



EnviroSci (Pty) Ltd
Reg No 2018/462716 /07

Dr Brian Colloty
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6070

17 February 2021

To whom it may concern

AQUATIC ASSESSMENT OPINION ON THE PROPOSED AMENDMENT OF THE AUTHORISED PAULPUTS WIND ENERGY FACILITY

EnviroSci (Pty) Ltd was appointed to review the proposed amendments against the previous aquatic impact assessment compiled and submitted by the undersigned. Paulputs Wind Energy Facility RF (Pty) Ltd ('PWEF') received Environmental Authorisation on 11 December 2019 for the construction and operation of the 140MW Paulputs Wine Energy Facility. Following receipt of the authorisation, the client has proposed that three Part 2 amendment applications and one Basic Assessment application be compiled and submitted to the DEA for consideration of authorisation. This statement will focus on the following two amendment application referred to as 'Paulputs North WEF' as well as the 'Paulputs North WEF Grid Connection' amendments.

The Paulputs WEF is authorised for the maximum height to tip of the blade of 230m, with a hub height of up to 140m, a rotor diameter of up to 180m and a blade length of up to 90m. Paulputs Wind Energy Facility North (RF) (Pty) Ltd ('Paulputs North') intends to construct and operate a 150MW WEF (Paulputs North WEF) consisting of up to 40 turbines, with a hub height of up to 180m, blade length of up to 110m (constraint already considered for bat and bird sensitivity) and a rotor diameter of up to 220m. Further PWEF give permission to Paulputs Wind Energy Facility North (RF) (Pty) Ltd to remove the authorised 132 kV Grid Connection (Authorised by name of Option C) from its authorisation in favour of ownership by Paulputs Wind Energy Facility North (RF) (Pty) Ltd ('Paulputs North') for use at the Paulputs North WEF site. The grid connection and substation will be taken over by Eskom in the future and thus requires its own Environmental Authorisation. All infrastructure is to be located on the north west of the N14 Highway.

The aforementioned amendments have little bearing on the aquatic environment as the footprints would not result in any changes to the impacts previous assessed. Therefore the significance of the impacts 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 Pylon are to cross drainage lines.

In conclusion, the final impact of the proposed amendments on the aquatic ecological environment with mitigation will remain unchanged from the original impact assessment, i.e. it will remain of low significance. Thus, based on the findings of this study, the specialist has no objection to the approval of the proposed amendment. Similarly, in the assessment of potential cumulative impacts, no additional impacts or changes to the previously assessed impacts would be required due to the proposed amendment. Further, no changes to the original mitigations or EMPr considerations are required.

Dr Brian Colloty
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environmental affairs

Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

DETAILS OF THE SPECIALIST, DECLARATION OF INTEREST AND UNDERTAKING UNDER OATH

	(For official use only)
File Reference Number:	
NEAS Reference Number:	DEA/EIA/
Date Received:	

Application for authorisation in terms of the National Environmental Management Act, Act No. 107 of 1998, as amended and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended (the Regulations)

PROJECT TITLE

PROPOSED AMENDMENT OF THE AUTHORISED PAULPUTS WIND ENERGY FACILITY, NORTHERN CAPE PROVINCE

Kindly note the following:

1. This form must always be used for applications that must be subjected to Basic Assessment or Scoping & Environmental Impact Reporting where this Department is the Competent Authority.
2. This form is current as of 01 September 2018. It is the responsibility of the Applicant / Environmental Assessment Practitioner (EAP) to ascertain whether subsequent versions of the form have been published or produced by the Competent Authority. The latest available Departmental templates are available at <https://www.environment.gov.za/documents/forms>.
3. A copy of this form containing original signatures must be appended to all Draft and Final Reports submitted to the department for consideration.
4. All documentation delivered to the physical address contained in this form must be delivered during the official Departmental Officer Hours which is visible on the Departmental gate.
5. All EIA related documents (includes application forms, reports or any EIA related submissions) that are faxed; emailed; delivered to Security or placed in the Departmental Tender Box will not be accepted, only hardcopy submissions are accepted.

Departmental Details

Postal address:

Department of Environmental Affairs
Attention: Chief Director: Integrated Environmental Authorisations
Private Bag X447
Pretoria
0001

Physical address:

Department of Environmental Affairs
Attention: Chief Director: Integrated Environmental Authorisations
Environment House
473 Steve Biko Road
Arcadia

Queries must be directed to the Directorate: Coordination, Strategic Planning and Support at:
Email: EIAAdmin@environment.gov.za

1. SPECIALIST INFORMATION

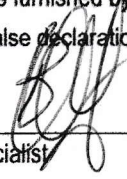
Specialist Company Name:	EnviroSci (Pty) Ltd		
B-BBEE	Contribution level (indicate 1 to 8 or non-compliant)	4	Percentage Procurement recognition
			100
Specialist name:	Dr Brian Colloty		
Specialist Qualifications:	Ph.D Botany / aquatic sciences		
Professional affiliation/registration:	SACNASP Pr Sci Nat Ecology 400268/07		
Physical address:	1 Rossini Rd Pari Park PE		
Postal address:	As Above		
Postal code:	6070	Cell:	0834983299
Telephone:	0413662077	Fax:	-
E-mail:	b.colloty@gmail.com		

2. DECLARATION BY THE SPECIALIST

I, Brian Colloty, declare that –

- I act as the independent specialist in this application;
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- all the particulars furnished by me in this form are true and correct; and
- I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.

Signature of the Specialist



EnviroSci (Pty) Ltd

Name of Company:

Date

21/7/2021

Pot. G. J. ... 2021-07-21 ... 11:10
 (HARDEKENING) KOMMISSARIS VAN EDE
 (SIGNATURE) COMMISSIONER OF OATHS
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 VOLLE VOORNAAM EN VAN IN DRUKSKRIF
 FULL FIRST NAMES AND SURNAME IN BLOCK LETTERS
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 BESIGHEIDSADRES (STRAATADRES)
 BUSINESS ADDRESS (STREET ADDRESS)
 Pot. G. J. ...
 RANG/RANK

SUID-AFRIKAANSE POLISDIENST
 DIST. 14
 DOCKET STORE
 2021 -07- 21
 WALMER
 SOUTH AFRICAN POLICE SERVICE

3. UNDERTAKING UNDER OATH/ AFFIRMATION

I, Brian Colloty, swear under oath / affirm that all the information submitted or to be submitted for the purposes of this application is true and correct.



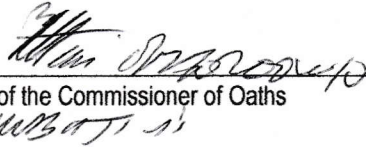
Signature of the Specialist

EnviroSci (Pty) Ltd

Name of Company

21/7/2021

Date


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Signature of the Commissioner of Oaths

Date 2021-07-21



Appendix 1: Site verification report, as per the DEFF Screening Tool

In the assessment of the proposed amendment, the Aquatic Biodiversity Specialist Assessment (Enviro Sci Pty Ltd, 2019 and 2021) was reviewed against the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Aquatic Biodiversity (Government Notice 320, dated 20 March 2020), a site sensitivity verification was undertaken in order to confirm the current land use and environmental sensitivity of the proposed project area as identified by the National Web-Based Environmental Screening Tool (Screening Tool).

The details of the site sensitivity verification are noted below:

Date of Site Visit	Late May 2010, July 2014, April 2016, October 2018
Specialist Name	Dr Brian Colloty
Professional Registration Number	400268/07
Specialist Affiliation / Company	Lead author of 7 July 2019 Report

Government Notice No. 320, dated 20 March 2020, includes the requirement that an Initial Site Sensitivity Verification Report must be produced for a development footprint. As per Part 1, Section 2.3, the outcome of the Initial Site Verification must be recorded in the form of a report that-

- Confirms or disputes the current use of the land and environmental sensitivity as identified by the national web based environmental screening tool;
- Contains a motivation and evidence of either the verified or different use of the land and environmental sensitivity;
- Is submitted together with the relevant reports prepared in accordance with the requirements of the Environmental Impact Assessment Regulations.

This report has been produced specifically to consider the aquatic biodiversity theme and addresses the content requirements of (a) and (b) above. The report will be appended to the respective specialist study included in the Amendment Report produced for the project.

Site sensitivity based on the aquatic biodiversity theme included in the Screening Tool and specialist assessment

Based on the DEFF Screening Tool, the Paulputs North WEF and Paulputs South WEF were rated Very High sensitivity due to rivers, wetlands / Estuaries and/or Freshwater ecosystem priority area quinary catchments present (See Figure 1 and 2 below).

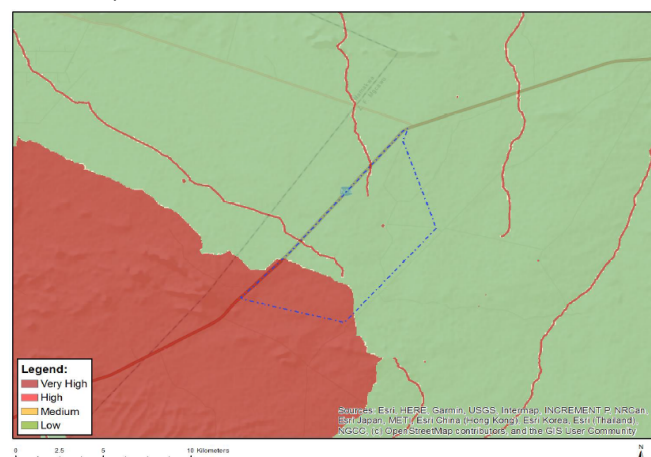


Figure 1. DEFF Screening Tool outcome for the aquatic biodiversity theme for Paulputs South WEF

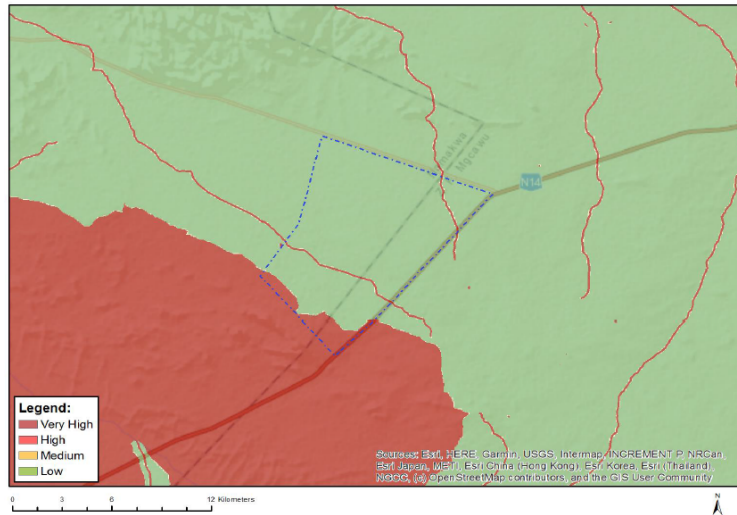


Figure 1. DEFF Screening Tool outcome for the aquatic biodiversity theme for Paulputs North WEF

The specialist confirms that 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.



Plate 1: A view of the typical small water course within the study area



Plate 2: The Kaboep River near the Orange River confluence

The Present Ecological State (PES) of the Rivers

The Present Ecological State of a river represents the extent to which it has changed from the reference or near pristine condition (Category A) towards a highly impacted system where there has been an extensive loss of natural habit and biota, as well as ecosystem functioning (Category E).

The national Present Ecological Score or PES scores have been revised for the country and based on the new models, aspects of functional importance, as well as direct and indirect impacts - have been included (DWS, 2014). The new PES system also incorporates EI (Ecological Importance) and ES (Ecological Sensitivity) separately as opposed to EIS (Ecological Importance and Sensitivity) in the old model. Although the new model is still heavily centered on rating rivers using broad fish, invertebrate, riparian vegetation and water quality indicators.

The Present Ecological State scores (PES) for the drainage lines and the rivers in the study area was rated as follows (DWS, 2014 – where D = Largely Modified and E= Critically modified):

Subquaternary Catchment Number	Present Ecological State	Ecological Importance	Ecological Sensitivity
3445	B	High	High
3449	C	High	High

In general aquatic features are avoided as far as possible and are limited to road crossings where necessary. The significance of the impact would remain low after mitigation during the construction, operation and decommissioning phases of the Paulputs South WEF 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.

Motivation of the outcomes of the sensitivity map and key conclusions.

In conclusion, the finding of the DEFF Screening Tool can be upheld. With regard the wind farm (North and South) components, these will all be located within LOW aquatic sensitive areas and all High Sensitive Areas have been avoided.