated on 5 July 2019), and Regulation 16 (1)(b)(v) of the EIA Regulations, 2014 (as amended), the submission of a Screening Report generated from the national web based environmental screening tool is compulsory for the submission of BA, Part II and EIA applications in terms of Regulation 19 and 21 of EIA Regulations, 2014 (as amended).

The screening tool and assessment was finalised on 23 July 2021 (Volume II). The report included 7 Solar Development Applications have been authorised within a 30 km radius of the proposed development Environmental Management Frameworks (EMF). The majority of these are Concentrated Solar Power (CSP) projects. A portion of the project falls within the Olifants EMF in the ZF Mgcawu District Municipality. In terms of development incentives, restrictions, exclusions or prohibitions, the tool concluded that the site falls within the Strategic Transmission Corridor – specifically the Northern Corridor.

Based on the identified footprint sensitivities of the proposed development, the requirements for submission of the screening tool report is applicable as it triggers NEMA EIA Regulations, 2014 (as amended). Table 9-1 provides a summary of the specialist assessments identified by the tool, and the response to each assessment in terms of the proposed development.

Table 9-1: Specialist assessments identified in terms of the national web based screening tool for the proposed development

Identified Specialist Assessment	Identified Screening Tool Sensitivity	Site Verification Statement	Specialist Opinion (Agree with Screening tool or Disagree with Screening tool)
Agricultural Impact Assessment	Medium Sensitivity	<p>The significance of all agricultural impacts is kept low by two important factors. The first is that the actual footprint of disturbance of the wind farm constitutes only a very small proportion of the available grazing land. The second is the fact that the proposed site is on land of very limited agricultural potential that is only viable for grazing.</p> <p>The motivation and evidence for confirming the sensitivity is that the low land capability of the area is predominantly a function of the arid climate. The aridity of the climate is entirely beyond dispute, and there is no particular evidence needed to show this. The differences between medium and low sensitivity on this site are largely insignificant and are more a result of the way the land capability data is generated per pixel, than any practical, on the ground differences in agricultural potential.</p>	Disagree
Archaeological and Cultural Heritage Impact Assessment	Low Sensitivity	<p>The majority of the site is of low sensitivity with only small pockets (where archaeological resources were found) considered to be of medium sensitivity. Since none of the sites were of high cultural significance, these can all be considered as medium sensitivity areas.</p>	Agree
Palaeontology Impact Assessment	Medium Sensitivity	<p>The screening tool report contains no palaeontological map which indicates 100% medium sensitivity. This is in line with the specialist study conducted during the impact assessment phase.</p>	Agree
Terrestrial Biodiversity Impact Assessment	Very High Sensitivity	<p>Terrestrial Biodiversity Theme is <u>Very High</u>, with Critical Biodiversity Area 1 & 2, Ecological Support Area, FEPA quaternary catchments and Focus Areas for land-based protected areas expansion (NPAES) indicated as being present by the Screening tool. The site verification report confirms that the terrestrial biodiversity screening tool correctly identifies Critical Biodiversity Area 1 & 2 as well as Ecological Support Area as being within the project footprint. No Focus Areas for land-based protected areas expansion are directly affected, but several are located in the vicinity.</p> <p>The grid connection is located in the same footprint to the original footprint and there are no pylons proposed in High or Very High sensitivity areas, which is in-line with the recommendations of the original EIA study.</p>	Agree

Identified Specialist Assessment	Identified Screening Tool Sensitivity	Site Verification Statement	Specialist Opinion (Agree with Screening tool or Disagree with Screening tool)
Plant Species Assessment	Medium Sensitivity	The screening tool correctly identifies a single species (Sensitive species 144) as possibly being present, as it is in the general area. The likelihood of <i>Crotalaria pearsonii</i> being present is low, however, it will be investigated further in the plant species assessment.	Agree
Animal Species Assessment	Medium Sensitivity	Animal Species Theme is Medium with possibly species including a single bird, <i>Neotis ludwigii</i> . The bird species <i>Neotis ludwigii</i> is not included in the terrestrial biodiversity assessment, as it is assessed independently in the Avifaunal assessment undertaken by Dr Owen Davies. Avian sensitivity as identified by the screening tool is of <u>low</u> sensitivity. No other faunal sensitivities are indicated. No mammals, reptiles, amphibians, or invertebrate species are listed.	Agree
Aquatic Biodiversity Impact Assessment	Low Sensitivity	The site is drained by several non-perennial watercourses, hence would be considered to be within FEPA quaternary catchments. Wetland and River features are confirmed to be present. In general aquatic features are avoided as far as possible and are limited to road crossings where necessary.	Agree but avoided
Civil Aviation	Low Sensitivity	CAA Theme was listed as having a low sensitivity and no specific assessment protocol has been prescribed. In this instance, as no specific assessment protocol has been prescribed, the required level of assessment must be based on the findings of the Initial Site Sensitivity Verification and must comply with Appendix 6 of the Environmental Impact Assessment Regulations promulgated under sections 24(5) and 44 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (The Act), where a specialist assessment is required. The CAA was notified during the initial notification period, and has been provided with the opportunity to comment on the amendment report. Should permits be required, these will be applied for accordingly in terms of a Civil Aviation Assessment, no assessment is required.	Agree

Identified Specialist Assessment	Identified Screening Tool Sensitivity	Site Verification Statement	Specialist Opinion (Agree with Screening tool or Disagree with Screening tool)
Defence	Low Sensitivity	<p>Defence Theme was listed as having a low sensitivity and no specific assessment protocol has been prescribed. In this instance. As no specific assessment protocol has been prescribed, the required level of assessment must be based on the findings of the Initial Site Sensitivity Verification and must comply with Appendix 6 of the Environmental Impact Assessment Regulations promulgated under sections 24(5) and 44 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (The Act), where a specialist assessment is required.</p> <p>Defence (through the CAA) was notified during the initial notification period, and has been provided with the opportunity to comment on the amendment report.</p>	Agree

Further, GN R320, promulgated 20 March, states that '*specific procedures for the assessment and minimum criteria for reporting on identified environmental themes in terms of sections 24(5)(a) and (h) and 44 of the NEMA must be included/considered when applying for Environmental Authorisation.*'

GN R320 prescribes the general requirements for undertaking a site sensitivity verification describes certain protocols for the assessment and minimum report content requirements of environmental impacts for environmental themes for activities requiring environmental authorisation.

9.2 Aquatic Amendment Assessment

A copy of both the Paulputs WEF EIA specialist report and Impact statement are contained in Volume II.

The specialist found that the significance of the impacts as a result of this amendment would remain low after mitigation during the construction, operation and decommissioning phases of the project as the with the exception of road crossings. All the delineated systems with a High Sensitivity, as is required by the Biodiversity Assessment Protocols – Aquatic Theme, will be avoided.

A Water Use Licence will be undertaken where Pylons are to cross drainage lines. This will only be determined should the Paulputs North WEF be deemed a preferred bidder, where-after a final site walkthrough will be undertaken and the pylon micro-siting will be finalised.

9.3 Avifaunal Amendment Assessment

A copy of both the Paulputs WEF EIA specialist report and Impact statement are contained in Volume II.

As this is largely an administrative exercise to ease the transfer of ownership to Eskom it has no significance from an avifaunal perspective and will not result in any changes to the impacts assessed for the original authorisation.

The original assessment (Arcus, 2019) found that the activity and abundance of priority species and red data species were found to be very low to low by the pre-construction monitoring conducted by Arcus between Autumn 2018 to the end of Summer 2019. The diversity of these species recorded was also low. Abundances and diversity of small passerines was found to be low as well.

Verreaux's Eagle were confirmed breeding 1.8 km outside of the proposed Paulputs North WEF site boundary, however the species was not recorded flying on site. The Paulputs North WEF site does not contain any important Verreaux's Eagle habitat, even though they may traverse the site or forage there occasionally.

As the area surrounding the project site is widespread, contiguous, untransformed natural habitat and therefore the small areas that may be impacted upon by the grid connection, thus the impacts of the proposed amendment are considered low.

The grid may negatively impact Avifauna in terms of collisions and electrocutions. Compared to other WEF sites flight activity of priority species was the lowest recorded on any WEF that the specialists have worked on or are aware of. Therefore, the broad project area appears to be well suited for large infrastructure development from an avifaunal perspective. The associated Grid Connection however does have the potential to negatively impact certain species, particularly Ludwig's Bustard. This impact is partially mitigatable and considered acceptable when all mitigations have been applied. The site is considered to be of low avifaunal sensitivity. The mitigation measures proposed are sufficient to reasonably mitigate the proposed negative impacts.

9.4 Terrestrial Ecology Amendment Assessment

Mr Jamie Pote has been appointed to compile an Amendment Statement, on behalf of the applicant, regarding the potential implications of the proposed amendments on Terrestrial Biodiversity. Simon Todd of 3Foxes Biodiversity Solutions compiled the original Fauna & Flora Specialist Study for the Paulputs WEF EIA, which was authorised on 11 December 2019 by the Department of Forestry, Fisheries and the Environment (DFFE Ref. 14/12/16/3/3/2/1120). This Amendment Statement will assess the amendment in relation to the impacts as originally undertaken by 3Foxes Biodiversity Solutions.

A copy of both the Paulputs WEF EIA specialist report and Impact statement are contained in Volume II.

Assessment Findings

Key inclusions in this amendment statement are as follows:

1. Statement from specialists confirming whether or not the proposed amendments will change the nature or impact of any of the impacts that were assessed as part of specialist studies for the Authorised Paulputs WEF.
2. Statements from specialists to confirm whether or not the proposed amendments within the assessed footprint will result in any additional impacts.
3. Statements from specialists to confirm whether any additional management actions or mitigations, inclusive of changes to the EMP, are applicable to the proposed amendments.

Project : Paulputs WEF and Grid Connection Layout Amendments: Paulputs North Grid Connection

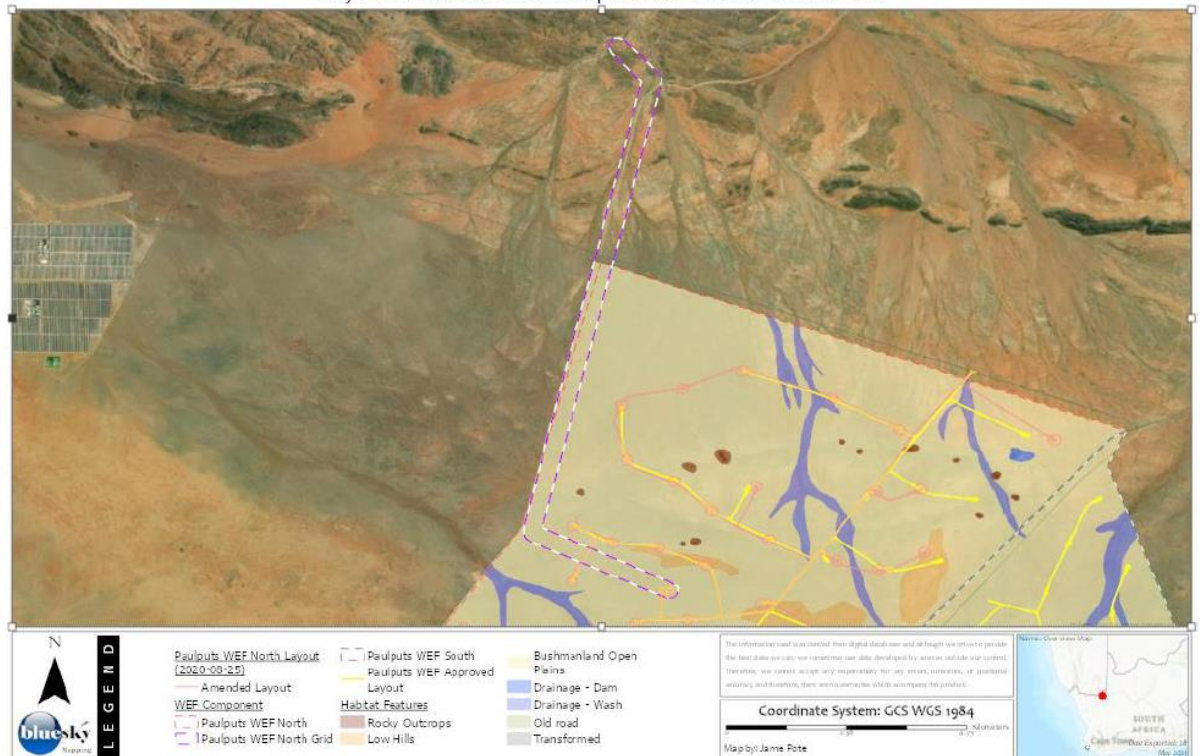


Plate 9-1: Habitat Mapping (as per Todd, 2019) with amended layout (Paulputs North WEF Grid Connection).

With reference to Plate 9-1 above, the following can be deduced regarding the split of the Paulputs WEF into separate Paulputs North, Paulputs North Grid Connection and Paulputs South components:

- The Paulputs North Grid Connection will occupy the same footprint between the site and the substation to the north-east and will not result in a significant change to the overall impact to terrestrial biodiversity.
- In terms of the overall impact, there are no changes in the impacts associated with the single Paulputs WEF and the impacts associated with the combined split North, North Grid and South WEF components.

The specialist found that the 132 kV powerline has a nominal terrestrial biodiversity footprint, limited to minor disturbance to construct pylons and an access road, which is usually a two-track type road, which has a nominal footprint and so long as sensitive areas are avoided, and the respective mitigation measures are implemented the effect of this on the overall project impact is deemed to be negligible.

Mitigation / Recommendations

There have been no changes to the layout of the approved overhead powerline for the Paulputs North WEF. The grid connection will be located in the same area to the original footprint and as such, there are no additional impacts as a result of the amendments are anticipated and the amendments are not anticipated to require any additional management actions or mitigation measures, inclusive of changes to the EMPr.

It is recommended that in terms of terrestrial biodiversity that the amendment be approved, subject to implementation of all recommendations in the original assessment inclusive of the Environmental Management Programme (EMPr) and the conditions of the Environmental Authorisation (EA).

9.5 Soil and Agricultural Amendment Assessment

A copy of both the Paulputs WEF EIA specialist report and Impact statement are contained in Volume II.

Plate 9-2 shows the uniform landscape of the proposed development site. There are no agricultural impacts related to this proposed amendment. There are no agricultural advantages or disadvantages related to it. The amendment does not require any changes or additions to the mitigation measures for agricultural impacts that were recommended for the authorised WEF, and there are therefore no required changes to the EMPr.

The agricultural impact of the amended project will therefore be identical to the impact for the authorised WEF, that was assessed in my original specialist assessment report. Therefore, from an agricultural impact point of view, the amendment should be authorised.



Plate 9-2: Paulputs North WEF Site

9.6 Heritage, Archaeology and Palaeontology Amendment Assessment

A copy of both the Paulputs WEF EIA specialist report and Impact statement are contained in Volume II.

Assessment Findings

The study area is generally very flat but with very low rises in places. The exceptions are a number of small, steep rocky hills that dot the landscape. Watercourses are ephemeral and far more common in the north than the south. Vegetation is sparse, but bushy patches do occur, primarily along the watercourses.

The heritage assessment found that numerous Stone Age archaeological resources occur throughout the WEF study area but that they are generally associated with water sources and rocky hills. The power line routes were not physically examined but some sites may be associated with hills or watercourses along the various options. There is still a small chance that isolated water holes with associated archaeological sites can be located in open areas but these could only be identified once the final facility layout is surveyed before construction.

The landscape is more natural than cultural but will experience visual impacts. The important part of this is that, although not a designated tourism route (SiVest 2019, Visual Impact Assessment), the N14 is considered by the heritage specialist to be a route of cultural significance because of the aesthetic and scenic qualities of the landscape through which it passes. The power line presents a far more limited impact and, if the WEF is constructed then the associated power line would have a negligible further impact.

Impacts

The powerline route for the grid connection was not surveyed during the initial assessment because the alignment could not be accessed at the time. Some areas were noted from aerial photography as being potentially of medium sensitivity. The line does cross a few of these areas.

On the basis of the archaeology, it is unlikely that the power line construction would result in impacts of anything more than medium intensity. Once more, the pre-construction survey will be an important part of the project and will ensure that any as yet undocumented sites can be recorded and sampled, if necessary, prior to their destruction.

Mitigation / Recommendations

The recommendations to be carried forward for the proposed amendment are as follows:

- The final grid route, internal power lines and all internal roads and any other areas to be disturbed must be surveyed by an archaeologist prior to construction in order to identify any remaining potential impacts that may need mitigation;
- Identified sensitive sites must be treated as no-go areas throughout the lifetime of the project; and
- If any archaeological material or human burials are uncovered during the course of development then work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist. Such heritage is the property of the state and may require excavation and curation in an approved institution.

9.7 Visual Amendment Assessment

A copy of both the Paulputs WEF EIA specialist report and Impact statement are contained in Volume II.

Assessment Finding

The VIA for Paulputs WEF identified the visual character of the broader study area as being largely natural with pastoral elements and low densities of human settlement. The study area represents a typical Karoo cultural landscape. This is important in the context of potential visual impacts associated with the development of a WEF and associated infrastructure as introducing this type of development could be considered to be a degrading factor in the context of the natural Karoo character of the study area.

In this instance visual impacts on the cultural landscape would be reduced by the fact that the area is relatively remote and there are very few tourism or nature-based facilities in the study area. In addition, although the proposed development will be visible from the N14 national route, the section of this route that traverses the study area does not form part of a designated tourism route.

Impacts

As this is merely an administrative issue, the proposed amendment has no significance from a visual perspective and will not result in any changes to the visual impacts identified in the original VIA for Paulputs WEF.

9.8 Noise Amendment Assessment

A copy of both the Paulputs WEF EIA specialist report and Impact statement are contained in Volume II.

As proposed amendment involves the removal of infrastructure, it is not possible for the proposed changes to result in an increased noise impact, and are therefore not significant in terms of the EIA Regulations.

9.9 Social Amendment Assessment

A copy of both the Paulputs WEF EIA specialist report and Impact statement are contained in Volume II.

Assessment Findings

The identification and assessment of the key social impacts related the proposed amendment were assessed in detail and included in Section 4 of the full SIA report that formed part of the authorised Paulputs WEF EIA that already received EA by the DFFE.

Therefore, the social impacts that were identified and assessed in the full SIA report (that formed part of the full EIA report that was authorised), as well as the mitigation and enhancement measures included in the full SIA report and any social aspects included in the authorised EMP, are still relevant and valid for this proposed amendment.

Impacts

The findings of the full SIA report demonstrated that the proposed establishment of the WEF is supported as it creates a positive social benefit for society.

Mitigation / Recommendations

Paulputs North are required to implement the suggested enhancement and mitigation measures contained in Section 4 of the full SIA report, as well as inputs from other specialist studies for the authorised Paulputs WEF EIA.

9.10 Traffic Amendment Assessment

A copy of both the Paulputs WEF EIA specialist report and Impact statement are contained in Volume II.

The findings, recommendations and management measures as contained in the authorised Traffic Impact Assessment (TIA) (11 July 2019) are still valid.

It is also noted that only slight changes have been made to the internal access roads. As such, the above changes do not impact on the Traffic Specialist Report findings and recommendations as stated in the authorised Paulputs WEF EIA.

A transport management plan must be compiled and must consider the logistics of transporting abnormal loads to site. This plan must be compiled after preferred bidder is awarded.

9.11 Cumulative Impact

The cumulative impact of the facility as a whole was considered and assessed in detail in the authorised Paulputs WEF EIA. The authorised EIA concluded that there are no negative high residual impacts, including potential cumulative impacts associated with the proposed development of the WEF, grid connection option and substation options.

The creation of local employment and business opportunities, skills development and training which can be associated with cumulative impacts, was rated as high positive. With mitigation all potential negative cumulative impacts are reduced to medium or low significance. Potential cumulative negative impacts that remain medium significance after mitigation were identified by the bird, heritage, social and visual specialists while a potential cumulative positive impact of high significance after enhancement was identified by the social specialist. The negative impacts associated with the proposed Paulputs WEF Grid Connection are considered acceptable by the specialist.

10 SPECIALIST IMPACT STATEMENT

- **Aquatic Amendment Assessment** – No additional impacts. Further, no changes to the original mitigations or EMP recommendations are required.
- **Avifaunal Amendment Assessment** - As this is largely an administrative exercise to ease the transfer of ownership to Eskom, thus this amendment has no significance from an avifaunal perspective and will not result in any changes to the impacts assessed for the original authorisation.
- **Terrestrial Ecology Amendment Assessment** – The Paulputs North Grid Connection will occupy the same footprint between the site and the substation to the north-east and will not result in a significant change to the overall impact to terrestrial biodiversity. In terms of the overall impact, there are no changes in the impacts associated with the single Paulputs WEF and the impacts associated with the combined split North, North Grid and South WEF components.
- **Bat Amendment Assessment** - As this is largely an administrative exercise to ease the transfer of ownership to Eskom, thus this amendment has no significance from a bat perspective and will not result in any changes to the impacts assessed for the original authorisation.
- **Soil, Land Use and Agricultural Potential Amendment Assessment** - There are no agricultural impacts related to this proposed amendment. In addition, there are no agricultural advantages or disadvantages related to it. The proposed amendment does not require any changes or additions to the mitigation measures for agricultural impacts that were recommended for the authorised Paulputs WEF.
- **Heritage, Archaeology and Palaeontology Amendment Assessment** - On the basis of the archaeology seen in the Paulputs North WEF site and of other sites known by the author to occur in the wider area, it is unlikely that the power line construction would result in a change in impacts. Impact remains valid from the authorised Paulputs WEF EIA and are no more than medium intensity.

- **Visual Amendment Assessment** – As this is merely an administrative issue, the proposed amendment has no significance from a visual perspective and will not result in any changes to the visual impacts identified in the original VIA for authorised Paulputs WEF.
- **Noise Amendment Assessment** - As this is merely an administrative issue, the proposed amendment has no significance from a noise perspective and will not result in any changes to the noise impacts identified in the original noise impact assessment for authorised Paulputs WEF.
- **Social Amendment Assessment** - The proposed amendment will not result in any additional impacts, cumulative impacts or residual impact, nor will it change the significance of these impacts. The Paulputs North Grid connection must ensure compliance with the recommendations of Section 4 of the approved SIA for the Paulputs WEF.
- **Traffic Amendment Assessment** – The proposed amendment does not change the Traffic Specialist Report findings and recommendations as stated in the authorised Paulputs WEF EIA. A transport management plan must be compiled and must consider the logistics of transporting abnormal loads to site. This plan must be compiled after preferred bidder is awarded.

10.1 Advantages and Disadvantages

Specialists were requested to provide an opinion on the advantages and disadvantages of the proposed amendment application (as above).

Thus, there are **no advantages or disadvantages** related to this proposed amendment and the impacts of the amendment are neutral based on the specialists perspectives.

11 CONCLUSION AND RECOMMENDATIONS

This amendment application is being undertaken to identify and assess environmental impacts, issues and concerns that may result from the proposed amendment to the Environmental Authorisation. The information contained in this report will enable the DFFE to make an informed decision to grant or deny the proposed Environmental Amendment Application.

No further recommendations are required to be considered or included in the EA and EMPr.

It is the opinion of the EAP that the proposed project amendment will not affect any change in the impact ratings from those which were assessed during the Paulputs WEF EIA undertaken by Arcus in August 2019.

The **proposed amendment can be authorised** subject to Paulputs North adhering to all mitigation and management measures outlined in this report, the approved Paulputs WEF EIA as well as the EMPr.

APPENDED FIGURES

APPENDIX A: EAP DECLARATION OF INDEPENDENCE AND CV

APPENDIX B: ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT

APPENDIX C: PUBLIC PARTICIPATION REPORT