

Dr Brian Colloty Ecologist (Pr Sci Nat 400268/07) Member of the South African Wetland Society

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17 February 2021

To whom it may concern

AQUATIC ASSESSMENT OPINION ON THE PROPOSED PAULPUTS SOUTH WIND ENERGY FACILITY GRID CONNECTION AND SUBSTATION YARD BASIC ASSESSENT

The Applicant, Paulputs Wind Energy Facility South (RE) (Pty) Ltd ('Paulputs South'), intends to apply for Environmental Authorisation for the construction and operation of the Paulputs South WEF Grid Connection and associated infrastructure - which includes a substation yard and BESS (hereon referred to as the 'proposed development'). The preferred site layout and technical specifications of this proposed development was assessed by EnviroSci (Pty) Ltd in the approved 300MW Paulputs Wind Energy Facility (WEF) Environmental Impact Assessment (EIA), undertaken by Arcus Consulting Services South Africa ('Arcus') in 2019. EnviroSci (Pty) Ltd was appointed to confirm that the findings of the 2019 report are current and valid for the bA application.

As part of the original Environmental Impact Assessment (EIA), three alternative Grid Connection options (A, B and C) and three alternative on-site substation options (A, B and C) were assessed during the site visits and reporting period. It is understood from Arcus that the Competent Authority (CA), DEFF, chose to only issue a favourable authorisation for the preferred Grid Connection option 'C' and on-site substation option 'A'. As such, Paulputs South would like to apply for authorization for remaing Options to facilitate the evacuation of electricity from the Paulputs South WEF, located on the east of the N14 highway.

The aforementioned application has little bearing on the aquatic environment as the footprint would not result in any changes to the impacts previous assessed. The addition of BESS has little to no bearing on the impacts previously assessed. The area earmarked for the BESS development was assessed as part of the laydown facilities for the authorised Paulputs WEF and therefore the assessment footprint remains valid.

Therefore the significance of the impact 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 Sensitivty, as is required by the Biodivesity Assessment Protocols – Aquatic Theme, will be avoided. A Water Use Licence will be applied for should any Section 21 water uses be triggered in terms of the National Water Act (NWA).

In conclusion, the final impact of the proposed development 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 development. 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 development. Further, no changes to the original mitigations or EMPr considerations are required.

Ringley

Dr Brian Colloty

Cell: 083 498 3299



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.
- 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-BBÉE	Contribution level (indicate 1 to 8	4		Percentage		100
	or non-compliant)	<u> </u>		Procureme	ent recognition	
Specialist name:	Dr Brian Colloty					
Specialist Qualifications:	Ph.D Botany / aquatic sciences					
Professional affiliation/registration:	SACNASP Pr Sci Nat Ecology 40026	68/07				
Physical address:	1 Rossini Rd Pari Park PE					Area
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Postal code:	6070		Cell:		0834983299	
Telephone:	0413662077		Fax:		-	
E-mail:	b.colloty@gmail.com			The state of the s		
2. DECLARATION BY THE SPEC	IALIST					
I,Brian Colloty	, declare that –					
I act as the independent specia	list in this application:					
	to the application in an objective man	nner, even i	f this re	esults in vie	ws and findings	that are not favourable t
I declare that there are no circu	imstances that may compromise my ol	bjectivity in i	perform	ning such w	ork;	
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	lations and all other applicable legislat					
 I have no, and will not engage i 	in, conflicting interests in the undertaki	ng of the ac	ctivity;			
 I undertake to disclose to the 	applicant and the competent authority	all materia	al inform	nation in m	y possession th	nat reasonably has or ma
have the potential of influencing	g - any decision to be taken with respe	ect to the ap	oplication	on by the co	mpetent author	rity; and - the objectivity
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 I realise that a false declaration 	is an offence in terms of regulation 48	3 and is pun	ishable	in terms of	section 24F of	the Act.
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Signature of the Specialist						
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EnviroSci (Pty) Ltd					regregation particularly the production of the second	
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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-

- (a) Confirms or disputes the current use of the land and environmental sensitivity as identified by the national web based environmental screening tool;
- (b) Contains a motivation and evidence of either the verified or different use of the land and environmental sensitivity;
- (c) 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 <u>Very High</u> sensitivity due to rivers, wetlands / Esturies and/or Freshwater ecosystem priority area quinary catchments present (See Figure 1 and 2 below).

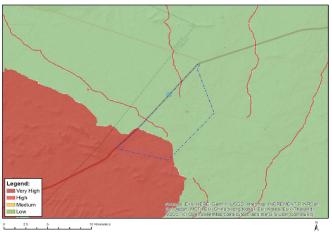


Figure 1. DEFF Screening Tool outcome for the aquatic biodiversity theme for Paulputs South WEF

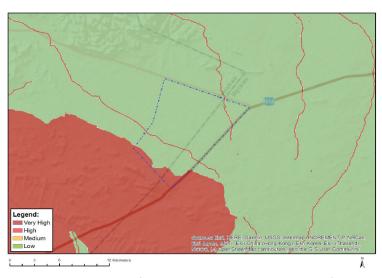


Figure 1. DEFF Screening Tool outcome for the aquatic biodiversity theme for Paulputs North WEF

The secialist 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	В	High	High
3449	С	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.