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WSP GROUP AFRICA

13/12/2022 14:00

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1201 Nelspruit
Nelspruit
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APPENDIX

B-8 APPROVAL OF FINAL SCOPING REPORT



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447· PRETORIA 0001· Environment House 473 Steve Biko Road, Arcadia· PRETORIA

DFFE Reference: 14/12/16/3/3/2/2243

Enquiries: [REDACTED]

Telephone: [REDACTED] E-mail: [REDACTED]

Ms Ashlea Strong
WSP Group Africa (Pty) Ltd
WSP House Building C Knightsbridge
33 Sloane Street
BRYANSTON
2191

Telephone Number: (011) 361 1392
Email Address: Ashlea.strong@wsp.com

PER E-MAIL

Dear Ms Strong

ACCEPTANCE OF THE SCOPING REPORT FOR THE PROPOSED DALMANUTHA WIND ENERGY FACILITY (WEF) AND ITS ASSOCIATED INFRASTRUCTURE NEAR BELFAST IN MPUMALANGA PROVINCE

The final Scoping Report (SR) and the Plan of Study for Environmental Impact Assessment dated February 2023 and received by the Department on 10 February 2023, refer.

The Department has evaluated the submitted final SR and the Plan of Study for Environmental Impact Assessment dated February 2023 and is satisfied that the documents comply with the minimum requirements of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended. The final SR is hereby accepted by the Department in terms of Regulation 22(1)(a) of the EIA Regulations, 2014, as amended.

You may proceed with the environmental impact assessment process in accordance with the tasks contemplated in the Plan of Study for Environmental Impact Assessment as required in terms of the EIA Regulations, 2014, as amended.

In addition, the following amendments and additional information are required for the EIAr:

(a) Specific Comments

- (i) The final SR mentions an option to include Solar PV panels which would be added for consideration in the EIA Phase. The only information regarding the inclusion of the Solar PV panels is mentioned under the technology alternative (page 39) and the revised project details (page 213), which only provides the height and mounting structures of the proposed Solar PV panels. Please take note that if the applicant plans to develop a hybrid energy facility a comprehensive assessment for both renewable energy generation types need to be conducted and included in the EIAr. Currently none of the specialist scoping reports and impact assessments mention the inclusion of Solar PV panels. The insufficient information regarding the inclusion of the Solar PV panels in the final SR is concerning as the applicant should be

JCA

fully aware of what activities would be undertaken at this point in the process in order to effectively assess the impacts on site. The proposed activities described in the EIAr must be final, clear, and concise.

- (ii) A Biodiversity Offset Report is planned to be included in the EIAr as the proposed site is covered in areas classified as a CBA 1, with very high sensitivities confirmed in terms of avifauna, primary grasslands, and PES A/B wetlands. Kindly take note that the draft National Biodiversity Offset Guideline should be utilised to inform the proposed Biodiversity Offset Report.

(b) Listed Activities

- (i) The description of each Activity applied for in the application form is unclear and difficult to understand. Find examples below:

- Activity 4(f)(i)(bb)(cc)(ee)(gg) of Listing Notice 3
*“Internal access roads required by the Facility will be between 8m and 10m wide, and approximately 60km in length. Where required for turning circle/bypass areas, however, access or internal roads may be up to 12m to allow for larger component transport. The exact values will be confirmed once final designs have been provided. **The facility is therefore both located within the extent, and within 5km of the abovementioned heritage site.**”*
- Activity 14(ii)(a)(c) (f)(i)(bb)(cc)(dd)(ff)(hh) of Listing Notice 3
*“The Facility will require the development of internal roads and/or access roads around the site. The physical footprint of internal access roads, stormwater control infrastructure and electrical cabling required to connect the various components of the Facility will either traverse the delineated watercourses on site or be located within 32m of the outer extent of the delineated watercourses on site. **The facility is therefore both located within the extent, and within 5km of the abovementioned heritage site.** This site is noted as having farming activity present and is currently managed and actively utilised for agriculture.”*

It is unclear as to what heritage site is being referred to and what extent does the facility fall within? Kindly update the application form so that the description of each activity applied for is clear, applicable, and concise.

- (ii) The EIAr must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.
- (iii) The listed activities represented in the EIAr and the application form must be the same and correct.
- (iv) The EIAr must assess the correct sub listed activity for each listed activity applied for.

(c) Public Participation

- (i) Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAr. This includes but is not limited to the Mpumalanga Department Agriculture, Rural Development, Land and Environment Affairs (DARDLEA), the Emakhazeni Local Municipality, the Nkangala District Municipality, the Gert Sibande District Municipality, the Albert Luthuli Local Municipality, the Department of Water and Sanitation (DWS), the South African Heritage Resources Agency (SAHRA), the Mpumalanga Heritage Resources Agency (MHRA), the Mpumalanga Tourism and Parks Agency, the Endangered Wildlife Trust (EWT), BirdLife SA, the South African Bat Assessment Association (SABAA), the Department of Mineral Resources and Energy, the Department of Forestry, Fisheries and the Environment: Directorate Biodiversity and Conservation.
- (ii) Please ensure that all issues raised and comments received during the circulation of the draft SR and draft EIAr from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final EIAr. Proof of correspondence with the various stakeholders must be included in the final EIAr. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.

- (iii) A Comments and Response trail report (C&R) must be submitted with the final EIAr. The C&R report must incorporate all comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Annexure 1 of this comments letter. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as “noted” is not regarded as an adequate response to I&AP’s comments.
- (iv) Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.
- (v) The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 and 44 of the EIA Regulations, 2014, as amended.

(d) Layout & Sensitivity Maps

- (i) The EIAr must provide coordinate points for the proposed development site and all proposed infrastructure (note that if the site has numerous bend points, at each bend point coordinates must be provided) as well as the start, middle and end point of all linear activities.
- (ii) All preferred turbine positions must be clearly numbered. The turbine position numbers must be consistently used in all maps to be included in the reports.
- (iii) The EIAr must provide a copy of the final preferred layout map. 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:
 - a) A clear indication of the envisioned area for the proposed wind energy facility;
 - b) Position of the wind turbines;
 - c) Internal roads;
 - d) All supporting onsite infrastructure such as laydown area, guard house and control room etc.;
 - e) Substations, transformers, switching stations and inverters;
 - f) Battery Energy Storage System;
 - g) The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected by the facilities and its associated infrastructure;
 - h) Connection routes (including pylon positions) to the distribution/transmission network;
 - i) All existing infrastructure on the site, especially railway lines and roads; and
 - j) Buildings, including accommodation.
- (iv) Please provide an environmental sensitivity map which indicates the following:
 - a) The location of sensitive environmental features identified on site, e.g. CBAs, protected areas, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure;
 - b) Buffer areas; and
 - c) All “no-go” areas.
- (v) The above layout map must be superimposed (overlain) with the sensitivity map and a cumulative map which shows neighbouring and existing infrastructure.
- (vi) Google maps will not be accepted.

(e) Specialist assessments

- (i) The EAP must ensure that the terms of reference for all the identified specialist studies must include the following:
 - a) A detailed description of the study’s methodology; indication of the locations and descriptions of the development footprint, and all other associated infrastructures that they have assessed and are recommending for authorisation.
 - b) Provide a detailed description of all limitations to the studies. All specialist studies must be conducted in the right season and providing that as a limitation will not be allowed.

- c) Please note that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the 'no-go' areas.
- d) Should the specialist definition of 'no-go' area differ from the Department's definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.
- e) **All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.**
- f) **Bird and bat specialist studies must have support from Birdlife South Africa and SABAA.**
- g) Should a specialist recommend specific mitigation measures, these must be clearly indicated.
- (ii) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expert advice.
- (iii) It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting in identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols") and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. **Please note that specialist assessments must be conducted in accordance with these protocols.**
- (iv) Please also ensure that the EIAR includes the Site Verification Report and Compliance Statements (where applicable) as required by the relevant themes.
- (v) Please note further that the protocols, if applicable, require certain specialists' to be SACNASP registered. Please ensure that the relevant specialist certificates are attached to the relevant reports.
- (vi) As such, the Specialist Declaration of Interest forms must also indicate the scientific organisation registration/member number and status of registration/membership for each specialist.
- (vii) The following Specialist Assessments will form part of the EIAR:
 - Soils and Agricultural Potential Assessment;
 - Archaeological and Cultural Heritage Assessment;
 - Palaeontology Impact Assessment;
 - Visual Impact Assessment (inclusive of the Landscape and Flicker Assessments);
 - Biodiversity Impact Assessment (inclusive of terrestrial biodiversity, plant species and animal species);
 - Surface water Assessment;
 - Avifauna Impact Assessment;
 - Bat Impact Assessment;
 - Environmental Acoustic (Noise) Impact Assessment;
 - Social Impact Assessment;
 - Qualitative Risk Assessment (specific to the BESS);
 - Desktop Geotechnical Assessment;
 - Desktop Traffic Assessment; and
 - Biodiversity Offset Strategy.

(f) Cumulative Assessment

- (i) Should there be any similar projects within a 30km radius of the proposed development site, a cumulative impact assessment for all identified and assessed impacts must be conducted to indicate the following:
 - a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.

- b) Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.
- c) The cumulative impacts significance rating must also inform the need and desirability of the proposed development.
- d) A cumulative impact environmental statement on whether the proposed development must proceed.

(g) General

- (ii) The EIA must provide the technical details for the proposed facility in a table format as well as their description and/or dimensions. A sample for the minimum information required is listed under Annexure 2 below.
- (iii) The EAP must provide landowner consent for all farm portions affected by the proposed project i.e., all farm portions where the access road, wind turbines and associated infrastructure are to be located.
- (iv) A construction and operational phase EMP that includes mitigation and monitoring measures must be submitted with the final EIA, including the Generic EMPs for substations.

The applicant is hereby reminded to comply with the requirements of Regulation 45 of GN R982 of 04 December 2014, as amendment, with regard to the time period allowed for complying with the requirements of the Regulations.

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.

Yours faithfully

[Redacted Signature]

Acting Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment
Signed by: [Redacted]
Designation: Deputy Director: Priority Infrastructure Projects
Date: 24 March 2023

cc:	[Redacted]	Dalmanutha Wind (RF) Pty Ltd	Email	[Redacted]
	[Redacted]	MDARDLEA	Email	[Redacted]
	[Redacted]	Nkangala District Municipality	Email	[Redacted]
	[Redacted]	Emakhazeni Local Municipality	Email	[Redacted]
	[Redacted]	Gert Sibande District Municipality	Email	[Redacted]

Annexure 1: Format for Comments and Response Trail Report

Date of comment, format of comment name of organisation/I&AP	Comment	Response from EAP/Applicant/Specialist
27/01/2016 Email Department of Forestry, Fisheries and the Environment: Priority Infrastructure Projects (John Doe)	Please record C&R trail report in this format Please update the contact details of the provincial environmental authority	EAP: (Noted) The C&R trail report has been updated into the desired format, see Appendix K EAP: Details of provincial authority have been updated, see page 16 of the Application form

Annexure 2: Sample of technical details for the proposed facility

Component	Description / dimensions
Location of the site	
The total area of the site	
Total disturbance footprint	
Maximum generation capacity for facility	
Number of Turbines	
Hub Height from ground level	
Rotor top tip height	
Rotor bottom tip height	
Blade Length	
Rotor Diameter	
Turbine Foundations	
Turbine Hardstands and Laydown Areas	
Capacity of on-site substation and footprint	
Battery Energy Storage System (BESS) and footprint	
Cables and Overhead Power line	
Area occupied by both permanent and construction laydown areas	
Length of internal roads	
Width of internal roads	

APPENDIX

B-9 *REQUEST FOR EXTENTION LETTER AND DFFE RESPONSE LETTER.*



Furthermore, all specialists required additional time to assess the associated impacts and mitigation measures that may result from a Hybrid Facility. Furthermore, each specialist is now required to conduct a comprehensive assessment for both a Wind Energy Alternative as well as a Hybrid Alternative for inclusion in the Draft EIA Report.

The additional time is required to ensure that the DFFE's comment outlined in the Acceptance of the Final Scoping Report Letter (received on 24 March 2023) is fulfilled:

The final SR mentions an option to include Solar PV panels which would be added for consideration in the EIA Phase. The only information regarding the inclusion of the Solar PV panels is mentioned under the technology alternative (page 39) and the revised project details (page 213), which only provides the height and mounting structures of the proposed Solar PV panels. Please take note that if the applicant plans to develop a hybrid energy facility a comprehensive assessment for both renewable energy generation types need to be conducted and included in the EIAR. Currently none of the specialist scoping reports and impact assessments mention the inclusion of Solar PV panels. The insufficient information regarding the inclusion of the Solar PV panels in the final SR is concerning as the applicant should be fully aware of what activities would be undertaken at this point in the process in order to effectively assess the impacts on site. The proposed activities described in the EIAR must be final, clear, and concise.

Considering the above, WSP kindly requests and would appreciate the granting of a 30-day extension on the project timeframes by the DFFE. If granted, the extension would result in a new deadline for submission of the FEIR on 11 August 2023.

We remain available should any aspect of this request require discussion or clarification.

Kindly confirm receipt hereof, we trust you will find this in order.

Yours faithfully

Digitally signed by Ashlea Strong
DN: cn=Ashlea Strong, c=ZA,
o=WSP Group Africa, ou=Earth
and Environment,
email=ashlea.strong@wsp.com
Date: 2023.04.05 16:50:20 +02'00'

Ashlea Strong
Principal Associate

cc: Thirushan.Nadar@wsp.com and Mmakoena.Mmola@enertrag.com



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447· PRETORIA ·0001· Environment House 473 Steve Biko Road, Arcadia,· PRETORIA

DFFE Reference: 14/12/16/3/3/2/2243

Enquiries

Telephone: (012) 399 940

Ms Ashlea Strong
WSP Group Africa (Pty) Ltd
WSP House Building C Knightsbridge
33 Sloane Street
BRYANSTON
2191

Telephone Number: (011) 361 1392
Email Address: Ashlea.strong@wsp.com

PER E-MAIL

Dear Ms Strong

REFUSAL OF REQUEST IN TERMS OF REGULATION 3(7) OF THE EIA REGULATIONS, 2014, AS AMENDED FOR THE PROPOSED DALMANUTHA WIND ENERGY FACILITY (WEF) AND ITS ASSOCIATED INFRASTRUCTURE NEAR BELFAST IN MPUMALANGA PROVINCE

The application for Environmental Authorisation and the draft Scoping Report (SR) received on 09 December 2022, the final SR received on 10 February 2023 and accepted on 27 March 2023, and your request for extension in terms of Regulation 3(7) of the EIA Regulations, 2014, as amended dated 05 April 2023, refer.

This Department is awaiting the final Environmental Impact Assessment Report (EIAR) which must be submitted to this Department on or before 13 July 2023 in terms of Regulation 23(1) of the EIA Regulations 2014, as amended.

This Department received correspondence in the form of a letter from WSP Group Africa (Pty) Ltd on 05 April 2023 requesting an extension of the prescribed one hundred and six (106) day timeframe within which the final EIAR was to be submitted to the Department.

Based on the information received from the Environmental Assessment Practitioner (EAP), the extension is required due to the late addition of solar technology to the project description. The applicant requires additional time to define the project requirements for the Hybrid Alternative and to provide all specialists with additional time to assess the associated impacts and mitigation measures that may result from a Hybrid Facility.

Regulation 3(7) of the EIA, 2014, as amended states that *"In the event where the scope of work must be expanded based on the outcome of an assessment done in accordance with these Regulations, which outcome could not be anticipated prior to the undertaking of the assessment, or in the event where exceptional circumstances can be demonstrated, the competent authority may, prior to the lapsing of the relevant prescribed timeframe, in writing, extend the relevant prescribed timeframe and agree with the applicant on the length of such extension."*

The EAP requests a thirty (30) day extension, to define the project requirements for the Hybrid Alternative such that the proposed activities are final, clear, and concise. The extension would provide all specialists with additional time to assess the associated impacts and mitigation measures that may result from a Hybrid Facility.

Based on the motivation provided by the EAP, this Department has decided not to grant the extension of the timeframes to submit the final EIA. This Department is of the opinion that the reasons provided in the application for an extension do not constitute exceptional circumstances. The applicant was aware of the addition of the solar option as it was mentioned in the final SR. This Department brought it to the attention of the EAP that if a hybrid facility is being planned as an alternative then a comprehensive assessment for both renewable energy generation types need to be conducted and included in the EIA. This is not deemed as unforeseen or exceptional as it was presented in the SR. Your attention is drawn to Appendix 2 (2)(1)(g)(h), and Appendix 3 (1)(h) of the EIA Regulations 2014, as amended which states that all alternatives must be considered.

Regulation 45 of the EIA Regulations, 2014, as amended states that "*An application in terms of these Regulations lapses, and a competent authority will deem the application as having lapsed, if the applicant fails to meet any of the time-frames prescribed in terms of these Regulations, unless extension has been granted in terms of regulation 3(7).*"

As such, this Department hereby advises that you must submit the final EIA in terms of Regulation 23(1). Failure to submit the final EIA in terms of Regulation 23(1), will result in the application lapsing in terms of Regulation 45.

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.

Should you have any queries or wish to discuss the points raised above, please do not hesitate to contact our offices.

Yours faithfully


Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment

Letter signed by: 
Designation: Director: Priority Infrastructure Projects

Date: 17/04/2023.

cc:	Mercia Grimbeek	Dalmanutha Wind (RF) Pty Ltd	Email: mercia.grimbeek@enertrag.com
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APPENDIX

C

MEETINGS



APPENDIX

C-1 *DFFE PRE- APPLICATION MEETING*



MEETING NOTES

JOB TITLE	Dalmanutha Wind Energy Facility
PROJECT NUMBER	41103722
DATE	14 June 2022
TIME	09h00
VENUE	MS Teams
SUBJECT	Pre-application Meeting with DFFE
CLIENT	Dalmanutha Wind (PTY) LTD
PRESENT	Ashlea Strong (AS) - WSP Thirushan Nadar (TN)- WSP Muhammad Essop (ME)- DFFE Coenrad Agenbach (CA)-DFFE Trisha Rene Pillay (TP)- DFFE Andrea Gibb (AG)- Enertrag SA Sean Maphosa (SM)- Enertrag SA Sandhisha Jay Narain (SJN)- Enertrag SA
APOLOGIES	Michael Barnes (MB) -Enertrag SA

Building C, Knightsbridge
33 Sloane Street
Bryanston, 2191
South Africa

T: +27 11 361 1300
F: +27 11 361 1301

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MEETING NOTES

MATTERS ARISING

ACTION

NOTE:

These notes constitute a summary of the key discussion points and decisions made during the discussion. They are not intended to reflect the exact discussions held.

1.0 INTRODUCTIONS

Muhammad Essop (ME) opened meeting welcoming everyone and handed over to WSP. Each team proceeded with introductions (WSP, DFFE & ENERTRAG SA)

Ashlea Strong (AS) noted that Michael Barnes gave apologies for not attending.

Approval was obtained to record the meeting for minute purposes.

None

2.0 PRESENTATION

ME requested that all questions should be raised with the “hand” function on MS teams

DFFE handed over to WSP for the presentation of the Dalmanutha wind farm project overview details and specifications.

Thirushan Nadar (TN) began presentation outlining the projects namely:

- Dalmanutha WEF (up to 300MW),
- Dalmanutha WEF grid infrastructure, (up to 132kV)
- Dalmanutha West WEF (less than 20MW)
- Dalmanutha West WEF grid infrastructure (up to 132kV)
- Common collector up to 132kV substation and powerline

The Presentation is included in **Appendix A**.

Location of the project and its respective district and local municipalities were presented.

AS further mentioned, that the project located, along the N4 running through towards Nelspruit on the northern boundary, (near the Bergendal Monument) the facility then runs southwards towards the next closest town, which is Carolina.

Coenrad Agenbach (CA) enquired on why the facility is being separated into WEF (up to 300MW) & West (less than 20MW) due to it sometimes problematic to later split and/or join the licence and authorisations.

Sean Maphosa (SM) replied, Dalmanutha West will possibly be off taken by EXXARO mine to supply power to them, just west from the location. If not it will connect to the main substation on the Dalmanutha facility, thereafter proceed to be Gumeni MTS.

ME noted that it was important to identify if the projects will be part of the IRP and or bidding programs, in order to find out who the Competent authority is for each. Thereafter, agreed to raise it at the end of the meeting.

TN noted that the project does not fall within a REDZ.

TN mentioned the projects will be applied for under a Special Purpose vehicles (SPV) allowing each to have its own EA

Scoping & EIA process

Dalmanutha WEF (up to 300MW),

Basic assessment process

Dalmanutha WEF grid infrastructure, (up to 132kV)

Dalmanutha West WEF (less than 20MW)

Dalmanutha West WEF grid infrastructure (up to 132kV)

Common collector up to 132kV substation and powerline

MEETING NOTES

WULA component also will be required.

ME enquired if CBA and ESA identified on site were from DFFE screening tool, TN confirmed the tool was done and a report was generated giving this result.

ME also asked if there were Bioregional plans, sector plans or CBA plans for Mpumalanga province.

AS replied, yes there is the Mpumalanga Biodiversity Plan which the Mpumalanga Tourism and Parks Agency (MTPA) utilises.

ME noted that there is a need for finding out which particular CBA region the project falls under because the relative requirements will need to be adhered to for developments in those areas. *ME gave example of CBA area 1 requiring biodiversity offset and the need to include offsets thereafter.*

WSP confirmed

AS confirmed that this will be part of scope of work for the Ecology and terrestrial biodiversity studies.

ME mentioned that the specific listed activities triggered will need to be noted.

WSP confirmed

TN confirmed that only High-level Listed activities were outlined in the presentation and that the full scale of triggered activities will be listed later in Scoping and EIA phase.

WSP confirmed

CA enquired on Activity 11 in the project description referring to 3 wind farms, which was probably just a mistake? The error was confirmed, and TN noted that only 2 wind facilities will form part of the applications.

ME enquired if there are separate specialists for the different disciplines and if they are SACNASP accredited, and have all read and understood the protocols

AS confirmed, all of the above.

ME mentioned, Part A of protocols must be read, understood and included in reports of EIA phase, site verification and motivation component as well.

Sandhisha Jay Narain (SJN) enquired if terrestrial biodiversity and aquatic biodiversity study can be done by one specialist or must be two separate specialists.

AS Confirmed

ME answered it should ideally be two different specialists, AS further mentioned for this project will be separate specialists per discipline.

AS confirmed

Andrea Gibb (AG) enquired if fauna and flora should be different specialist as well.

ME outlined that according to regs the relative specialist must be registered in that specific field (i.e. aquatic specialist registered to produce aquatic studies), flora and fauna can be the same report. However, when encountering different threatened species then specific specialists will need to be appointed.

SM confirmed

ME enquired on Geotech study being included for all projects.

AS confirmed that a desktop Geotechnical Study is being included for all projects. Furthermore, AS mentioned, that studies identified by the screening tool for which external specialists were not appointed (i.e. low sensitivities), included the Aviation and Radio Frequency Interference (RFI) studies. In these cases the study/assessment will be done by WSP. WSP will be notifying the relevant stakeholders accordingly including Air Traffic Navigation Services (ATNS), Civil Aviation Authority (CAA), South African Weather Service (SAWS) and relevant telecommunication providers.

WSP to attach to minutes

AS noted, that the bigger facility will be Bid in the REIPPPP and the smaller facility ideally will be off taken by Exxaro mine (if not then will be bought into the REIPPPP Bid). SM agreed.

ME noted that 300MW facility is bidding application, and 20MW facility will be off taken, therefore the **300MW facility together with grid infrastructure, (up to 132kV) and Common Collector**

MEETING NOTES

132kV and substation power line will have the DFFE as the Competent authority (National) and the West 20MW facility together with the grid infrastructure (up to 132kV) will have MDARDLEA (Provincial) as Competent authority.

The Public Participation Plan (PPP) was presented and WSP noted that although not required a PPP will be made available with the minutes.

AG enquired on consolidated PP process despite different competent authorities. AS noted that the PP will be undertaken in a consolidated manner as far as possible so as to reduce the potential for stakeholder fatigue, especially considering the surrounding mining areas.

CA enquired if the language of the Project documents will be made available only in English and Afrikaans and not other languages. Possibility of having an executive summary in relative languages should be considered. AS confirmed that plans were already in place to ensure that adverts, site notices, notification letters and background information documents will be in English, Afrikaans and Zulu.

CA noted that Mining right holders must be considered as well as SANRAL and tourism sectors. Consult with biodiversity unit and protected areas unit and relative officials and protected parks. Visual impact assessment important as well.

AS confirmed all of the above. AS also noted that a Data free website will be used for access to project information

ME hesitant to agree to consolidated PPP. DFFE ok with it if MDARDLEA is on board as well. Furthermore, each project must have its own Stakeholder Engagement Report.

AS enquired if the DFFE would support combined specialist reporting, if they split impact assessment and mitigation for different projects?

CA replied DFFE don't support this. AS noted this response.

CA mentioned generic EMPr for substations etc are required in addition to the normal EMPrs. AS confirmed that these will be included in the EMPrs as required.

If Offsets are required as per mitigation hierarchy, DFFE requires draft Offset plan upfront with draft agreement in place for inclusion in Draft BAR or EIAR- time implications must be considered. Scoping report must have way forward if Offset plan is needed or not. This should be supported by specialists and authorities either agreeing or disagreeing if required.

Minutes to be sent to ME and TP

WSP to confirm with MDARDLEA

WSP noted

TN noted

3.0 CONCLUDING

- No further comments from attendees
- Meeting concluded


MEETING NOTES

APPENDIX A: PRESENTATION

wsp

DFFE Pre-Application Meeting

Dalmanutha Wind Energy Complex




1

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Introductions

Developer	ENERTRAC South Africa (Pty) Ltd Michael Barnes (Senior Project Developer) Sandhisha Jay Narain (Senior Project Developer) Sean Maphosa (Junior Project Developer) Andrea Gibb (Senior Project Developer)
EAP	WSP Group Africa (Pty) Ltd Ashlea Strong (Project Manager) Thirushan Nadar (Consultant)
Authority	Department of Forestry, Fisheries and the Environment (DFFE) Muhammad Essop Trisha Pillay Coenrad Agenbach



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Agenda

- 1 **Overview of the Project**
Background
Location
- 2 **Overview & Confirmation of Permitting Processes**
Listed Activities
Specialist Assessments as identified by DFFE Screening Tool
Specialist Studies commissioned
Specialist Studies not commissioned
Competent Authority
- 3 **Public Participation Process**
- 4 **Timeframes**
- 5 **Discussion**
Clarification
Questions
Way Forward

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Overview of the Project

Background

ENERTRAG SA proposes to establish a renewable energy facility near Belfast Mpumalanga, known as the Dalmanutha Energy Complex, which requires various applications for environmental authorisations.

The proposed complex is divided into 5 subprojects:

- **Dalmanutha Wind Energy Facility (WEF) (up to 300MW)**
- **Dalmanutha Wind Energy Facility Grid infrastructure (up to 132kV)**
- **Dalmanutha West WEF (less than 20MW)**
- **Dalmanutha West Grid infrastructure (up to 132kV)**
- **Common Collection up to 132kV Substation and Powerline**

Each facility will include a Battery Energy Storage System (BESS). The BESS will be used to store excess energy generated by the wind facilities. The BESS will have a storage capacity of up to 100MW/400MWh with up to four hours of storage.

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Overview of the Project

Location

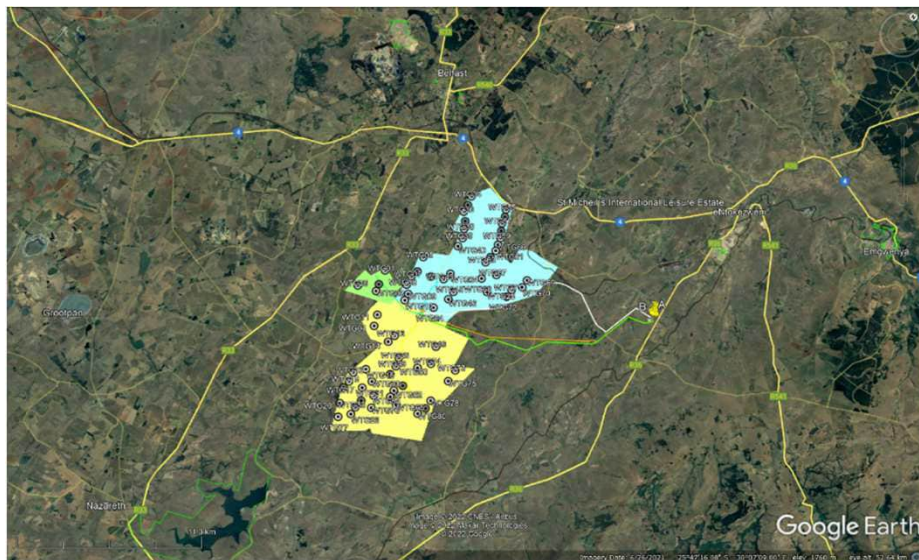
	Dalmanutha WEF & Grid Infrastructure	Dalmanutha West WEF & Grid Infrastructure	Common Grid Infrastructure
Province	Mpumalanga		
District Municipalities	Nkangala & Gert Sibande District Municipalities	Nkangala District Municipality	Nkangala District Municipality
Local Municipalities	Chief Albert Luthuli & Emakhazeni Local Municipalities	Emakhazeni Local Municipality	Emakhazeni Local Municipality
Farms	<ul style="list-style-type: none"> • Portions 1 and 9 of Farm Berg-en-dal 378 • Portions 5 and 7 of Farm Vogelstruispoort 384 • Portions 6, 7, 8, 10, 12 and 13 of Farm Waaikraal 385 • Waaikraal Portion 24 (a portion of Portion 7) • Portion 5 of Vogelstruispoort Farm 384 • Portions 3 and 4 of Farm Leeuwkloof 403 • Portion 1 and Portion 2 of Farm Leeuwkloof 404 • Portion 3 of Farm Geluk 405 • Portion 1 of Farm Welgevonden 412 • Portion 0 of Farm Camelia 467 	<ul style="list-style-type: none"> • Portions 4, 15 and 17 of Vogelstruispoort 384 	<ul style="list-style-type: none"> • Portions 6, 7, 10, 12 of Farm Waaikraal 385 • Portions 4 and 6 of Driekop 387

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Overview of the Project

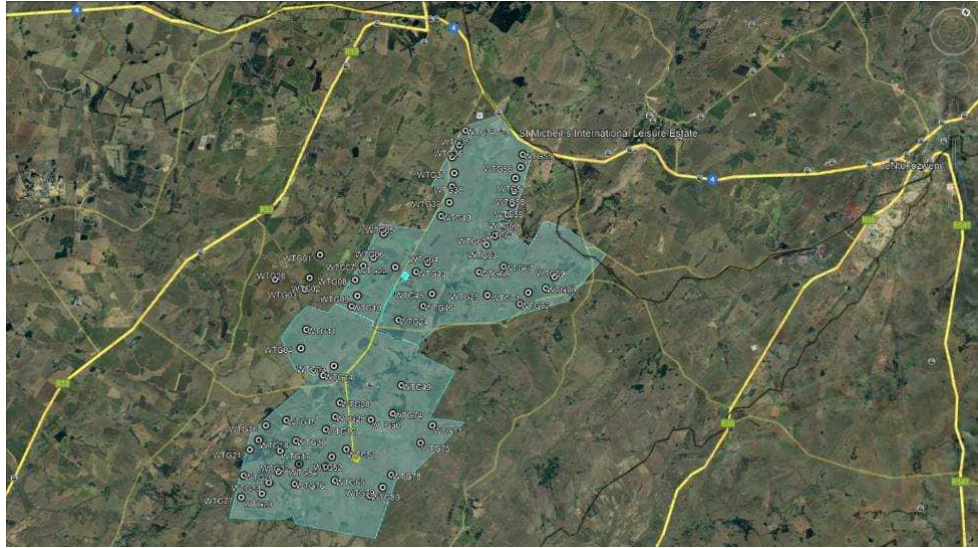


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Dalmanutha Wind Facility



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Dalmanutha West Wind Facility



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**Common Collection up to 132kV
Substation and Powerline**



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Overview of the Project

Typical Infrastructure

Specifications	Dalmanutha WEF	Dalmanutha West
Total Project Area	9 400 ha	580 ha
Buildable Area	Approximately 400 ha	Approximately 15 ha
Wind Turbines	Up to 70	Up to 4
WEF capacity	Up to 300MW	Less than 20MW
Hub Height	Up to 200m	
Rotor Diameter	Up to 200m	
Powerline	Up to 132kV	
Powerline Length	Approximately 15km	
On-site Substation footprint including BESS	Up to 4ha	Up to 2ha
BESS capacity	100MW/400MWh	100MW/400MWh

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Overview of the Project

Typical Infrastructure

Specifications	Dalmanutha Wind Energy Common Grid Infrastructure
Total Project Area	Up to 5ha
Powerline	Single 132 kV double circuit
Powerline Length	Approximately 18km
Eskom substation expansion footprint	Up to 2ha

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Overview of the Project

Key Considerations

- The general project area falls within **Critical Biodiversity Areas (CBA)** and **Ecological Support Areas (ESA)**. The CBA and ESA include both terrestrial and aquatic themes among other themes.
- The project area also falls within **National Protected Area Expansion Strategy (NPAES) Focus Areas**.
- The ecosystem of the project area is considered endangered and vulnerable, and is located within a **Freshwater Ecosystem Priority Area (FEPA)** sub-catchment.
- The Project Area does not fall within any **Strategic Transmission Corridors** or **Renewable Energy Development Zones**.

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Permitting Processes

Environmental Authorisation Process

Each of the below will be applied for under a Special Purpose Vehicle (SPV), allowing each its own Environmental Authorisation

○ Scoping and Environmental Impact Assessment (S&EIA) Processes:

- Dalmanutha WEF (up to 300MW)

○ Basic Assessment Process:

- Dalmanutha West WEF (less than 20MW)
- Dalmanutha West WEF 132 kV grid infrastructure
- Dalmanutha WEF 132 kV grid infrastructure
- Common collector 132kV substation and powerline

○ Water Use Licence

- Water use Licences and/or General Authorisations will be applied for as required

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Permitting Processes

Listed Activities – Listing Notice 1

Listed Activity	Description of Project Activity
<p>Activity 1 The development of facilities or infrastructure for the generation of electricity from a renewable resource where—</p> <p>(i) the electricity output is more than 10 megawatts but less than 20 megawatts; or</p> <p>(ii) the output is 10 megawatts or less but the total extent of the facility covers an area in excess of 1 hectare;</p> <p>excluding where such development of facilities or infrastructure is for photovoltaic installations and occurs—</p> <p>(a) within an urban area; or</p> <p>(b) on existing infrastructure.</p>	<p>The proposed Dalmanutha West WEF will generate less than 20 MW of electricity output from a renewable resource.</p>
<p>Activity 11 The development of facilities or infrastructure for the transmission and distribution of electricity—</p> <p>(i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts; or</p> <p>(ii) inside urban areas or industrial complexes with a capacity of 275 kilovolts or more; excluding the development of bypass infrastructure for the transmission and distribution of electricity where such bypass infrastructure is —</p> <p>(a) temporarily required to allow for maintenance of existing infrastructure;</p> <p>(b) 2 kilometres or shorter in length;</p> <p>(c) within an existing transmission line servitude; and</p> <p>(d) will be removed within 18 months of the commencement of development.</p>	<p>The Dalmanutha Wind Complex (all three wind farms) will connect to the nearby Gumeni MTS through a Common 132kV substation and a 132kV Powerline. The common powerline is approximately 18km in length.</p>

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Permitting Processes

Listed Activities – Listing Notice 1

Listed Activity	Description of Project Activity
<p><u>Activity 27</u> The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for: (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan.</p>	<p>The on-site Substation footprint including BESS facilities will utilise a footprint of up to 6ha for the North and South WEF, and up to 2 ha for the West WEF which will result in the clearance of less than 20 ha of indigenous vegetation.</p>

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Permitting Processes

Listed Activities – Listing Notice 2

Listed Activity	Description of Project Activity
<p><u>Activity 1</u> The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more, excluding where such development of facilities or infrastructure is for photovoltaic installations and occurs: (a) within an urban area; or (b) on existing infrastructure.</p>	<p>The proposed Dalmanutha WEF will generate up to 300 MW of electricity output from a renewable resource.</p>
<p><u>Activity 15</u> The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for— (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan.</p>	<p>The proposed Dalmanutha WEF will result in the clearance of up to 200 ha of indigenous vegetation.</p>

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Permitting Processes

DEA Screening Tool Identified Sensitivities

	Very High Sensitivity	High Sensitivity	Medium Sensitivity	Low Sensitivity
Agriculture Theme	Dalmanutha WEF	Dalmanutha WEF and West WEF 132 kV Grid Connections		
Animal Species Theme		All projects		
Aquatic Biodiversity Theme	All projects			
Archaeological and Cultural Heritage Theme	Dalmanutha WEF 132 kV Grid Connections			Dalmanutha WEF and West WEF 132kV Grid Connections
Avian (Wind) Theme				All WEFs
Bats (Wind) Theme		All WEFs		
Civil Aviation Theme		Dalmanutha WEF 132 kV Grid Connections	Dalmanutha WEF and West WEF & 132kV Grid Connections	
Defence Theme				All projects
Flicker Theme	All WEFs			
Landscape (Wind) Theme	All WEFs			
Palaeontology Theme	All projects			
Noise Theme	All WEFs			
Plant Species Theme			All projects	
RFI (Wind) Theme				All WEFs
Terrestrial Biodiversity Theme	All projects			

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Permitting Processes

DEA Screening Tool Specialist Assessments

Specialist Study	Dalmanutha WEF	West WEF	132KV Grid Connection	Dalmanutha WEF 132kV	132kV West Grid Connection
Agricultural	X	X	X	X	X
Landscape / Visual	X	X	X	X	X
Archaeological and Cultural heritage	X	X	X	X	X
Palaeontological	X	X	X	X	X
Terrestrial Biodiversity	X	X	X	X	X
Aquatic Biodiversity	X	X	X	X	X
Avian Impact	X	X	X	X	X
Civil Aviation	X	X	X	X	X
Defence	X	X			
RFI	X	X	X	X	X
Noise	X	X			
Flicker	X	X			
Traffic	X	X			
Geotechnical	X	X	X	X	X
Socio-Economic	X	X			
Plant Species	X	X	X	X	X
Animal Species	X	X	X	X	X

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Permitting Processes

Specialist Studies Commissioned

SPECIALIST ASSESSMENT	COMMENT
Soils and Agricultural Potential Assessment	A soils and agricultural survey will be undertaken.
Archaeological and Cultural Heritage Impact Assessment	An Archaeological and Heritage Impact Assessment will be undertaken.
Palaeontology Impact Assessment	A Palaeontological Impact Assessment will be undertaken.
Visual Impact Assessment	The projects could potentially negatively impact sensitive visual receptors. A Visual Impact Assessment will therefore be undertaken. The Visual impact Assessment will consider impacts related to flicker.
Terrestrial Biodiversity Impact Assessment	The projects could negatively affect CBA and NPAES Focus Areas. A Terrestrial Biodiversity Assessment will be undertaken. This assessment will include both fauna and flora aspects.
Aquatic Biodiversity Impact Assessment	The projects could negatively affect FEPA areas. An Aquatic Biodiversity Assessment will be undertaken.
Freshwater Impact Assessment	The projects could potentially negatively impact water resources. A Freshwater Impact Assessment will therefore be undertaken.
Avifauna Impact Assessment	Due to the potential impacts on birds as a result of the projects, an Avifauna Assessment will be undertaken.

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Permitting Processes

Specialist Studies Commissioned

SPECIALIST ASSESSMENT	COMMENT
Bat Impact Assessment	Due to the potential impacts on bats as a result of the projects, an Avifauna Assessment will be undertaken. This study will be specific to the WEFS.
Social Impact Assessment	A detailed social assessment will be prepared. The social statement will be based on a desktop review and telephonic interviews with key stakeholders.
Noise Impact Assessment	Due to potential impacts on sensitive receptors with regards to noise generated from the wind turbines, a Noise Assessment will be undertaken.
Geotechnical Assessment	A preliminary Geotechnical Assessment will be undertaken as part of the S&EIA Process.
Traffic Assessment	A traffic assessment will be undertaken
Qualitative Risk Assessment	A hazard and risk identification assessment for the three BESS facilities will be undertaken

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Permitting Processes

Specialist Studies Not-Commissioned

SPECIALIST ASSESSMENT	COMMENT
RFI	A Radio Frequency Interference (RFI) Study will not be undertaken. The South African Weather Service (SAWS) and relevant telecommunications stakeholders will be engaged with as part of the Public Participation Process.
Civil Aviation	The Civil Aviation Authority will be included on the project stakeholder database. They will be informed of the proposed Project, and comment will be sought. An Application for the Approval of Obstacles will also be submitted to SACAA once preferred bidder status is obtained. A compliance statement will be prepared by the EAP and included in the EIA Reports.
Defence	The Department of Defence will be included on the project stakeholder database. They will be informed of the proposed Project, and comment will be sought. A compliance statement will be prepared by the EAP and included in the EIA Reports for the three WEFs.

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Permitting Processes

Competent Authority

- **Section 24C(2)(a) of NEMA**
 - The Minister must be identified as the Competent Authority (CA) if the activity has implications for international environmental commitments or relations
- **GN 779 of 01 July 2016**
 - Identifies the Minister as the CA for the consideration and processing of environmental authorisations and amendments thereto for activities related the Integrated Resource Plan (IRP) 2010 – 2030
- **DFFE is therefore deemed to be the Competent Authority**

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Public Participation Process

Public Participation Plan

- A consolidated approach to the Public Participation (PP) Process for the S&EIA and BA processes respectively
- Site notices:
 - English, Afrikaans and Zulu
 - Onsite and in the surrounding areas
- Compilation and management of I&AP Database
- Written notification:
 - Owners and occupiers on or adjacent to the proposed project site
 - Municipality Ward Councillor
 - District Municipality
 - Relevant State Departments
- Advertisement (English, Afrikaans and Zulu in local newspaper)
- Draft Report Review for 30 days
 - WSP on request
 - Online on the WSP website
 - WSP will confirm with local Public Libraries as to whether they are open and able to accept documents for public review
- Public or focus group meetings will be held as required.

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Timeframes

Timeframes

- Authority Timeframes
 - Does not fall within a Strategic Transmission Corridor (GN 113)
 - Does not fall within a REDZ (GN 114)
 - Authority decision making timeframe is 107 days
- Key Milestones:
 - Submission of Application Forms – August 2022 and January 2023
 - Draft Scoping Report Public Review – August / September 2022
 - Submission of Final Scoping Reports – September 2022
 - Draft EIA and BA Report Public Review – February 2023
 - Submission of Final EIA and BA Reports - March 2023

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Discussion

○ Specific Clarification

- Combined specialist reporting: The propose to combine specialist reporting for linked infrastructure e.g. the WEF and associated grid connection. Specialist will be required to split the impact assessment and mitigation measures accordingly – is this approach acceptable to the DFFE?
- Given the workload – it is anticipated that two or more Case Officers may be allocated to the project?
- Given that ATNS are now the official party responsible for obstacle assessments and effectively subcontract CAA - is ATNS comment on the EIA sufficient for the purposes of informing the protocols as they relate to the CAA?

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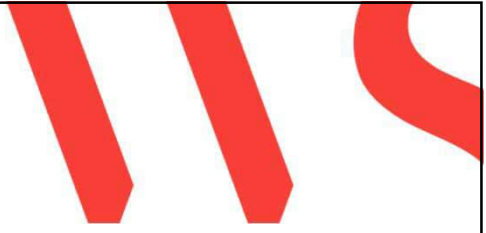


Discussion





- Questions
- Way Forward



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Thank you

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PUBLIC PARTICIPATION PLAN FOR THE ENVIRONMENTAL IMPACT AND BASIC ASSESSMENT PROCESSES FOR THE DALMANUTHA WIND ENERGY COMPLEX

DFFE REF NUMBER: TO BE CONFIRMED ONCE RESPECTIVE APPLICATIONS ARE SUBMITTED

The restrictions enforced in terms of Government Gazette 43096 which placed the country in a national state of disaster limiting the movement of people to curb the spread of the COVID-19 virus have placed some limitations on the commencement and continuation of the public consultation as part of an EIA process. Considering these limitations, the following consultation process has been designed and will be implemented, upon approval by the Department of Forestry, Fisheries and the Environment (DFFE), to cater for the facilitation of the public participation process (PPP). The PPP includes Interested and Affected Parties (I&APs), the competent authority, directly impacted landowners/occupiers, adjacent landowners/occupiers, relevant Organs of State departments, Municipalities, ward councillors and other key stakeholders and all other parties that may have an interest on this project.

The Public Participation Plan (PPP) was a requirement as per the requirements of the General Provisions of Annexure 2 of the Regulations issued in terms of Section 27(2) of the Disaster Management Act, 2002 (Act No.57 of 2002). Which was published on 05 June 2020 in Government Notice No R560 of Government Gazette No 43412. It is noted that these regulations have since been released and as of 01 May 2022, it is no longer a prerequisite to submitting a PPP to the DFFE. However, WSP will still submit this plan to the DFFE to outline the planned public participation activities.

This plan has been developed for the environmental impact and basic assessment processes required for Dalmanutha Wind Energy Complex. The projects associated with this facility include:

- Environmental Impact Assessment for the Dalmanutha Wind Energy Facility (Up to 300MW)
- Basic Assessment for the Dalmanutha West Wind Energy Facility (less than 20 MW)
- Basic Assessment for the Dalmanutha Wind Energy Facility Grid Infrastructure (up to 132kV)
- Basic Assessment for the Dalmanutha West Wind Energy Facility Grid Infrastructure (up to 132kV)

According to Section (2)(4)(f) of the National Environmental Management Act (NEMA), the participation of all I&APs must be promoted and all potential I&APs must be informed early and in an informative and proactive way regarding applications that may affect their lives or livelihood in order to give effect to the above sections, and that it is essential to ensure that there is an adequate and appropriate opportunity for public participation in decisions that may affect the environment.

A consolidated I&AP database will be compiled for these processes. The I&APs will be provided with the opportunity to review and make comments on all relevant documentation associated with the above-mentioned applications.

Table 1 provides the competent authority with a detailed outline of the public participation process that will be undertaken for the projects. **Table 2** provides the competent authority with an outline of the meetings

The requirements of the Protection of Personal Information Act, 2013 (Act No. 14 of 2013) (POPIA) relating to registers of I&APs and the inclusion of comments in reports will be taken into consideration.

Building C, Knightsbridge
33 Sloane Street
Bryanston, 2191
South Africa

T: +27 11 361 1380
F: +086 606 7121
wsp.com



Table 1: Proposed Public Participation Plan

SUMMARY OF PPP REQUIREMENT (GNR 326 OF EIA REGULATIONS)	PROPOSED PLAN/ACTIVITIES
<p>39 (1) If the proponent is not the owner or person in control of the land on which the activity is to be undertaken, the proponent must, before applying for an environmental authorisation in respect of such activity, obtain the written consent of the landowner or person in control of the land to undertake such activity on that land.</p>	<ul style="list-style-type: none"> — Landowner consent letters will be obtained for each of the farm portions where the proposed activities will be undertaken. Consent letters will be included in the Application forms for Environmental Authorisation.
<p>39 (2) Sub regulation (1) does not apply in respect of—</p> <p>(a) linear activities;</p> <p>(b) activities constituting, or activities directly related to prospecting or exploration of a mineral and petroleum resource or extraction and primary processing of a mineral or petroleum resource; and</p> <p>(c) strategic integrated projects as contemplated in the Infrastructure Development Act, 2014.</p>	<ul style="list-style-type: none"> — Landowner Consent Letters are not required for linear activities. — Notification letters of the Environmental Assessment Processes undertaken for the linear projects will be distributed via email and/or hand delivery (as required) to the directly impacted landowners or occupiers of the land.
<p>40 (1) The public participation process to which the—</p> <p>(a) basic assessment report and EMPr, and where applicable the closure plan, submitted in terms of regulation 19; and</p> <p>(b) scoping report submitted in terms of regulation 21 and the environmental impact assessment report and EMPr submitted in terms of regulation 23;</p> <p>was subjected to must give all potential or registered interested and affected parties, including the competent authority, a period of at least 30 days to submit comments on each of the basic assessment report, EMPr, scoping report and environmental impact assessment report, and where applicable the closure plan, as well as the report contemplated in regulation 32, if such reports or plans are submitted at different times.</p>	<ul style="list-style-type: none"> — Notification of the availability of the Scoping and Environmental Impact (S&EIA) and Basic Assessment (BA) Reports as relevant for the relevant Dalmanutha Wind Energy Facility projects, as well as the period for review will be sent to all identified and registered stakeholders via email and SMS. — The Draft Reports will be made available to all stakeholders for a 30-day comment period as follows: — From WSP on request and electronic copies can be shared via secure links that will be emailed. — On the WSP website as well as on a data-free website¹ for download. — Hard copies of the Reports will be placed at the relevant public places such as libraries, community halls, ward councillor offices etc. — Flash drives and/or Hard Copies submitted to the relevant Organs of State. — Submitted to the DFFE via the DFFE online portal. —
<p>40 (2) The public participation process contemplated in this regulation must provide access to all information that reasonably has or may have the potential to influence any decision with regard to an application unless access to that information is</p>	<ul style="list-style-type: none"> — Provision has been made to ensure all project information will be made available to all I&APs, and that they are afforded the opportunity to participate in the projects, as well as submit comments and raise any concerns and/or issues with regards to the proposed projects. This will include:

¹ A data free website is a website that the public can access and download information without using their own data or incurring costs



SUMMARY OF PPP REQUIREMENT (GNR 326 OF EIA REGULATIONS)

PROPOSED PLAN/ACTIVITIES

<p>protected by law and must include consultation with—</p> <p>(a) the competent authority.</p> <p>(b) every State department administers a law relating to a matter affecting the environment relevant to an application for an environmental authorisation.</p> <p>(c) all organs of the state which have jurisdiction in respect of the activity to which the application relates; and</p> <p>(d) all potential, or, where relevant, registered interested and affected parties.</p>	<ul style="list-style-type: none"> — Identification of stakeholders with a potential interest in the project will be at the outset of the project. — All stakeholders identified will be registered on the project stakeholder database, and the database will be maintained throughout the S&EIA and BA processes. — The stakeholder database will include all relevant authorities (government departments and relevant district and local municipalities), ward councillors, relevant conservation bodies and non-governmental organisations (NGO's), as well as neighbouring landowners and the surrounding community. — General communication (written notification) with identified stakeholders (public and other government departments/authorities) on the proposed projects. — Distribution of the Background Information Document (BID), inclusive of a Registration and Comments Form, to allow stakeholders to register and ensure all comments and queries regarding the projects are captured for inclusion in the relevant Stakeholder Engagement Reports. — Consultation of relevant communities via the Ward Councillor and/or community representative, in a manner determined and/or required during stakeholder engagement.
<p>40 (3) Potential or registered interested and affected parties, including the competent authority, may be provided with an opportunity to comment on reports and plans contemplated in sub-regulation (1) prior to submission of an application but must be provided with an opportunity to comment on such reports once an application has been submitted to the competent authority.</p>	<ul style="list-style-type: none"> — Reports will be made available to all potential or registered I&APS following the submission of the applications to the DFFE, that is during the legislated relevant report review periods. — Reports will be available on request, on the WSP website, and in hard copy at appropriate public places in the study area such as public libraries and municipal officers. — All I&APs will be provided with an opportunity to comment on the reports and submit comments directly to the EAP. Comments can be submitted in the following ways: <ul style="list-style-type: none"> — Comments Forms via fax or email — Written comments via email or fax — Telephonically for capturing by the EAP; and — Via Whatsapp or SMS (including the use of “please call me”).
<p>41(2) The person conducting a PPP must give notice to all potential I&APs by-</p> <p>(a) fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of—</p> <p>(i) the site where the activity to which the application or proposed application relates is or is to be undertaken; and</p> <p>(ii) any alternative site;</p>	<ul style="list-style-type: none"> — Placement of site notices (in English, Afrikaans and IsiZulu) at appropriate locations on-site (at the wind facilities and at various points along the grid infrastructure routes) and in the surrounding area. — This will include the boundary/access road to the sites, as well as additional public places within the greater Belfast area, such as grocery stores, municipality, and/or local public libraries.
<p>(b) giving written notice, in any of the manners provided for in section 47D of the Act, to—</p> <p>(i) the occupiers of the site and, if the proponent or applicant is not the owner or person in control of the site on which the activity is to be undertaken, the owner or person in control of the site where the activity is or is to be undertaken and to any</p>	<ul style="list-style-type: none"> — A written notification (in English, Afrikaans, and Isizulu) will be sent to owners and occupiers on or adjacent to the proposed project sites, municipality ward councillors, local and district municipality, and relevant state departments. — General communication (written notification) with stakeholders (public and government departments/authorities) throughout the respective environmental impact assessment (EIA) and basic assessment (BA) processes.

SUMMARY OF PPP REQUIREMENT (GNR 326 OF EIA REGULATIONS)

PROPOSED PLAN/ACTIVITIES

<p>alternative site where the activity is to be undertaken;</p> <p>(ii) owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken and to any alternative site where the activity is to be undertaken;</p> <p>(iii) the municipal councillor of the ward in which the site and alternative site is situated and any organisation of ratepayers that represent the community in the area;</p> <p>(iv) the municipality which has jurisdiction in the area;</p> <p>(v) any organ of state having jurisdiction in respect of any aspect of the activity; and</p> <p>(vi) any other party as required by the competent authority;</p>	<p>— Stakeholders will be added to the database on request as the project progresses.</p>
<p>(c) placing an advertisement in—</p> <p>(i) one local newspaper; or</p> <p>(ii) any official Gazette that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations;</p>	<p>An advert will be published in relevant local newspapers (in English, Afrikaans and IsiZulu), formally announcing the commencement of the Environmental Authorisation (EA) applications, requesting stakeholders to register their interest in the project, and informing them of the release of the Draft Scoping, EIA and BA Reports for public review and comment. The adverts and notifications will be inclusive of the Heritage Impact Assessment and Water Use Licence Application information.</p>
<p>(d) placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond the boundaries of the metropolitan or district municipality in which it is or will be undertaken</p>	<p>It has been established that advertising in provincial and national newspapers is not required as the impact of the activities do not extend beyond the boundaries of the district municipality or province in which the Project will be undertaken.</p>
<p>(e) using reasonable alternative methods, as agreed to by the competent authority, in those instances where a person is desirous of but unable to participate in the process due to—</p> <p>(i) illiteracy;</p> <p>(ii) disability; or</p> <p>(iii) any other disadvantage.</p>	<ul style="list-style-type: none"> — A consolidated I&AP database will be compiled for the project. Any existing I&AP databases for other projects in the area known to the applicant will be utilised as a basis for the database. These I&APs will be contacted to request formal consent to be included in the projects' database, in line with the POPI Act. As part of the verification process, existing I&APs will be contacted telephonically and asked to confirm their preferred method of communication. — The relevant ward councillors will be contacted to ensure that community-based organisations are aware of the Project and can assist in distributing and communicating relevant Project information to community members. — Virtual focus group meetings will be held as required. — In the event that face-to-face meetings are requested, these will be arranged on a case-by-case basis, taking into account the relevant COVID restrictions at the time of the request. — I&APs will be able to contact the EAP via email, fax, telephone, WhatsApp, or SMS (Including the use of “please call me”).
<p>41 (3) A notice, notice board or advertisement referred to in sub regulation (2) must—</p>	<p>— An advert will be published in relevant local newspapers (in English, Afrikaans and IsiZulu), formally announcing the commencement of the</p>

SUMMARY OF PPP REQUIREMENT (GNR 326 OF EIA REGULATIONS)

PROPOSED PLAN/ACTIVITIES

<p>(a) give details of the application or proposed application which is subjected to public participation; and</p> <p>(b) state—</p> <p>(i) whether basic assessment or S&EIR procedures are being applied to the application;</p> <p>(ii) the nature and location of the activity to which the application relates;</p> <p>(iii) where further information on the application or proposed application can be obtained; and</p> <p>(iv) the manner in which and the person to whom representations in respect of the application or proposed application may be made.</p>	<p>Environmental Authorisation (EA) applications, requesting stakeholders to register their interest in the project, and informing them of the release of the Draft Scoping, EIA and BA Reports for public review and comment.</p> <p>— Site notices (in English, Afrikaans and IsiZulu) will be placed at appropriate locations on site) and in the surrounding area. The size and content of the site notices will be in line with Regulation 41 (3) and 41(4) as contained herein.</p>
<p>41 (4) A notice board referred to in sub regulation (2) must—</p> <p>(a) be of a size of at least 60cm by 42cm; and</p> <p>(b) display the required information in lettering and in a format as may be determined by the competent authority.</p>	<p>— If the revised reports are required to undergo additional review, the requirements of Regulation 41(5) will be followed.</p>
<p>41 (5) Where public participation is conducted in terms of this regulation for an application or proposed application, sub regulation (2)(a), (b), (c) and (d) need not be complied with again during the additional public participation process contemplated in regulations 19(1)(b) or 23(1)(b) or the public participation process contemplated in regulation 21(2)(d), on condition that—</p> <p>(a) such process has been preceded by a public participation process which included compliance with sub regulation (2)(a), (b), (c) and (d); and</p> <p>(b) written notice is given to registered interested and affected parties regarding where the—</p> <p>(i) revised basic assessment report or, EMPr or closure plan, as contemplated in regulation 19(1)(b);</p> <p>(ii) revised environmental impact assessment report or EMPr as contemplated in regulation 23(1)(b); or</p> <p>(iii) environmental impact assessment report and EMPr as contemplated in regulation 21(2)(d);</p>	



SUMMARY OF PPP REQUIREMENT (GNR 326 OF EIA REGULATIONS)

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<p>may be obtained, the manner in which and the person to whom representations on these reports or plans may be made and the date on which such representations are due.</p>	
<p>41 (6) When complying with this regulation, the person conducting the public participation process must ensure that—</p> <p>(a) information containing all relevant facts in respect of the application or proposed application is made available to potential interested and affected parties; and</p> <p>(b) participation by potential or registered interested and affected parties is facilitated in such a manner that all potential or registered interested and affected parties are provided with a reasonable opportunity to comment on the application or proposed application.</p>	<ul style="list-style-type: none"> — Provision has been made to ensure all project information will be made available to all I&APs, and that they are afforded the opportunity to participate in the projects, as well as submit comments and raise any concerns and/or issues with regards to the proposed projects. — A Notification Letter and BID will be compiled to provide preliminary information regarding the project and its location, as well as to invite comments from I&APs during the 30-day public review period of the Draft Reports. — All registered I&APs will be included in any communication regarding the application processes for the projects throughout the respective S&EIA and BA processes.
<p>41 (7) Where an environmental authorisation is required in terms of these Regulations and an authorisation, permit or licence is required in terms of a specific environmental management Act, the public participation process contemplated in this Chapter may be combined with any public participation processes prescribed in terms of a specific environmental management Act, on condition that all relevant authorities agree to such combination of processes.</p>	<ul style="list-style-type: none"> — Applications for the proposed projects will also be made under the National Water Act (NWA), through a Water Use Licence Application (WULA) or General Authorisation (GA) processes as applicable for the purposes of Water Use Authorisation under the National Water Act. A Public Participation Process (PPP) in terms of the EIA Regulations (contained herein) and the NWA will be undertaken as well as a Heritage Impact Assessment.
<p>(42) A proponent or applicant must ensure the opening and maintenance of a register of interested and affected parties and submit such a register to the competent authority, which register must contain the names, contact details and addresses of—</p> <p>(a) all persons who, as a consequence of the public participation process conducted in respect of that application, have submitted written comments or attended meetings with the proponent, applicant or EAP;</p> <p>(b) all persons who have requested the proponent or applicant, in writing, for their names to be placed on the register; and</p> <p>(c) all organs of state which have jurisdiction in respect of the activity to which the application relates.</p>	<ul style="list-style-type: none"> — Stakeholders with a potential interest in the Project will be identified at the outset of the Project and will include all relevant authorities (government departments and the local and district municipalities), relevant conservation bodies and non-governmental organisations (NGO's), as well as landowners, neighbouring landowners, and the surrounding community. — This stakeholder database will be updated on an ongoing basis as new stakeholders request to be registered. — All stakeholders identified will be registered on the project stakeholder database, and the database will be maintained throughout the EIA and BA processes. — The EAP will continue to ensure that individuals/organisations from referrals and networking are notified of the proposed project.
<p>(43) (1) A registered interested and affected party is entitled to comment, in writing, on all reports or</p>	<p>All Draft Reports will be made available to all stakeholders for a 30-day comment period. Strict adherence to all COVID-19 protocols and regulations</p>

SUMMARY OF PPP REQUIREMENT (GNR 326 OF EIA REGULATIONS)

PROPOSED PLAN/ACTIVITIES

<p>plans submitted to such party during the public participation process contemplated in these Regulations and to bring to the attention of the proponent or applicant any issues which that party believes may be of significance to the consideration of the application, provided that the interested and affected party discloses any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application.</p> <p>(2) In order to give effect to section 24O of the Act, any State department that administers a law relating to a matter affecting the environment must be requested, subject to regulation 7(2), to comment within 30 days.</p>	<p>as well as best practice measures will be ensured throughout PPP. As a result, the Draft Reports will be made available to stakeholders as follows:</p> <ul style="list-style-type: none"> – From WSP on request and electronic copies can be shared via secure links that will be emailed. – On the WSP website and on a data-free website for download. – Hard copies of the Reports will be placed at the relevant public places such as libraries, community halls, ward councillor offices – CDs and/or Hard Copies submitted to the relevant Organs of State. – Submitted to the DFFE via the DFFE online portal. <p>Comment forms (in a bound booklet) will be placed with the Draft Reports at the abovementioned public places. These booklets will be collected at the end of the public review period as required. In addition, the contact details of EAP will be provided should the I&AP wish to contact the EAP directly.</p> <p>A Comment and Response Report (CRR) will be generated for inclusion in Final Reports for consideration by the competent authority.</p>
<p>44(1) The applicant must ensure that the comments of interested and affected parties are recorded in reports and plans and that such written comments, including responses to such comments and records of meetings, are attached to the reports and plans that are submitted to the competent authority in terms of these Regulations.</p> <p>(2) Where a person desires but is unable to access written comments as contemplated in sub regulation (1) due to—</p> <p>(a) a lack of skills to read or write;</p> <p>(b) disability; or</p> <p>(c) any other disadvantage;</p> <p>reasonable alternative methods of recording comments must be provided for.</p>	<ul style="list-style-type: none"> – All I&APs will be able to submit comments directly to the EAP in the following ways: – Comments Forms via fax or email – Written comments via email or fax – Telephonically for capturing by the EAP; and – Via WhatsApp or SMS. <p>Comments received telephonically will be transcribed and captured as formal comments in the Comments and Responses Report.</p> <p>I&APs that do not have access to the internet or emails will also be able to submit via the consultation process that includes engaging with the Ward Councillor and/or Community Representative.</p>
<p>Regulation 44 (2) The applicant must, in writing, within 14 days of the date of the decision on the application ensure that—</p> <p>(a) all registered interested and affected parties are provided with access to the decision and the reasons for such decision; and</p> <p>(b) the attention of all registered interested and affected parties is drawn to the fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, if such appeal is available in the circumstances of the decision.</p>	<p>Written notification of the decision on the EAs will be sent to all registered I&APs, as well as communicated via Ward Councillors to I&APs that do not have access to internet and emails. Registered I&APs will be informed of the appeal procedure as well as advised that copies of the EA decisions can be provided on request.</p>



Table 2: Meetings

PROJECT MEETINGS

Pre-Application Meeting	A pre-application consultation with DFFE was held on 14 June 2022 to discuss the proposed projects, proposed approach, and confirm the processes.
Public and/or Focus Group Meetings	<ul style="list-style-type: none">— Virtual focus group meetings will be held as required.— In the event that face-to-face meetings are requested, these will be arranged on a case-by-case basis, taking into account the relevant COVID restrictions at the time of the request.

APPENDIX

C-2 *FOCUS GROUP MEETING WITH BIRDLIFE, MTPA AND MDARDLEA*



MEETING NOTES

JOB TITLE	Dalmanutha Wind Energy Facility
PROJECT NUMBER	41103722
DATE	22 February 2023
TIME	09h45
VENUE	MS Teams
SUBJECT	Avifaunal & Biodiversity Discussion with Mpumalanga Tourism and Parks Agency (MTPA), Bird Life South Africa (BLSA) & Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (MDARDLEA)
CLIENT	Dalmanutha Wind (RF) (PTY) LTD
PRESENT	Ashlea Strong (AS) - WSP Thirushan Nadar (TN) - WSP Brad Graves (BG) - WSP, Biodiversity Specialist Mmakoeana Mmola- (MM) - Enertrag South Africa (ESA) Andrea Gibb (AG) - ESA Frans Krige- (FK) - MTPA Mervyn Lotter- (ML) - MTPA Robyn Luyt (RL) - MDARDLEA Sam Ralston (SR) - BLSA Jon Smallie (JS) - Avifaunal Specialist
APOLOGIES	Dr. Kyle Lloyd (KL)- BLSA Aisling Dower (AD)- WSP, Biodiversity Specialist

BUILDING 1, GOLDER HOUSE
MAXWELL OFFICE PARK
MAGWA CRESCENT WEST
WATERFALL CITY, MIDRAND
SOUTH AFRICA

T: +27 11 361 1300
F: +27 11 361 1301

www.wsp.com \corp.pbwan.net\za\Central_Data\Projects\41100xx\41103722 - Dalmanutha WEF\41 ES\04-Public Participation\05-Public Meetings\22-02-2023_Avi&Biodiv Discussion\41103722_Dalmanutha_Key Stakeholder Meeting_Meeting Notes_20230222_FINAL.docx

MEETING NOTES

MATTERS ARISING

ACTION

<p>Note:</p> <p>These notes constitute a summary of the key discussion points and decisions made during the discussion. They are not intended to reflect the exact discussions held.</p> <p>Google Earth Images are included in Appendix A</p>	
<p>1.0 INTRODUCTIONS</p> <p>AS handed over to attendees to introduce themselves.</p> <p>RL noted that she will have to leave early due to another meeting with the Department of Forestry, Fisheries and the Environment (DFFE).</p>	None
<p>2.0 DISCUSSION</p> <p>AS acknowledged all comments and noted WSP responded to all as best possible at this stage for the Final Scoping Report (FSR).</p> <p>AS noted that going forward into the Environmental Impact Assessment (EIA) phase, all input from all stakeholders is valued.</p> <p>AS presented the initial 77 turbine layout, which was the original layout, which thereafter was revised to 70 turbines, taking into consideration the comments and concerns.</p> <p>JS mentioned that the 77 turbine layout presented constraints and ESA was willing to drop turbines in order to optimise the layout to produce the 70 turbine layout.</p> <p>JS mentioned that he drew up a risk assessment to rank the turbines individually according to their collision risk to birds.</p> <p>JS noted that 14 Red listed and priority bird species were rated according to their relative importance on the site and the probability of impact. These two factors were thereafter combined to give each species a collision risk score. JS then went through the turbines individually and scored the turbines according to what their risk would be for that species.</p> <p>JS noted that turbines were rated from 1 to 5, with 1 being highest risk to avifauna. All turbines rated 1 were subsequently dropped from the layout.</p> <p>JS noted that the ranking matrix was further revised following submission of the FSR. The revised scoring had 6 scoring categories from zero to five, with zero being the highest. JS gave all those turbines that present the highest collision risk to birds a ranking of 0. All the turbines close to the Cape Vulture roosts received an additional high score of 0.</p> <p>ML asked if the colour red on the ranking scale is low or high risk and asked JS to run through the ranking colours.</p> <p>JS confirmed that the red is high, and orange is the next category down. Then what's appearing pink up in the North is the next category and yellow is the next, and then green is the lowest risk category.</p> <p>AS further clarified that all red coloured turbines present the highest collision risk.</p> <p>ML asked JS what distance band was used to determine the collision risk of each turbine.</p> <p>JS replied that the risk ranking drew on different kinds of data. There's no single answer on what proximity was considered to determine the collision risk. JS further stated that they have point type data, polygon type data and flight path data which was recorded up to 2km from vantage points.</p> <p>JS also noted incidental records, i.e., priority birds that were seen as they were travelling around the site. So they are point locations.</p>	

MEETING NOTES

Lastly, JS mentioned that driven transects were also used to collect data. Drive transects entail driving a set route and recording the birds and point locations and then walk transects you also get point locations and then focal sites which are essentially sensitive receptors. Something like the bald Ibis Roost is a point location that holds sensitivity.

ML mentioned that they want to go through the thinking and the decisions made when identifying or establishing the collision risk matrix.

ML noted that there's so much uncertainty that it is difficult to put the distance band. It is difficult because there isn't sufficient information.

FK mentioned that there are uncertainties, and one has to cover a longer period of study to address these.

FK mentioned that the prevailing wind direction is normally northwest and quite strong northwest, and that the turbines would be a serious barrier for most high-flying birds when they start to migrate in the northwest down to the south.

FK noted his concern on the time period of the studies done.

JS replied that at the time of response to comments on the Draft Scoping Report (DSR), only a year of monitoring had been completed., The EIA Report will present data collected from two years of monitoring.

FK further enquired if these two years will be sufficient.

JS confirmed it will be.

FK noted that monitoring should be done over a longer period.

JS noted that all monitoring efforts are compliant with the best practice guidelines currently published. Should the results following completion of the second year of monitoring indicate the need for an extension of the monitoring period, then that would be considered. However, all monitoring efforts to date are compliant with the guidelines.

FK asked that if those turbines highlighted in red are of high risk, what mitigation is planned for them.

JS replied that the intention is to remove the high-risk turbines and not to mitigate the impacts associated with them.

AG confirmed that this is the intention of ESA.

SR further mentioned that the best practice guidelines recommend one year of monitoring at a minimum, which should be increase to two years on high-risk sites.

SR raised concern if the right kind of data is being gathered to answer the important questions.

SR noted that before we start looking at where turbines should or should not be located, we should be asking if this is the right site for a wind farm to start with.

SR asked JS to elaborate on the sensitivity of the site, the potential impacts on white winged flufftail and the presence of a flyway located on the site.

AS mentioned that there is a wind facility already authorised in the area called the Harverfontein WEF, to the south of the proposed Dalmanutha WEF. Application was received in 2017 and subsequently approved.

JS replied to SR agreeing it is indeed a highly sensitive site as further monitoring has confirmed, but alternatives sites are difficult as the site was selected by ESA. However, the goal is to find the middle ground.

MEETING NOTES

JS noted that upon breaking down the sensitivities and taking species by species, there are some good mitigation options and some good avoidance options. Furthermore, ESA have already shown a lot of willingness to try and avoid risk.

JS further noted based on the number of days spent out on the site recording data on birds and flight, it can be stated with high confidence that there was no record of a migration type behaviour by species or a migration type event. JS stated that based on the above, he would be extremely hesitant to call the site a flyway.

JS noted that he enquired with BLSA on existing data and information which could assist with this flyway question. Data gathered to date does not show the site to be a flyway.

JS further noted that regarding the white winged flufftail, he was under the impression that the locations of the species are well known, and this site is not one of them.

JS however noted that he cannot confirm if the white winged flufftail is on site or not as trail cameras and acoustic recorders would be required to detect this species.

JS asked BLSA to elaborate on why they feel the species could occur on site. JS stated that comments were received from a neighbouring farmer who says that the bird could occur on their farm, but no evidence has been presented to date and the family has been on the farm for many years.

SR replied that the flufftail occurrence is based on a habitat suitability model developed by BLSA. SR further mentioned that this is a critically endangered species. Very little is known about it. It's population is probably less than 250.

SR further mentioned that JS should contact Ernst Retief from BLSA to get the habitat suitability models so he could get a decent idea of where they are and chat about how those maps were developed. SR further stated that there are two choices: One - we can assume that those models are correct and that the species occur on site ;or Two - we need to go out and verify that they are not there as this is probably the biggest potential red flag.

SR noted that if the species is found in the broader landscape, BLSA would not want to see turbines here.

AS asked how much of this information can be public knowledge.

SR noted that the habitat suitability model outputs are already on the site sensitivity tool. Furthermore, you can include sensitive information without including the maps. The maps could be submitted to the department and not put out in the public for comment.

JS noted that he will get the habitat suitability models from BLSA

JS asked SR to elaborate on their comment about additional studies not changing BLSA's opinion on the proposed project.

SR replied that there is already a lot of information on the occurrence of many sensitive species on site; furthermore, all indications are that the site is far from ideal for wind farm development and what they don't like to see is a situation where a developer conducts further studies on a site, and no better answers are achieved. They may only get clarity on the cost of mitigation and be able to have a better definition of high risk. The risk is still likely to be significant.

ML stated that even if one or two turbines are removed, MTPA's concerns will not change, because at a macro level, this area is utilized by a number of very threatened bird species and there is a high likelihood of collision.

ML further noted that they reviewed and commented on 17 applications in the province of which this is the first fatally flawed one; furthermore, the new information presented may not change the view of MTPA.

AS asked SR which section of the site has the biggest risk

MEETING NOTES

SR replied that without further information, they cannot comment on this.

FK concurred with ML and SR, and further stated that the siting of a wind farm is important, and that the fact that early warning concerns and red flags raised during this phase should show that the development is not desirable in the area.

MM mentioned that this site was chosen because of its wind resource and grid capacity and proximity to the grid connection. The sites' elevation is high and has the best wind speeds in the Belfast area.. Therefore if the site were to be moved (further east or west) to a different location, the project will most probably no longer be economical.

MM went on to further outline that Mpumalanga is better suited and is currently being targeted for renewable energy development than Northern Cape and Western Cape as there are no constraints in terms of grid capacity and connection in Mpumalanga.

AS further mentioned, that many sites in the Northern Cape are authorised but have no grid capacity.

AS mentioned that the EIA should be completed in order to further understand the layout and project, and that this project is really utilising the mitigation hierarchy.

FK enquired about the DFFE designated energy corridors/areas where these projects should be developed, and why they aren't located there. Furthermore, the coal industry is putting heavy strain on biodiversity in the area and now additionally, the renewable energy projects are also contributing to this. A portion of the site overlaps with the Steenkampsberg Important Bird Area, which is one of the most sensitive areas, and therefore one of the reasons the MTPA opposes the development.

AS replied that there is just one REDZ (renewable energy development zone) in Mpumalanga, and that the opportunity to revise and re-look at issues is not possible. The opportunity to receive important comments in scoping phase is not available.

AS further noted that renewable energy projects don't have to be developed in the REDZ, although this project is close by. It is worthwhile having the extra time and receiving the additional comments when the project is not subjected to the shorter time frames that projects located in a REDZ are subjected to.

FK asked why there is no Green hydrogen and ammonia plant option on this project

AG replied that the combination of wind and solar will be required for the Green hydrogen and ammonia plant, to produce as much as possible, and also a large amount of water supply will be needed.

MM further added that upon engaging with Emakhazeni Local Municipality, they were informed that there are currently severe water shortages in the Belfast area.

AS noted that there is a possibility of having a solar component added to the project in order to supplement the megawatt capacity and allow some of the high risk turbines to be removed. i.e., a hybrid facility.

AS mentioned that solar patches of about 20MW would be required, resulting in about 45ha each; however, this is still a very early concept and feasibility is still uncertain, but will be further investigated in the EIA phase.

AS noted that solar will however use more land and possibly infringe on Critical Biodiversity Areas (CBA).

FK agreed that this hybrid option would be welcomed, and that there are flat agricultural lands which could be utilised, avoiding wetlands.

ML noted that the project is still fatally flawed as it stands; however, a hybrid facility could potentially lower the number turbines, and subsequently increase the likelihood of approval but still doesn't at all guarantee any approval from MTPA. It just means it is more favourable because the number of turbines will be lower.

MEETING NOTES

ML stated that in 2002 a project (Biobase) was undertaken which aimed to determine the conservation value of land in Mpumalanga. The project modelled the distribution of various taxonomic groups which were all added together at the end. All the birds were modelled as well as all the plants. We modelled all the mammals, etcetera, and the area where the site is proposed was noted a very important area for the birds escarpment from Steenkampsberg down to Wakkerstroom.

ML further noted that tracking data will be needed to show how the birds move in order to confirm flyways in the area.

ML mentioned that this project has highlighted the need for MPTA trying to model a flyway for the Mpumalanga province as a whole so MPTA would have this information in future when there's other applications to comment on.

ML noted that the proposed project has a better chance of being approved, and that MPTA can't still say it is fatally flawed.

SR noted that impacts associated with solar projects are more predictable than wind and would encourage ESA to look into it.

AS mentioned that WSP has recommend to the DFFE that the project be carried over into EIA phase.

AS mentioned that MPTA, MDARDLEA and BLSA will be further engaged with when the layouts and alternative technology options have been considered.

SR mentioned that its important to look at South Africa's international commitments to protect migratory bird species.

3.0 MS TEAMS COMMENTS

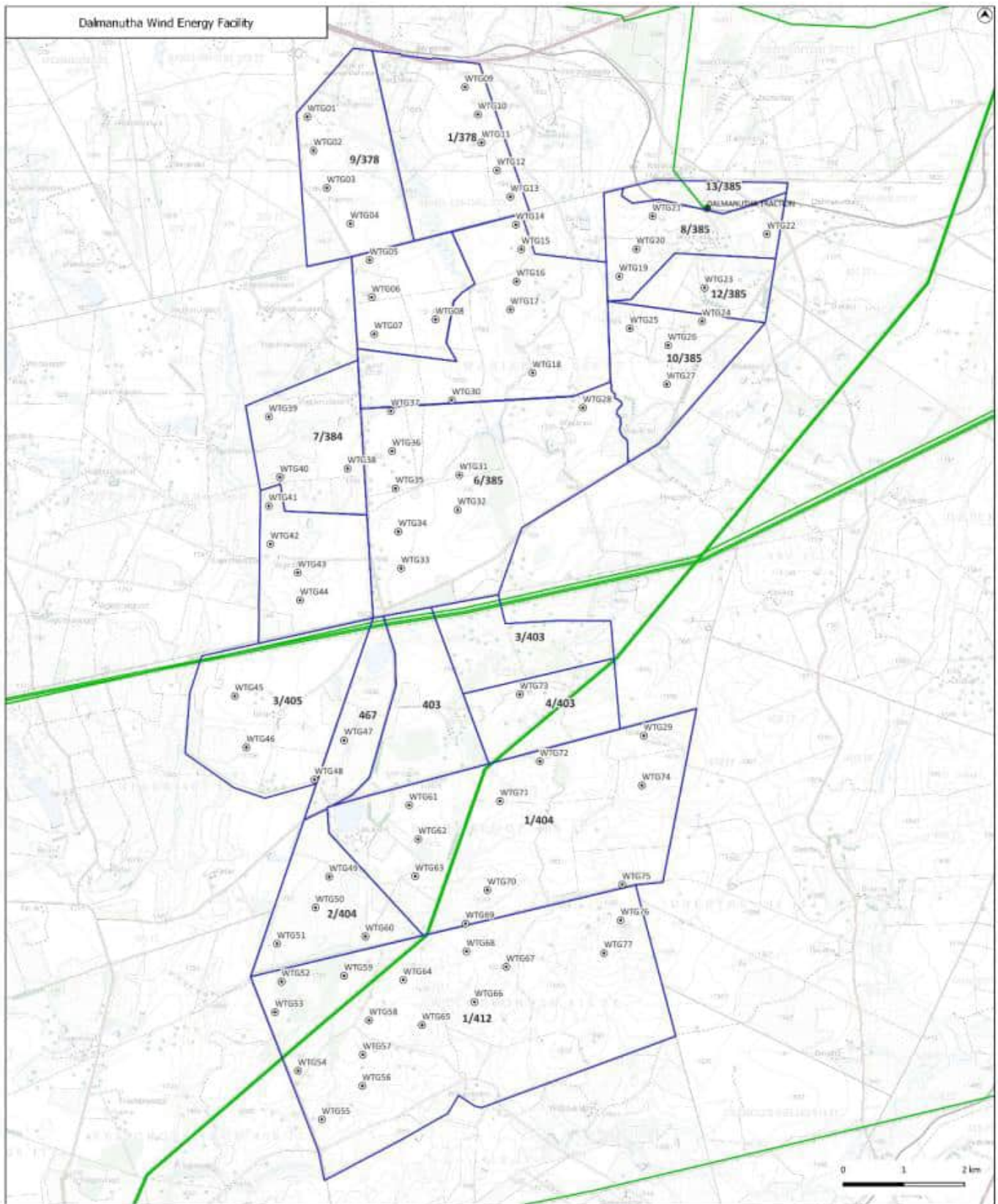
- [02/22 10:30] Mervyn Lotter (Guest)
 - Jon, how many days have you spent monitoring of birds on site? I would like an estimate of number of days per year?
- [02/22 10:54] Sam Ralston
 - I can't recall if I referenced this in our comments, but please not the The Agreement on the Conservation of African-Eurasian Migratory Waterbirds (AEWA) is an intergovernmental treaty dedicated to the conservation of migratory waterbirds and their habitats. South Africa has been a contracting party since 2002. AEWA lists the White-winged Flufftail as an intra-African migrant that requires the highest level of protection.
- [02/22 10:56] Jon Smallie
 - Hi Mervyn, in Year 1 - 4 site visits x 14 days = 56 days; in Year 2 - 6 site visits x 10 days = 60 days
- [02/22 10:56] Jon Smallie
 - thanks Sam!
- [02/22 10:56] Sam Ralston
 - This is a bit outdated, but:
https://www.cms.int/sites/default/files/publication/Whitewinged_flufftail_3_0_0.pdf
- [02/22 10:57] Jon Smallie
 - thanks

4.0 CONCLUDING

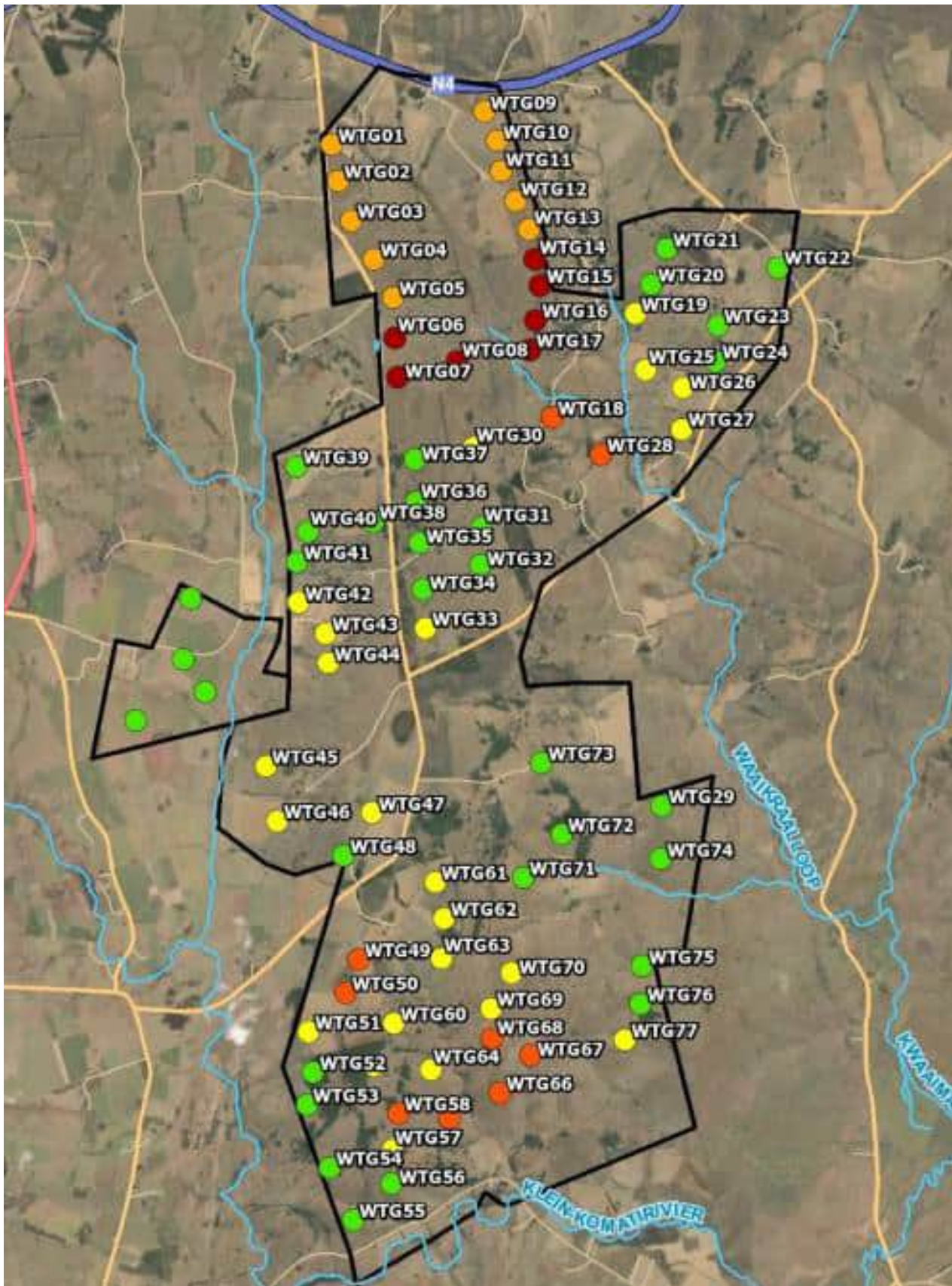
- No further comments from attendees
- Meeting concluded

MEETING NOTES

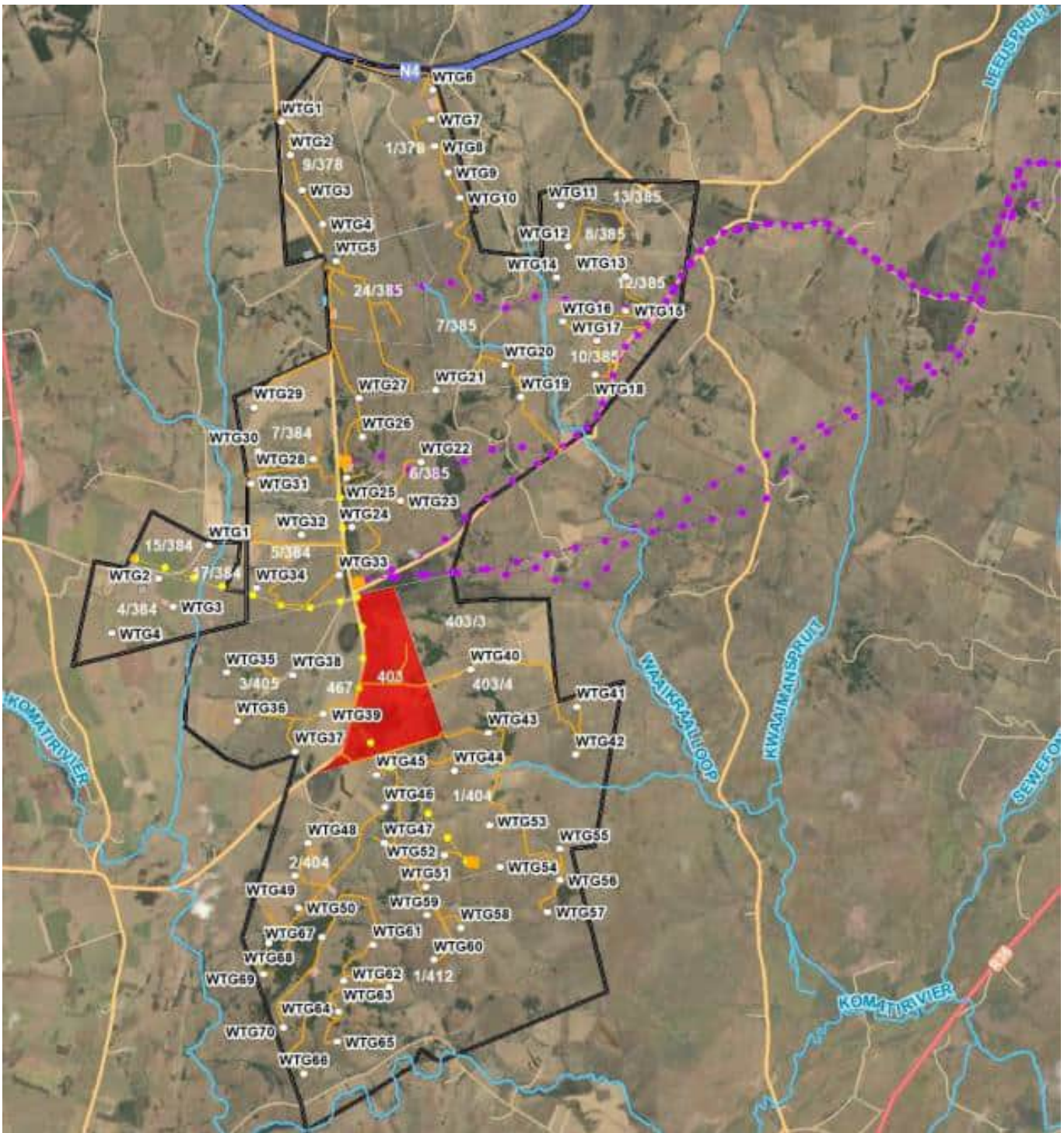
APPENDIX A – MAPS



Original 77 Turbine Layout (Pre-Optimised)

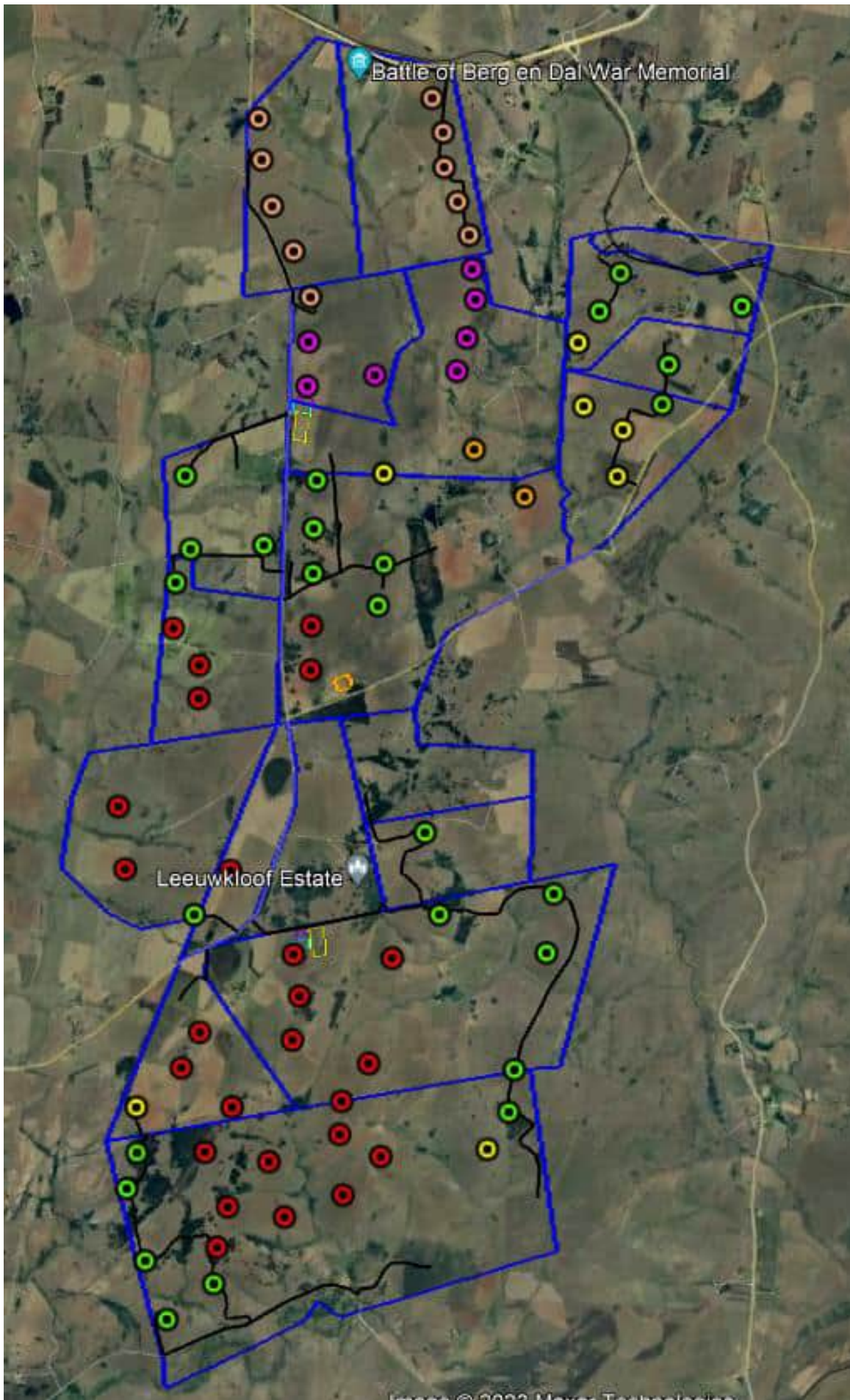


Avifauna Risk Rating – Final Scoping Report



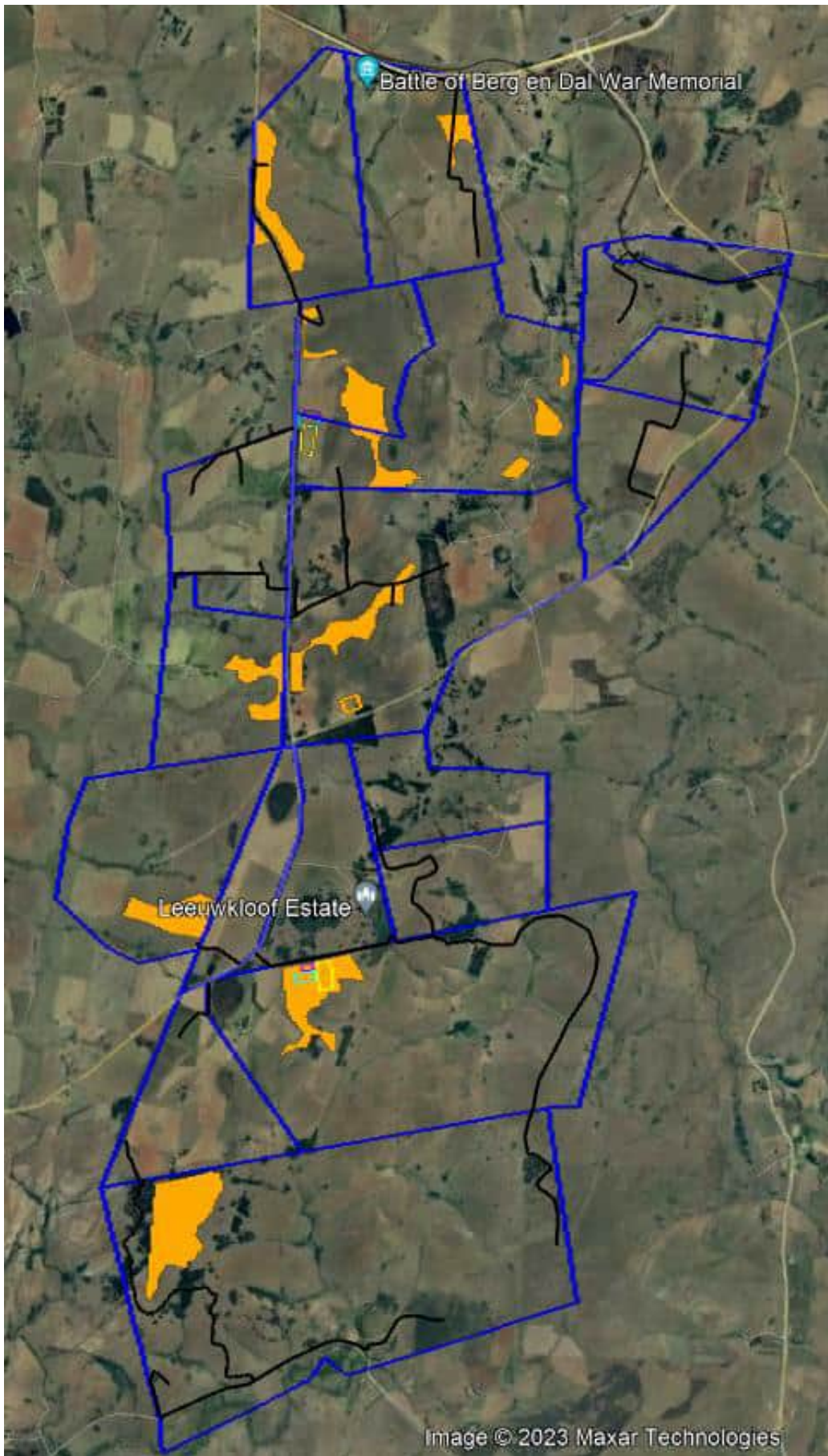
Optimised 70 Turbine Layout – Included in Final Scoping Report

MEETING NOTES



Updated Avifauna Risk Rating

MEETING NOTES



Areas possibly available for Solar Technology

APPENDIX

D

COMMENTS





forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, Tel: +27 12 399 9000, Fax: +27 86 625 1042

Reference: Dalmanutha WEF

Enquiries: [REDACTED]

Ms., Nadar, Thirushan
WSP
PO Box 98867,
Sloane Park,
2152

Telephone Number: +27 11 300 6185
Email Address: Thirushan.Nadar@wsp.com

PER E-MAIL

Dear Ms., Thirushan

COMMENTS ON THE DRAFT SCOPING REPORT FOT THE PROPOSED DALMANUTHA WIND ENERGY FACILITY, LOCATED EAST OF BELFAST IN MPUMALANGA PROVINCE

The Directorate: Biodiversity Conservation has reviewed and evaluated the reports.

According to the information provided in the report, a significant area of the proposed site falls under CBA 1, with several wetlands within the site. Mammal and birds species of conservation concern have been confirmed to be present within the site.

And as per the Avifauna specialist report the impacts of collision of birds with turbines and electrocution with powerlines have been rated to have high significance before mitigation, furthermore the report stipulates that several avifaunal features have been identified on site which require spatial protection in the form of no-go buffers. Several current turbine positions infringe on these areas and will require micro siting, with mitigation measures to being reviewed during the EIA phase. The high sensitivity theme is further supported by a stakeholder in the specialist report, that the area has sightings of birds of species of conservation concern, especially in the valley/ the gorge where Southern Bald Ibis roost.

The Directorate has noted highly sensitive themes as per the EIA screening tool. Kindly take note that any development within highly sensitive areas that will result in significant negative impacts prior mitigation measures is prohibited. Furthermore, the final report must comply with all the requirements as outlined in the Environmental Impact Assessment (EIA) guideline for renewable energy projects and the Best Practice Guideline for Birds & Solar Energy for assessing and monitoring the impact of solar energy facilities on birds in Southern Africa.



Batho pele- putting people first.

COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED DALMANUTHA WIND ENERGY FACILITY, LOCATED EAST OF BELFAST IN MPUMALANGA PROVINCE

In conclusion, the Public Participation Process documents related to Biodiversity EIA for review and queries should be submitted to the Directorate: Biodiversity Conservation at Email; [REDACTED] for the attention of [REDACTED]

Yours faithfully

[REDACTED]

Mr. [REDACTED]
Control Biodiversity Officer Grade B: Biodiversity Conservation
Department of Forestry, Fisheries & the Environment
Letter signed by: [REDACTED]
Designation: Control Biodiversity Officer Grade A
Date: 02/02/2023



Nadar, Thirushan

From: Nadar, Thirushan
Sent: Monday, 12 December 2022 21:21
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Draft Scoping Report Review

Dear [REDACTED]

Thank you for your feedback.

WSP hereby acknowledges this response and can confirm that our database has been updated with Mrs P Makitla and Ms M Mudau email addresses.

Furthermore WSP can confirm [REDACTED] email is also on our database and will receive all correspondence.

Kind regards



Thirushan Nadar
Consultant

T +27 11 300-6185
M +27 73 888-3727

From: [REDACTED]
Sent: Monday, 12 December 2022 17:03
To: Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Cc: [REDACTED]
Subject: RE: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Draft Scoping Report Review

Dear Sir/Madam

DFFE Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation to review and comment on the project mentioned on the subject line. Kindly note that the project has been allocated to Mrs P Makitla and Ms M Mudau (Both copied on this email).

Please note: All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries will be submitted to the Directorate: Biodiversity Conservation at Email: [REDACTED] for attention of [REDACTED]

Regards,
[REDACTED]

From: Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Sent: Monday, 12 December 2022 08:38
To: Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Cc: Strong, Ashlea <Ashlea.Strong@wsp.com>; Sean Maphosa <Sean.Maphosa@enertrag.com>; Mmakoena Mmola <Mmakoena.Mmola@enertrag.com>
Subject: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Draft Scoping Report Review

Dear Commenting Authority,

PLEASE FIND ATTACHED NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY, MPUMALANGA

Notice is given in terms of:

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- Vogelstruispoort 384 JT (Portion 5 and 7)
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- Leeuwkloof 404 JT (Portions 1 and 2)
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- Welgevonden 412 JT (Portion 1)
- Camelia 467 JT (Portion 0)

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DRAFT SCOPING REPORT REVIEW PERIOD

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	eMakhazeni Public Library	25 Scheeper Street, Belfast, 1100
Carolina	Carolina Public Library	11 Voortrekker St, Carolina, 1048
OneDrive	 Dalmanutha Wind Energy facility Commenting Authority	
WSP Website	https://www.wsp.com/en-ZA/services/public-documents	
Datafree Website	https://wsp-engage.com/	

Please note that you will receive a separate email with the link to the one drive. This link will then request a verification number which will automatically be sent to your email address – if it doesn't seem to come through please check your "spam" folder.

WSP contact details are:

Name: Thirushan Nadar
Tel: +27 11 300-6185
Fax: 011 361 1381
E-mail: thirushan.nadar@wsp.com
Address: PO Box 98867, Sloane Park, 2152

Protection of Personal Information: WSP will be processing certain personal information about you as an interested and affected party (I&AP) for purposes of enabling your registration as an I&AP and storing of your details on our database, if you consent for us to do so. WSP will use these details to contact you about other relevant projects in the future. WSP will always process your personal information in accordance with the Protection of Personal Information Act 4 of 2013. You are entitled to exercise your rights as a data subject and let us know if you wish to be deregistered as an I & AP or if you no longer want your contact details to be included on our database.

We look forward to your participation in this process.

Kind regards



Thirushan Nadar
Consultant

T +27 11 300-6185
M +27 73 888-3727



WSP in Africa
Building 1, Golder House, Maxwell Office Park, Magwa Crescent West, Waterfall City, Midrand
South Africa

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-LAEmHhHzdJzBITWfa4Hgs7pbKI

Nadar, Thirushan

From: Nadar, Thirushan
Sent: Monday, 12 December 2022 21:05
To: [REDACTED]
Subject: RE: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Draft Scoping Report Review
Attachments: Dalmanutha Portions.kmz

Dear [REDACTED]

Received, Thank you for the feedback.

Please see attached KMZ as requested.

Kind regards



Thirushan Nadar
Consultant

T +27 11 300-6185
M +27 73 888-3727

From: John Geeringh <GeerinJH@eskom.co.za>
Sent: Monday, 12 December 2022 13:15
To: Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Subject: RE: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Draft Scoping Report Review

Please send me a KMZ file of the affected property, proposed development footprint and proposed grid connection. Please find attached Eskom requirements for work at or near Eskom servitudes and infrastructure, as well as a setbacks guideline for renewable energy developments.

Kind regard [REDACTED]

[REDACTED] (Pr Sci Nat) Reg. EAP (EAPASA)
Senior Consultant Environmental Management
Grid Planning: Land and Rights
Eskom Transmission Division
Megawatt Park, D1Y42, Maxwell Drive, Sunninghill, Sandton.
P O Box 1091, Johannesburg, 2000.

Tel: [REDACTED]
Cell: [REDACTED]
Fax: [REDACTED]
[REDACTED]

From: Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Sent: Monday, 12 December 2022 08:38
To: Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Cc: Strong, Ashlea <Ashlea.Strong@wsp.com>; Sean Maphosa <Sean.Maphosa@enertrag.com>; Mmakoena Mmola <Mmakoena.Mmola@enertrag.com>
Subject: [CAUTION:EXTERNAL EMAIL] - NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Draft Scoping Report Review

Dear Commenting Authority,

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WSP Website	https://www.wsp.com/en-ZA/services/public-documents	
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Please note that you will receive a separate email with the link to the one drive. This link will then request a verification number which will automatically be sent to your email address – if it doesn't seem to come through please check your "spam" folder.

WSP contact details are:

Name: Thirushan Nadar
Tel: +27 11 300-6185
Fax: 011 361 1381
E-mail: thirushan.nadar@wsp.com
Address: PO Box 98867, Sloane Park, 2152

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We look forward to your participation in this process.

Kind regards



Thirushan Nadar
Consultant

T +27 11 300-6185
M +27 73 888-3727



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Building 1, Golder House, Maxwell Office Park, Magwa Crescent West, Waterfall City, Midrand
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Nadar, Thirushan

From: Nadar, Thirushan
Sent: Wednesday, 14 December 2022 10:21
To: [REDACTED]
Cc: Strong, Ashlea; Sean.Maphosa@enertrag.com; Mmakoena.Mmola@enertrag.com
Subject: RE: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Draft Scoping Report Review

Dear [REDACTED]

Thank you for the response, it is duly noted.

WSP can confirm that we have your contact details on the I&AP database for future communication regarding the proposed project.

Kind regards



Thirushan Nadar
Consultant

T +27 11 300-6185
M +27 73 888-3727

From: [REDACTED]
Sent: Tuesday, 13 December 2022 21:14
To: Nadar, Thirushan <Thirushan.Nadar@wsp.com>; [REDACTED]
Cc: Strong, Ashlea <Ashlea.Strong@wsp.com>; Sean.Maphosa@enertrag.com; Mmakoena.Mmola@enertrag.com
Subject: FW: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Draft Scoping Report Review

Dear WSP

Please register the EWT as an I&AP for this proposed development. We are concerned that this proposed site will pose a significant risk to various crane and bustard species.



[REDACTED]
Head Office: [REDACTED]
W: [REDACTED]
Email: [REDACTED]



Broad-Based Black Economic Empowerment – BBBEE Level 4 Certificate & 95% Civil Society Organisation
PBO number: 930 001 777
NPO number: 015-502 NPO
IT number: IT 6247

Physical Address: 27 and 28 Austin Road, Glen Austin AH, Midrand, 1685, Gauteng, South Africa
Postnet Suite # 027, Postnet Suite 002, Private Bag X08, Wierda Park 0149, Gauteng, South Africa



"We all have one universal and inherent commonality and that is the turmoil and joy of being human." (Bryan Little, 2012)

Nadar, Thirushan <Thirushan.Nadar@wsp.com>

Sent: Monday, 12 December 2022 08:38

To: Nadar, Thirushan <Thirushan.Nadar@wsp.com>

Cc: Strong, Ashlea <Ashlea.Strong@wsp.com>; Sean Maphosa <Sean.Maphosa@enertrag.com>; Mmakoena Mmola <Mmakoena.Mmola@enertrag.com>

Subject: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Draft Scoping Report Review

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

Dear Stakeholder,

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WSP contact details are:

Name: Thirushan Nadar
Tel: +27 11 300-6185
Fax: 011 361 1381
E-mail: thirushan.nadar@wsp.com
Address: PO Box 98867, Sloane Park, 2152

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We look forward to your participation in this process.

Kind regards



Thirushan Nadar
Consultant

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-LAEmHhHzdJzBITWfa4Hgs7pbkI

Nadar, Thirushan

From: Nadar, Thirushan
Sent: Monday, 12 December 2022 21:28
To: [REDACTED]
Subject: RE: THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY, MPUMALANGA

Dear [REDACTED]

Thank you for the feedback.

WSP can confirm that we have your contact details on the I&AP database for future correspondence.

Kind regards



Thirushan Nadar
Consultant

T +27 11 300-6185
M +27 73 888-3727

From: [REDACTED]
Sent: Monday, 12 December 2022 10:24
To: Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Subject: THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY, MPUMALANGA

Please could you register us as an interested and affected party in the above proposal.

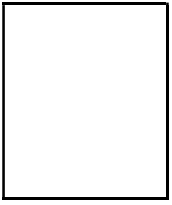
We are a registered wildlife rehabilitation centre specialising in birds of prey but deal with all indigenous wildlife in the province. We have dealt with many TOPS species from the proposed area.

The Wildlifesos Trust
P O Box 212, Dullstroom, Mpumalanga, 1110
info@wildlifesos.co.za

Kind regards

[REDACTED]
Manager
Dullstroom Bird of Prey and Rehabilitation Centre
Managed by the Wildlifesos Trust (IT000101/2015)
169-719 NPO
930053148 PBO
info@wildlifesos.co.za
www.birdsofprey.co.za

[Donate via PayPal](#)



Nadar, Thirushan

From: Nadar, Thirushan
Sent: Wednesday, 25 January 2023 14:13
To: [REDACTED]
Subject: RE: Objections/concerns regarding the Dalmanutha Wind Energy Facility

Dear [REDACTED]

Thank you for your response and comment on the Draft Scoping report for the Proposed Dalmanutha Wind Project.

Your concerns and comments have been acknowledged.

WSP can confirm that you will be kept informed on further developments regarding the project.

Kind regards



Thirushan Nadar
Consultant

T +27 11 300-6185
M +27 73 888-3727

From: [REDACTED]
Sent: Wednesday, 25 January 2023 13:21
To: Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Subject: Objections/concerns regarding the Dalmanutha Wind Energy Facility

Good afternoon Thirushan

Please find attached my responses to the scoping report.

I am also copying these to BirdLife South Africa, and also to Mervyn Lotter at Mpumalanga Parks and Tourism Authority for their information.

Please also keep me informed as to any developments regarding the project.

Regards
[REDACTED]

Environmental Concerns regarding the proposed Dalmanutha Wind Energy Project

Respondent details

Geoff Lockwood – naturalist, shareholder in property located within the project site

Email – [REDACTED]

Telephone [REDACTED]

Background

As a long-term shareholder in the De Rust Trout Farm, I've explored much of the northern-western section of the proposed development recording biodiversity over more than thirty years – both on De Rust, and on surrounding farms.

The primary focus of these studies was initially birds, but broadened out to include orchids and other taxa, most recently Odonata (dragonflies and damselflies). For several years, I have been forwarding all records for Red Data bird species, and also of orchids, to MTPA with the co-ordinates of the sightings. I've also submitted sightings data to the various atlas projects administered by the Virtual Museum, and also to SABAP2

All my records of Red Data bird species and orchid sightings were also made available to the specialists involved in the scoping exercise. Two recent sightings however need to be added to the material already supplied to the consultants.

Note: At the time I made these data available, the layout shown to me was significantly different to that laid out in the Scoping Report.

Pallid Harrier – *Circus macrourus* (Near-Threatened)

On 19 November 2022, I had a sighting of an adult male Pallid Harrier at approximate co-ordinates -25.765134°; 30.118627° (decimal degrees). The bird was hunting over the valley heading in a NW direction towards the Geluk Road and was observed for about 15 minutes over the valley – mainly over the western section. This is the second November record in four years of an adult male of this species, and the possibility that it is the same bird returning cannot be ruled out. The previous sighting was at approximate co-ordinates -25.757903°; 30.121521°, with the bird heading W towards the Geluk Road.

Note: This sighting of this species was not forwarded to the scoping assessment team as I did not include sightings of possible vagrants in that submission.

Secretarybird – *Sagittarius serpentarius* (Vulnerable)

On 15 December 2022, a single adult bird was seen swallowing a snake at approximate co-ordinates -25.748908°; 30.123378, adding to the records of this Red-listed species within the project area.

My primary objections and concerns regarding the proposed development are as follows:

- 1.1 A significant number of WTG's are proposed for the valley running SE from the Berg-en-Dal War Memorial. This area has a known, high occurrence of Red-listed avifauna including Wattled Cranes (**Critically Endangered**); Cape Vulture (**Endangered**); Secretarybird (**Vulnerable**); White-bellied Bustard (**Vulnerable**); Southern Bald Ibis (**Vulnerable**); Black-rumped Buttonquail (**Vulnerable**); Yellow-breasted Pipit (**Vulnerable**), Lanner (**Vulnerable**); Peregrine (**Near-Threatened**) and Pallid Harrier (**Near-threatened**). In addition, I've recorded Denham's Bustard (**Vulnerable**) on the western side of the valley on one occasion. The proposed sites for these WTG's pose a real risk to the local, and in some cases, the national populations of these species.

In the case of the Wattled Crane in particular, up to four birds have been recorded in this valley – a significant part of South Africa's wild population.

Barn Swallows and Amur Falcons occur in numbers during mid-to-late summer, with the swallows frequently roosting in the Phragmites reedbeds at the inflow to the De Rust dam. In some years this roost contains an estimated 10,000 birds. Both species could sustain significant losses.

While a remote sensing and emergency shut-down procedure has been proposed to detect approaching birds and to rapidly stop the affected turbine(s), I have no information as to the efficacy

of this mitigation. I am also unaware whether the proposed system will detect and respond effectively to the smaller species such as Black-rumped Buttonquail and Yellow-breasted Pipit. The former species probably undertakes long-distance movements at night (the related Common Buttonquail does), while the latter undertakes display flights which would put it at risk of collision with the turbine blades.

The valley is prone to episodes of thick mist, with visibility falling to less than 10 m on occasion (pers. obs.), and this could also increase the risk of collisions with the installations for all bird species.

1.2 Noise impacts on birds

While the scoping report discusses noise impacts in respect of human receptors i.e. at people at dwellings etc. there appears to have been no recognition or investigations as to the possible negative impacts of turbine noise on the surrounding bird populations.

Research in Holland for example has shown that traffic noise caused a decline in the nesting populations of Willow Warbler – *Phylloscopus trochilus* in an adjacent wood, with the cause put down to sonic interference with vocalisations of the males – particularly those used in territorial defence and mate attraction.

If turbine noise falls in the same frequency range as say that of the deep hooting calls of Black-rumped Buttonquail, collision risks apart, this could render the area completely unsuitable for this species.

Sound pressure for some distance around the WTG's could drown out or suppress any communications between conspecifics, again making large parts of the valley unsuitable for a variety of bird species. Based on this, I would question a number of the risk level assessments in the scoping report and strongly suggest that these be revisited.

Some scientific papers on the impacts of noise on birds

Y. Teff-Seker; O. Berger-Tal; Y. Lenhhardt, and N. Teshner 2022: Noise pollution from wind turbines and its effects on wildlife: A cross-national analysis of current policies and planning regulations. Renewable and Sustainable Energy Reviews, Science Direct.

Conomy, J.T.; Dubovsky, J.A.; Collazo, J.A. and Fleming, W.J. 1998. Do Black Ducks and Wood Ducks Habituate to Aircraft Disturbance? The Journal of Wildlife Management, Vol. 62, No 3 (Jul. 1998): 1135 – 1142.

Grubb, M.M. 1979. Effects of Noise Levels on Nesting Herons and Egrets. Proceedings of the Colonial Waterbird Group, Vol. 2 (1979): 49 – 54.

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For the reasons given above, I WOULD NOT SUPPORT THE INSTALLATION OF ANY WTG's IN THIS VALLEY! In particular, all of the following WTG sites are either in, or within dangerous proximity to places where I have recorded Wattled Cranes and/or other Red Data bird species.

Problematic WTG sites

WTG 02	WTG 03	WTG 04	WTG 05	WTG 06	WTG 07
WTG 08	WTG 12	WTG 13	WTG 14	WTG 15	WTG 16
WTG 17					

In addition, the following sites may pose a threat to Red-listed bird species and I request that a detailed evaluation is performed to determine the extent of any risk.

WTG 18	WTG 30	WTG 37
--------	--------	--------

3. Odonata diversity

I have recorded a significant diversity of Odonata within the project area – primarily around the De Rust dam. Endemic/limited-range species such as Springwater Sprite – *Pseudagrion caffrum*, Sapphire Bluet – *Africallagma sapphirinum* and Round-winged Bluet – *Proischnura rotundipennis* amongst others have been identified and photographed.

Such diversity is considered an indicator of a healthy aquatic ecology and good water quality.

It is essential therefore that any development of roads, CWT sites etc. involved in the installation or operation of the project does not alter current flow patterns or compromise water quality in any way.

4. At least two orchid species – *Habenaria anguiceps* and *Disa aconitoides* are likely to be extirpated should the installation of WTG 14 and 15 go ahead. The co-ordinates of these populations were provided to the scoping phase ecologist and both sites are likely to experience significant disturbance during the construction phase. *D. aconitoides* is an uncommon orchid in Mpumalanga and is usually recorded either as single plants, or in small colonies, while there are very few localities known for *H. anguiceps* in the province. Efforts to remove these populations and re-establish them elsewhere are unlikely to prove successful.

5. Noise

From the scoping report it appears that the farm house – (Receptor 16 in Figure 5-31) is between 500 and 850 m from the closest turbine, with at least two others that appear to be within 1000 m of the house (WTG's 13, 14 & 15 to the west of the house). There is also the possibility of noise disturbance arising from WTG's 19, 20 & 21 situated to the SE of the house. Site topography might mitigate noise to a certain extent but it is likely that the people using De Rust will experience negative impacts due to turbine noise (operational phase), and also during the construction phase. **Note:** Most shareholders of De Rust have invested in the enterprise for its tranquillity and this experience is likely to be significantly degraded if these WTG's are deployed at the proposed locations.

6. De Rust's water supply

All water for the house and staff housing is drawn from a spring just N of the farm's northern boundary at approximate co-ordinates (decimal degrees) – 25.754225°; 30.129224°.

It is essential that any activity, including the development of roads, CWT sites etc. involved in the installation or operation of the project does not compromise either water flow or water quality and safety.



agriculture, rural development,
land & environmental affairs

MPUMALANGA PROVINCE
REPUBLIC OF SOUTH AFRICA

Building 4, Aqua Street, Riverside Park, Mbombela, 1200, Mpumalanga Province, P.O Box 266, Mbombela, 1200
Tel: +27 (013) 759 4000

Litiko Letekulima, Kufutukiswa
Kwetindzawo Tasemakhaya, Temhlaba
Netesimondzawo

Departement van Landbou,
Landelike Ontwikkeling,
Grond en Ongewing Sake

umNyango weZelimo
UkuThuthukiswa kweNdawo zemaKhaya,
iNarha neeNdaba zeBhoduluko

Enquiries :
Telephone :
Reference :



Ms. Ashlea Strong
WSP Group Africa (Pty) Ltd
P O Box 98867
Bryanston
2152

Email: Ashlea.Strong@wsp.com

Dear Madam,

DRAFT SCOPING REPORT: ACTIVITIES ASSOCIATED WITH THE PROPOSED DALMANUTHA WIND ENERGY FACILITY ON VARIOUS PORTIONS OF THE FARMS BERG EN DAL 378 JT, VOGELSTRUISPOORT 384 JT, WAAIKRAAL 385 JT, LEEUWKLOOF 403 AND 404 JT, GELUK 405 JT, WELGEVONDEN 412 JT AND CAMELIA 467 JT, BELFAST, MPUMALANGA PROVINCE

The Department confirms having received the draft scoping report from you for the abovementioned project on 12 December 2022. After reviewing the report, this Department has the following comments:

1. The proposed Dalmanutha Wind Energy Facility is located in an area comprising a **high diversity of Red Listed Birds**, which as confirmed in the Scoping Report, use the full component of micro-habitats on the site.
2. The **Critically Endangered** Wattled Crane has been reported to be breeding on site, and there are reports of regular sitings of between one and four individuals within the proposed development footprint.
3. The risk of collision of **many threatened bird species** and Red Listed bats on wind turbines, and the risk of collision and electrocution of these species on the MV network is **high**, with the scoping report assigning a high significance rating before mitigation.
4. On 11 November 2022, the Minister of the Department of Forestry, Fisheries and the Environment gazetted her intent to establish protocols that provide the criteria for the specialist assessment and minimum report content requirements for determining impacts on Cape Vultures associated with the development of onshore wind energy generation facilities, which require environmental authorisation (Notice 2734, Government Gazette, 11 November 2022). The draft protocol prescribes a High to Very High Sensitivity to sites that are located within 50km of a Cape Vulture roost, colony and/or vulture restaurant, and **recommends abandoning proposals for wind energy in such areas**. According to the scoping report, a number of roosts have been identified **on the site**.
5. Shutdown-on-demand is not considered an appropriate means to mitigate the residual negative impacts associated with fatalities of large bodied birds that are listed as threatened.
6. The Scoping Report confirmed that mitigation to reduce or avoid turbine collisions is not possible through spatial avoidance (buffers), and it is our opinion that mitigation is not possible through shutdown-on demand or any other means. The potential loss of critically endangered species must therefore be regarded as a fatal flaw.



According to Regulation 22(b)(i), the competent authority must, within 43 days of receipt of a scoping report – refuse environmental authorisation if – the proposed activity is in conflict with a prohibition contained in legislation.

This Department recommends the refusal of the application in terms of 22(b)(i) on the following grounds:

- The Endangered Cape Vulture, Grey Crowned Crane and the **Critically Endangered** Wattled Crane, which are confirmed to occur on site (along with a host of Red Listed birds), will be impacted and even likely lost. Mitigation measures proposed to reduce the significance of this impact, which includes painting of blades or shutdown-on-demand, are not likely to result in avoidance of collisions. Since the outcome of such mitigation is unreliable, the potential loss of a critically endangered species must be regarded as a fatal flaw.
- This Department is therefore of the opinion that the proposed Dalmanutha Wind Energy Facility is not in line with the National Environmental Management Principle that requires that sustainable development must consider the application of a risk-averse and cautious approach that takes into account the limits of current knowledge about the consequences of decisions and actions.
- It is this Department's opinion that, based on the above points, the project is not in line with the National Environmental Management Principle that specifically requires that a development must be socially, environmentally and economically sustainable, as the disturbance of 'ecosystems' and loss of biological diversity cannot be avoided, minimized or remedied.

Please contact this office for any further enquiries.

Sincerely,

[Redacted Signature]

DIRECTOR: ENVIRONMENTAL IMPACT MANAGEMENT

DATE: 02/02/2023

CC.

[Redacted]
Department of Fisheries, Forestry and the Environment
Email: [Redacted]



BirdLife South Africa is a partner of BirdLife International, a global partnership of nature conservation organisations.
Member of IUCN (International Union for Conservation of Nature).

Reg No: 001 – 298 NPO
PBO Exemption No: 930004518

WSP Group Africa
Attention: Thirushan Nadar
E-mail: Thirushan.Nadar@wsp.com

26 January 2023

Dear Thirushan,

Re: Draft Scoping Report for the Proposed Dalmanutha Wind Energy Facility

Thank you for the opportunity to comment on the draft Scoping Report for the proposed Dalmanutha Wind Energy Facility. We attended a pre-application meeting with Enertrag regarding the proposed project on 26 October 2022. Unfortunately, the avifaunal specialist, Jon Smallie, was unable to attend the meeting, but we summarised our concerns and recommendations in subsequent emails to Jon. Our recommendations are not, however, reflected in the Scoping Report or Plan of Study for EIA. Many of our comments are therefore repeated below.

BirdLife South Africa supports the responsible development of renewable energy infrastructure. However, we are concerned that the location of the proposed facility(ies) is not compatible with the desired state of the habitat by local, provincial and national stakeholders. The proposed development site borders an Important Bird and Biodiversity Area, and includes threatened ecosystems, critical biodiversity areas, ecological support areas, protected area expansion strategy areas and habitat for a number of threatened species.

The highveld of Mpumalanga hosts globally and regionally threatened species that are not found in similar abundances in other provinces. Several species are becoming locally extinct, some of which are found at the proposed site (e.g., Wattled Crane). These high-elevation habitats are often used for breeding during the wet season. Given the relatively small remaining portion of untransformed Grasslands and Wetlands in the highveld of Mpumalanga, every step should be taken to safeguard what is left of these habitat types for biodiversity.

We suggest alternative sites should be considered for development. For example, development west of Ermelo, where land is already heavily transformed, is less likely to impact biodiversity, whereas the Eastern Escarpment should be avoided.

Given the sensitivity of the biodiversity within the Project Area of Influence, we are pleased to note that two years of data collection will be conducted for the avifaunal impact assessment. However, it is unclear from the Scoping Report if the data collection methods will be adequate to verify the sensitive features and questions that have been scoped thus far, or those raised below.

We are concerned that the Project Area of Influence is not well defined in the context of different impact receptors. Please see [SANBI's Species Environmental Assessment Guidelines](#) for more guidance in this regard. It may be necessary to conduct surveys outside of the development footprint (e.g., to

Isdell House, 17 Hume Road
Dunkeld West, Gauteng 2196
Private Bag X16, Pinetown
2123, South Africa
Tel: +27 (0)11 789 1122
Fax: +27 (0)11 789 5188
Email: info@birdlife.org.za
www.birdlife.org.za



identify and quantify the use of roosts and breeding sites) and this should be clearly defined during scoping.

We are further concerned that the development site is along the Eastern Escarpment of South Africa. This geographical feature is a flyway for latitudinal (north to south) and altitudinal (east to west) migrants of species moving within (e.g., cranes, bustards, Southern Bald Ibis, Blue Swallow) and beyond the continent (e.g., White Stork, Amur Falcon). The extensive wetland system at the site would offer stop-over sites for migrants transitioning through the landscape. Tracking data should be acquired from past studies/literature to identify which migrants are using this area and when. Alternatively, other methods (e.g., radar or tracking studies) should be included in the plan of study for impact assessment in order to assess the risk to migratory birds.

We suggest that the scoping report and plan of study should place greater focus on potential risks to the globally Critically Endangered White-winged Flufftail. South Africa and Ethiopia are the only two countries with confirmed breeding records of this highly cryptic species. It is unlikely to be found from observations and we discourage flushing the bird from wetlands. Not far to the north of the proposed site is a stronghold for the species in the Greater Lakenvlei Protected Environment and Middelpunt Nature Reserve. It is likely that the bird is also using the wetlands at the proposed site. Not much is known about where and when the species migrates to breed in high-elevation wetlands during the wet season (October-March), but birds have been found all along the Eastern Escarpment from the Steenkampsberg in Mpumalanga to southern KZN. Three other species of flufftail have been recorded as fatalities at South African wind farms and we are concerned that it is unlikely that shutdown-on-demand will be an effective mitigation for this small and cryptic species.

BirdLife South Africa encourages the use of shutdown-on-demand as mitigation to address residual negative impacts associated with fatalities of larger bodied birds. However, we caution that this approach is not appropriate for turbines proposed in areas where they will pose a significant risk to threatened species (where avoidance would be more effective and appropriate). Shutdown-on-demand can be fraught with challenges related to implementation and human (or technological) error, and is poorly enforced. While shutdown-on-demand can be helpful to reduce the risk of fatalities, it does not eliminate it. Fatalities of large-bodied birds, including vultures, Secretarybird and raptors have occurred at wind farms in South Africa implementing this approach.

The ecosystem status of the vegetation types reflected in the draft Scoping Report and Biodiversity Scoping Report appear to be incorrect or outdated. Both Eastern Highveld Grassland and KaNgwane Montane Grassland are Endangered (not Vulnerable and Least Threatened as indicated in the Scoping Report, respectively). The Scoping Report and Impact Assessment need to be updated to accurately reflect the status of these ecosystems.

The Screening Report does indicate the likely presence of an Endangered ecosystem. To avoid similar mistakes, all biodiversity specialists should be encouraged to pay careful attention and verify the rich information and many sensitivity layers included in the National Environmental Screening Tool.

In conclusion, we are of the opinion that there is sufficient data to suggest the site (or a large proportion of the site) is inappropriate for wind farm development due to the significant risks posed to biodiversity. It is unlikely that additional studies will reduce the site sensitivity and the applicant risks “throwing good money after bad”. However, if they wish to pursue development in this area, we

strongly suggest that a) more attention is paid to reduce risks, uncertainties discussed above and flagged in the Site Screening Tool; b) the effectiveness and feasibility of proposed mitigation measures must be robustly assessed; and c) biodiversity offsets should be considered, as it is unlikely that mitigation alone will ensure that there is no net loss of biodiversity.

Please do not hesitate to contact us to clarify our position. Please use our emails below for further consultations related to this project.

Yours sincerely,

[REDACTED]

Wetland Conservation Project Manager/Rockjumper Fellow of White-winged Flufftail Conservation

Email: [REDACTED]

and

[REDACTED]

Birds and Renewable Energy Project Manager

Email: [REDACTED]

Nadar, Thirushan

From: Nadar, Thirushan
Sent: Tuesday, 10 January 2023 09:24
To: [REDACTED]
Cc: Strong, Ashlea
Subject: RE: DALMANUTHA WEST WIND FACILITY IAP

Dear [REDACTED]

Thank you for your response.

WSP can confirm that we have added your details on to our I&AP database for future communication regarding the Dalmanutha WEF project.

Kind regards



Thirushan Nadar
Consultant

T +27 11 300-6185
M +27 73 888-3727

From: [REDACTED]
Sent: Friday, 06 January 2023 01:50
To: Strong, Ashlea <Ashlea.Strong@wsp.com>
Cc: [REDACTED]
Subject: DALMANUTHA WEST WIND FACILITY IAP

Good evening Mr Strong

I am a resident in the Emakhazeni Municipality and also a professional Civil Engineer running a construction company.

Would like to participate in the Dalmanutha West Wind Facility as a service provider and as a member of the community (IAP).

My details are as follows

[REDACTED]
Company: Carabex (Pty) Ltd

Email: [REDACTED]

Contact Numbers: [REDACTED]

Office address: [REDACTED]

Home address: [REDACTED]

Regards

Our Ref:



an agency of the
Department of Arts and Culture

T: [REDACTED]

South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: [REDACTED]

Tel: [REDACTED]

Email: [REDACTED]

CaseID: 20349

Date: Thursday January 26, 2023

Page No: 1

Interim Comment

In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Enertrag South Africa (Pty) Ltd

ENERTRAG South Africa (Pty) Ltd (ENERTRAG SA), under two Special Purpose Vehicles (SPVs) Dalmanutha Wind RF (Pty) Ltd and Dalmanutha West Wind RF (Pty) Ltd, proposes to develop the Dalmanutha Wind Energy Complex, comprising the Dalmanutha Wind Energy Facility and the Dalmanutha West Wind Energy Facility, including the respective grid connection infrastructure for each project, and common grid connection infrastructure for both projects, near Belfast, in the Mpumalanga Province. The projects aim to supply suitable private off-taker initiatives (direct supply or wheeling agreements, as applicable), or be bid into the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP) or similar procurement programme under the Integrated Resource Plan (IRP). Once built, the projects are intended to connect either directly to nearby off-takers or to the 132/400kV Eskom Gumeni Main Transmission Substation through a Common Collector Substation and powerline of up to 132kV.

WSP Group Africa (Pty) Ltd has been appointed by Dalmanutha WEF (RF) (Pty) Ltd to undertake an Environmental Authorisation Application for the proposed Dalmanutha Wind Energy Facility (WEF), near Belfast, Mpumalanga Province.

A Draft Scoping Report (DSR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The proposed activities will include the construction of up to 77 turbines, permanent hardstanding area for each turbine, IPP portion onsite substation and Battery Energy Storage System (BESS), operation and maintenance buildings, construction camp and laydown areas, sewage facilities, cement batching plant, access and internal roads, underground cabling between components, fencing, storm water channels, water pipelines, ablution facilities and gatehouse within an application area of 400 ha.

Beyond Heritage was appointed to provide heritage specialist input as part of the EA process as per section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Van der Walt, J. 2022. Heritage Scoping Report for the Dalmanutha Wind Energy Facility and associated infrastructure, Mpumalanga Province, South Africa.

Our Ref:



an agency of the
Department of Arts and Culture

T: [REDACTED]

South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: [REDACTED]

Tel: [REDACTED]

Email: [REDACTED]

CaseID: 20349

Date: Thursday January 26, 2023

Page No: 2

Several heritage resources are located within and in close proximity to the proposed development area. These include several burial sites, a war memorial, the Berg en Dal Monument.

Recommendations provided in the report include the following:

- It is recommended that the study area should be subjected to a field-based Heritage Impact Assessment (HIA) and a VIA;
- The study area is of low to very high palaeontological sensitivity and according to the SAHRIS palaeontological sensitivity map must be subjected to a palaeontological assessment in the impact assessment phase.

Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit notes the Heritage Scoping Report and the recommendations of the specialist. The HIA must consider any comments provided during the public participation phase with regards to direct and indirect impacts to heritage resources, including the Berg en Dal monument.

Further comments will be issued upon receipt of the above pending reports and draft EIA inclusive of appendices.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

[REDACTED]

[REDACTED]
Heritage Officer

South African Heritage Resources Agency

Our Ref:



an agency of the
Department of Arts and Culture

T: [REDACTED]

South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: [REDACTED]

Tel: [REDACTED]

Email: [REDACTED]

CaseID: 20349

Date: Thursday January 26, 2023

Page No: 3



[REDACTED]
Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/611063>



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447· PRETORIA 0001· Environment House 473 Steve Biko Road, Arcadia,· PRETORIA

DFFE Reference: 14/12/16/3/3/2/2243

Enquiries [REDACTED]

E-mail: [REDACTED]

Ms Ashlea Strong
WSP Group Africa (Pty) Ltd
WSP House Building C Knightsbridge
33 Sloane Street
BRYANSTON
2191

Telephone Number: (011) 361 1392
Email Address: Ashlea.strong@wsp.com

PER E-MAIL

Dear Ms Strong

COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED DALMANUTHA WIND ENERGY FACILITY (WEF) AND ITS ASSOCIATED INFRASTRUCTURE NEAR BELFAST, MPUMALANGA PROVINCE

The Application for Environmental Authorisation and draft Scoping Report (SR) dated December 2022, and received by the Department on 09 December 2022, refer.

This letter serves to inform you that the following information must be included to the final SR:

(a) Specific Comments

- (i) Please provide a concise, but complete, summary and bullet list of the project description and associated infrastructure (or project scope). This must include a list of all development components and associated infrastructure.
- (ii) Kindly ensure the development footprints (hectares/square metres) and specifications of all proposed infrastructure and associated infrastructure during all phases are included in the final SR.
- (iii) The co-ordinates must be specific to each activity and infrastructure that is proposed on the site. The co-ordinates for substations and the battery energy storage systems (BESS) must be included in the report, i.e., we require that you provide us with the specific development footprints for each development parameter, and not an area outlining the entire site.
- (iv) Several activities applied for in the application form is said to occur within protected areas, such as Activity 4(f)(i) (aa)(bb) and Activity 10(f)(i) (aa)(bb) of Listing Notice 3 of the EIA Regulations 2014, as amended. Therefore, approval from the Management Authority in terms of the National Environmental Management: Protected Areas Act, 2003; Section 50(5) for commercial and community activities in the National Park, and/or World Heritage Site may be required. Comments from this Department's Protected Areas Directorate must be obtained to confirm whether Approval from the Management Authority in terms of the National Environmental Management: Protected Areas Act, 2003; Section 50(5) is required.

JCA

Find below the contact details for personnel at this Department's Protected Areas Directorate:

- a) Name: Mr Rofhiwa
Telephone no: (012) 399 8801
Email: RMagodi@dffe.gov.za; and
 - b) Name: Tshwanelo Leballo
Telephone no: (012) 399 9561
Email: tleballo@dffe.gov.za.
- (v) Kindly take note that when finalising the layout plan the position of all proposed infrastructure and linear activities, which includes but not limited to the following must be illustrated:
- Wind turbines (the proposed 70 turbines should be numbered on the layout plan);
 - Access roads and internal roads;
 - IPP portion onsite substation;
 - Battery energy storage systems (BESS);
 - Operation and maintenance buildings; and
 - Construction camp laydown areas.
- (vi) According to the Mpumalanga Biodiversity Sector Plan, 2015, Wind Farms are not compatible land-use activities to be undertaken in areas classified as CBA 1. Therefore, the mitigation hierarchy should be applied in full, and a Biodiversity Offset should be considered to ensure that significant residual impacts of the development are remedied.
- (vii) Further to the above, this must be included and addressed in the Plan of Study of the final SR.

(b) Listed Activities

- (i) Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description.
- (ii) If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link <https://www.dffe.gov.za/documents/forms>.

(c) Layout & Sensitivity Maps

- (i) The final SR must provide coordinate points for the proposed development site (note that if the site has numerous bend points, at each bend point coordinates must be provided) as well as the start, middle and end point of all linear activities.
- (ii) All preferred turbine positions must be clearly numbered. The turbine position numbers must be consistently used in all maps to be included in the reports.
- (iii) Please provide a layout map which indicates the following:
 - a) The proposed position of the 70 wind energy turbines, laydown areas, internal and external roads, substations, BESS, operational and maintenance buildings etc.;
 - b) The proposed WEF and associated infrastructure, overlain by the sensitivity map;
 - c) All supporting onsite infrastructure e.g. roads (existing and proposed);
 - d) The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected;
 - e) Buffer areas; and
 - f) All "no-go" areas.
- (iv) The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure.
- (v) Google maps will not be accepted.

(d) Alternatives

- (i) Please provide a description of any identified alternatives for the proposed activity that are feasible and reasonable, including the advantages and disadvantages that the proposed activity or alternatives will have on the environment and on the community that may be affected by the activity as per Appendix 2 of GN R.982 of 2014 (as amended).
- (ii) Alternatively, you should submit written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 2.

(e) Public Participation Process

- (i) The newspaper advertisement attached under Appendix F-3 is deemed inadequate. Kindly include an actual copy of the newspaper advertisement that formed part of the public participation process for this project in the final SR. The newspaper advert provided should depict the name of the newspaper and date of publication of the advert. It should also be clear and legible.
- (ii) Please provide photographs of the erected site notices placed around the boundaries of the proposed site.
- (iii) Comments must be obtained from this Department's Biodiversity Conservation Directorate at BCAdmin@dffe.gov.za and this Department's Protected Areas Directorate at RMagodi@dffe.gov.za.
- (iv) Please ensure that all issues raised and comments received during the circulation of the SR from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final SR, including comments from this Department, and must be incorporated into a Comments and Response Report (CRR).
- (v) Proof of correspondence with the various stakeholders must be included in the final SR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.
- (vi) The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 and 44 of the EIA Regulations 2014, as amended.
- (vii) A comments and response trail report (C&R) must be submitted with the final SR. The C&R report must incorporate all historical comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Annexure 1 of this comments letter. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as "Noted" is not regarded as an adequate response to I&AP's comments.
- (viii) The final SR must provide evidence that all identified and relevant competent authorities have been given an opportunity to comment on the proposed development.

(f) Specialist Assessments

- (i) A detailed description as well as any associated assessments related to the technology required for the Battery Energy Storage System (BESS) must be included in the Plan of Study of the final SR.
- (ii) The specialists undertaking the Terrestrial and Aquatic Biodiversity Report and the Geotechnical Desktop Assessment failed to submit signed Specialist Declaration of Interest forms. All Specialist Declaration of Interest forms must be signed by the relevant specialists and attached to the final SR. The forms are available on the Department's website (please use the Department's template).
- (iii) The final EIAR and all the attached specialist studies must indicate and adequately assess a consistent number of turbines.
- (iv) The EAP must ensure that the terms of reference for all the identified specialist studies include the following:

- a) A detailed description of the study's methodology; indication of the locations and descriptions of the development footprint, turbine positions and all other associated infrastructures that they have assessed and are recommending for authorisation.
- b) Provide a detailed description of all limitations to the studies. All specialist studies must be conducted in the right season and providing that as a limitation will not be allowed.
- c) Please note that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the 'no-go' areas.
- d) Should the specialist definition of 'no-go' area differ from the Department's definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.
- e) **All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.**
- f) **Bird and Bat specialist studies must have support from Birdlife South Africa and SABAA.**
- g) Should a specialist recommend specific mitigation measures, these must be clearly indicated.
- (v) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expertise advice.
- (vi) Please ensure that all mitigation recommendations are in line with applicable and most recent guidelines.
- (vii) It is further brought to your attention that 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 National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols.
- (viii) As such, the Specialist Declaration of Interest forms must also indicate the scientific organisation registration/member number and status of registration/membership for each specialist.
- (ix) Please also ensure that the final SR includes the Site Verification Report as required by the relevant environmental themes and assessments.
- (x) Please note further that the protocols, if applicable, require certain specialists' to be SACNASP registered. Please ensure that the relevant specialist certificates are attached to the relevant reports.
- (xi) We note that the screening tool indicates that seventeen specialist studies need to be undertaken or conducted. We note that the SR does not include seventeen specialist reports. Please kindly peruse the protocols and provide in the SR site sensitivity reports for each theme/study listed, as well as compliance statements for assessments not needed to be conducted based on your site sensitivity verification.

(g) Cumulative Assessment

- (i) Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:
 - a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.
 - b) Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.
 - c) The cumulative impacts significance rating must also inform the need and desirability of the proposed development.

- d) A cumulative impact environmental statement on whether the proposed development must proceed.

General

You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that:

“If S&EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority”

You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of scoping reports in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.

Further note that in terms of Regulation 45 of the EIA Regulations 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).

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.

Yours sincerely

**Acting Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment**

Signed by: 

Designation: Deputy Director: Priority Infrastructure Projects

Date: 27 January 2023

cc:	Mercia Grimbeek	Dalmanutha Wind (RF) Pty Ltd	Email: mercia.grimbeek@enertrag.com
	Charity Mthimunye	MDARDLEA	Email: cnmthimunye@mpg.gov.za

Annexure 1

Format for Comments and Response Report:

Date of comment, format of comment name of organisation/I&AP,	Comment	Response from EAP/Applicant/Specialist
27/03/2021 Email Department of Forestry, Fisheries and the Environment: Priority Infrastructure Projects (Joe Soap)	Please record C&R trail report in this format. Please update the contact details of the provincial environmental authority.	EAP: (Noted) The C&R trail report has been updated into the desired format, see Appendix K. EAP: Details of provincial authority have been updated, see page 16 of the Application form.



EMAKHAZENI LOCAL MUNICIPALITY

25 Scheepers Street
Belfast, 1100
P. O Box 17
Belfast, 1100

Tel: [REDACTED]
Fax: [REDACTED]

E-mail: municipality@emakhazenilm.co.za

Office of the Municipal Manager

Enquiries: [REDACTED]

Date: 05 January 2023

WSP Group Africa (Pty) Ltd

Building C

Knightsbridge

33 Sloane Street

Bryanston

2191

Attention: Thirushan Nadar

**SUBJECT: DALMANUTHA WIND ENERGY FACILITY (UP TO 300MW): DRAFT ENVIRONMENTAL SCOPING REPORT
EMAKHAZENI LOCAL MUNICIPALITY, MPUMALANGA PROVINCE**

The Emakhazeni Local Municipality (ELM) has assessed the above-mentioned report prepared by WSP Group Africa (Pty) Ltd on behalf of Dalmanutha WEF (RF) (Pty) Ltd and wish to comment as follows:

- 1. Waste management:** The applicant had indicated that "the hazardous waste generated on site will be collected and disposed at appropriately licenced landfill site and proof of disposal will be retained by the contractors and the facility operators" (page 176) therefore, the municipality would like to commend that. In addition, ELM would like to emphasize that general waste that will be generated on site must be disposed of at an appropriate licenced disposal facility as well, and a signed copy of waste disposal permit must be made available when required.
- 2. Water supply:** The ELM would like to state that, should it happen that the applicant will use water from Municipal water supply; the applicant must have the letter of service level agreement with the Municipality. On the other hand, any potential impact on localized surface water must be prevented, and any pollution problems that may arise should be addressed by the applicant.

Vision:

A developmental local municipality striving to accelerate provision of quality services to the satisfaction of our communities

**DALMANUTHA WIND ENERGY FACILITY (UP TO 300MW): DRAFT ENVIRONMENTAL SCOPING REPORT
EMAKHAZENI LOCAL MUNICIPALITY, MPUMALANGA PROVINCE**

3. Ablution facilities: The applicant must note that the use of any chemicals or fertilizers, herbicides, insecticide as well as temporary and chemical toilet facilities must not cause any pollution to a water resource or pose any health hazard. Should it happen that the applicant would dispose the waste at the municipal waste-water treatment works, the applicant must have a service level agreement with the ELM. Any pollution problems that may arise from the above should be addressed immediately by the applicant.

For enquiries, please do not hesitate to contact Mr. Anza Nefale on the contact details listed above, alternatively on e-mail address: [REDACTED]

Trust you shall find the above in good order.

Yours faithfully,

[REDACTED]

MUNICIPAL MANAGER



Vision:
A developmental local municipality striving to accelerate provision of quality services to the satisfaction of our communities

Nadar, Thirushan

From: Nadar, Thirushan
Sent: Tuesday, 07 February 2023 13:47
To: [REDACTED]
Cc: [REDACTED]
[REDACTED] RE: Registration as I&AP: Dalmanutha Wind Energy Facility

Tracking:	Recipient	Delivery
	[REDACTED]	
	[REDACTED]	
	[REDACTED] y	
	Strong, Ashlea	Delivered: 2023/02/07 13:47

Dear [REDACTED]

Thank you for the response.
WSP can confirm that we have added [REDACTED] as an I&AP on the Dalmanutha WEF project.

Kind regards



Thirushan Nadar
Consultant

T +27 11 300-6185
M +27 73 888-3727

From: [REDACTED]
Sent: Tuesday, 07 February 2023 12:00
To: Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Cc: [REDACTED]
Subject: Registration as I&AP: Dalmanutha Wind Energy Facility

Good morning Thirushan,

I hope that this mail finds you well?

Please register [REDACTED] as an I&AP in the Dalmanutha Wind Energy Facility EA process going forward? Please also reply with confirmation of registration.

Thank you very much, looking forward to future engagement.

Kind regards,



Market Analyst
G7 Renewable Energies (Pty) Ltd

5th Floor, 125 Buitengracht Street
Cape Town 8001, South Africa

[REDACTED] tension)

www.g7energies.com

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agriculture, rural development,
land & environmental affairs

MPUMALANGA PROVINCE
REPUBLIC OF SOUTH AFRICA

Building 4, Aqua Street, Riverside Park, Mbombela, 1200, Mpumalanga Province, P.O Box 266, Mbombela, 1200
Tel: +27 (013) 759 4000

Litiko Letekulima, Kufutukiswa
Kwetindzawo Tasemakhaya, Temhlaba
Netesimondzawo

Departement van Landbou,
Landelike Ontwikkeling,
Grond en Ongewing Sake

umNyango weZelimo
UkuThuthukiswa kweNdawo zemaKhaya,
iNarha neeNdaba zeBhoduluko

Enquiries :
Telephone :
Reference :



Ms. Ashlea Strong
WSP Group Africa (Pty) Ltd
P O Box 98867
Bryanston
2152

Email: Ashlea.Strong@wsp.com

Dear Madam,

DRAFT SCOPING REPORT: ACTIVITIES ASSOCIATED WITH THE PROPOSED DALMANUTHA WIND ENERGY FACILITY ON VARIOUS PORTIONS OF THE FARMS BERG EN DAL 378 JT, VOGELSTRUISPOORT 384 JT, WAAIKRAAL 385 JT, LEEUWKLOOF 403 AND 404 JT, GELUK 405 JT, WELGEVONDEN 412 JT AND CAMELIA 467 JT, BELFAST, MPUMALANGA PROVINCE

The Department confirms having received the draft scoping report from you for the abovementioned project on 12 December 2022. After reviewing the report, this Department has the following comments:

1. The proposed Dalmanutha Wind Energy Facility is located in an area comprising a **high diversity of Red Listed Birds**, which as confirmed in the Scoping Report, use the full component of micro-habitats on the site.
2. The **Critically Endangered** Wattled Crane has been reported to be breeding on site, and there are reports of regular sitings of between one and four individuals within the proposed development footprint.
3. The risk of collision of **many threatened bird species** and Red Listed bats on wind turbines, and the risk of collision and electrocution of these species on the MV network is **high**, with the scoping report assigning a high significance rating before mitigation.
4. On 11 November 2022, the Minister of the Department of Forestry, Fisheries and the Environment gazetted her intent to establish protocols that provide the criteria for the specialist assessment and minimum report content requirements for determining impacts on Cape Vultures associated with the development of onshore wind energy generation facilities, which require environmental authorisation (Notice 2734, Government Gazette, 11 November 2022). The draft protocol prescribes a High to Very High Sensitivity to sites that are located within 50km of a Cape Vulture roost, colony and/or vulture restaurant, and **recommends abandoning proposals for wind energy in such areas**. According to the scoping report, a number of roosts have been identified **on the site**.
5. Shutdown-on-demand is not considered an appropriate means to mitigate the residual negative impacts associated with fatalities of large bodied birds that are listed as threatened.
6. The Scoping Report confirmed that mitigation to reduce or avoid turbine collisions is not possible through spatial avoidance (buffers), and it is our opinion that mitigation is not possible through shutdown-on demand or any other means. The potential loss of critically endangered species must therefore be regarded as a fatal flaw.



According to Regulation 22(b)(i), the competent authority must, within 43 days of receipt of a scoping report – refuse environmental authorisation if – the proposed activity is in conflict with a prohibition contained in legislation.

This Department recommends the refusal of the application in terms of 22(b)(i) on the following grounds:

- The Endangered Cape Vulture, Grey Crowned Crane and the **Critically Endangered** Wattled Crane, which are confirmed to occur on site (along with a host of Red Listed birds), will be impacted and even likely lost. Mitigation measures proposed to reduce the significance of this impact, which includes painting of blades or shutdown-on-demand, are not likely to result in avoidance of collisions. Since the outcome of such mitigation is unreliable, the potential loss of a critically endangered species must be regarded as a fatal flaw.
- This Department is therefore of the opinion that the proposed Dalmanutha Wind Energy Facility is not in line with the National Environmental Management Principle that requires that sustainable development must consider the application of a risk-averse and cautious approach that takes into account the limits of current knowledge about the consequences of decisions and actions.
- It is this Department's opinion that, based on the above points, the project is not in line with the National Environmental Management Principle that specifically requires that a development must be socially, environmentally and economically sustainable, as the disturbance of 'ecosystems' and loss of biological diversity cannot be avoided, minimized or remedied.

Please contact this office for any further enquiries.

[REDACTED]
DIRECTOR: ENVIRONMENTAL IMPACT MANAGEMENT

DATE: 02/02/2023

[REDACTED]
Department of Fisheries, Forestry and the Environment
[REDACTED]

Nadar, Thirushan

From: [REDACTED]
Sent: Wednesday, 01 February 2023 10:52
To: [REDACTED] Strong, Ashlea
Cc: [REDACTED] Nadar, Thirushan
Subject: Re: RE: 1/3/1/16/1N-347 Hendrina Green Hydrogen and Ammonia Facility Acknowledgement

Importance: High

Dear [REDACTED],

Thank you for this.

Just to confirm - the document submitted on 24 Nov 2022 was the draft report submitted to MDARDLEA for comment (as DFFE is the CA), in which case the reference number allocated by DARDLEA must change as it is not an application for authorisation.

Ashlea - I understand there to be significant concerns in terms impacts on endangered bird species associated with the Dalmanutha WEF project. Please can I request a link to the reports and I will work with Dineo on putting together our comment.

Kind Regards
[REDACTED]

[REDACTED]

*Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
Tel: 0 [REDACTED]
Email: [REDACTED]*

>>> "Strong, Ashlea" <Ashlea.Strong@wsp.com> 02/01/23 9:23 AM >>>
Dear [REDACTED]

Please find attached our reply to your original email.

Please note that DFFE is the Competent Authority for the Dalmanutha WEF project. The MDARDLEA will be the Competent Authority for the Dalmanutha West WEF project. This application will be submitted in May 2023.

Kind regards

Ashlea Strong
Principal Associate

T +27 11 361-1392

M +27 82 786-7819

-----Original Message-----

From: [REDACTED]

Sent: Wednesday, 01 February 2023 09:01

To: [REDACTED]

Cc: [REDACTED]

[REDACTED]hlea.Strong@wsp.com>

Subject: Fwd: 1/3/1/16/1N-347 Hendrina Green Hydrogen and Ammonia Facility Acknowledgement

Good morning [REDACTED]

Please see message below where I had inquired regarding the application form for Dalmanutha.

I have not received the from yet. I only have an application for Hendrina Green Hydrogen.

Regards
[REDACTED]

----- Forwarded message -----

From: [REDACTED]
Date: Thu, 15 Dec 2022 12:10:22 +0200
Subject: 1/3/1/16/1N-347 Hendrina Green Hydrogen and Ammonia Facility Acknowledgement
To: Ashlea.strong@wsp.com

Good morning Ms. Strong

Please find attached above-mentioned letters.

Please be advised that our offices have been experiencing numerous network connections and our network systems were down.

Please note that our office received a draft Scoping Report for Dalmanutha Wind Energy Facility dated 12/12/2022; I however have not received the application form for Dalmanutha. Is Dalmanutha the same project as Hendrina Green Hydrogen?

If different an application form is required. Documents received on the 24 November 2022 did not include an application form for Dalmanutha.

Kind Regards
[REDACTED]

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Nadar, Thirushan

From: [REDACTED]
Sent: Thursday, 02 February 2023 11:23
To: Nadar, Thirushan
Cc: [REDACTED]; Strong, Ashlea
Subject: RE: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Draft Scoping Report Review

Thank you Thirushan,

We will endeavour to have comments to you this week, if not today.

Kind Regards
Robyn
Dear [REDACTED]

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>>> "Nadar, Thirushan" <Thirushan.Nadar@wsp.com> 2023/02/01 11:25 >>>

I hope you are well.

In response to your mail (attached), please see the mail below for the links to the draft scoping report for the proposed Dalmanutha wind energy facility.

Although the commenting period does in fact close tomorrow (2 February 2023), we are happy to give MDARDLEA an extension to Monday 6 February CoB to submit the comments.

Kindly confirm that you can access the documents from the links below.

Kind regards



Thirushan Nadar
Consultant
T +27 11 300-6185
M +27 73 888-3727

From: Nadar, Thirushan
Sent: Monday, 12 December 2022 08:38
To: Nadar, Thirushan <Thirushan.Nadar@wsp.com>

Cc: Strong, Ashlea <Ashlea.Strong@wsp.com>; Sean Maphosa <Sean.Maphosa@enertrag.com>; Mmakoena Mmola <Mmakoena.Mmola@enertrag.com>

Subject: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Draft Scoping Report Review

Dear Commenting Authority,

PLEASE FIND ATTACHED NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY, MPUMALANGA

Notice is given in terms of:

- Regulation 41(2) of GNR 982 (as amended) published under section 24 and 24D of the National Environmental Management Act (No. 107 of 1998) (NEMA) for submission of an application for environmental authorisation (EA) in respect of activities identified in terms of GNR 983, GNR 984 and GNR 985 (as amended).
- Section 39 or 41(4) of the National Water Act (36 of 1998) (NWA), for the submission of a General Authorisation or Water Use Licence (WUL) Application (as applicable)

The Proponent, ENERTRAG South Africa (Pty) Ltd (ENERTRAG SA), under the Special Purpose Vehicles (SPVs) Dalmanutha Wind RF (Pty) Ltd and Dalmanutha West Wind RF (Pty) Ltd, proposes to develop the Dalmanutha Wind Energy Complex, comprising the Dalmanutha Wind Energy Facility and the Dalmanutha West Wind Energy Facility, near Belfast, in the Mpumalanga Province. The project falls within the jurisdiction of the Emakhazeni & Albert Luthuli Local Municipalities and the Nkangala & Gert Sibande District Municipalities.

The following farm portions are affected by the project:

- Berg-en-Dal 378 JT (Portions 1 and 9)
- Vogelstruispoort 384 JT (Portion 5 and 7)
- Waaikraal 385 JT (Portions 6, 7, 8, 10, 12,13 and 24)
- Leeuwkloof 403 JT (Portions 3 and 4)
- Leeuwkloof 404 JT (Portions 1 and 2)
- Geluk 405 JT (Portion 3)
- Welgevonden 412 JT (Portion 1)
- Camelia 467 JT (Portion 0)

WSP Group Africa (Pty) Ltd (WSP) has been appointed as the independent and suitably qualified EAP by ENERTRAG SA (Pty) Ltd, to manage and undertake the S&EIR Process. Parties wishing to formally register as stakeholders in order to offer their comment on the Proposed Projects are requested to forward their full contact details to the EAP at the details provided below. Registered stakeholders will be forwarded all future correspondence and notified individually of additional opportunities to participate in the process.

DRAFT SCOPING REPORT REVIEW PERIOD

The Draft Environmental Scoping Report has been made available for 30 days from **12 December 2022 to 02 February 2023** on the WSP website, a Datafree website, via One Drive Link for download and the following public places:

Area	Venue	Street Address
Belfast	Emakhazeni Local Municipality Belfast Office	1086 Scheeper St, Belfast, 1100
	eMakhazeni Public Library	25 Scheeper Street, Belfast, 1100
Carolina		
	Carolina Public Library	11 Voortrekker St, Carolina, 1048
OneDrive	<input type="checkbox"/> Dalmanutha Wind Energy facility Commenting Authority	
WSP Website	https://www.wsp.com/en-ZA/services/public-documents	
Datafree Website	https://wsp-engage.com/	

Please note that you will receive a separate email with the link to the one drive. This link will then request a verification number which will automatically be sent to your email address – if it doesn't seem to come through please check your "spam" folder.

WSP contact details are:

Name: Thirushan Nadar
Tel: +27 11 300-6185
Fax: 011 361 1381
E-mail: thirushan.nadar@wsp.com
Address: PO Box 98867, Sloane Park, 2152

Protection of Personal Information: WSP will be processing certain personal information about you as an interested and affected party (I&AP) for purposes of enabling your registration as an I&AP and storing of your details on our database, if you consent for us to do so. WSP will use these details to contact you about other relevant projects in the future. WSP will always process your personal information in accordance with the Protection of Personal Information Act 4 of 2013. You are entitled to exercise your rights as a data subject and let us know if you wish to be deregistered as an I & AP or if you no longer want your contact details to be included on our database.

We look forward to your participation in this process.

Kind regards



Thirushan Nadar
Consultant

T +27 11 300-6185
M +27 73 888-3727



WSP in Africa
Building 1, Golder House, Maxwell Office Park, Magwa Crescent West, Waterfall City, Midrand
South Africa

wsp.com

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-LAEmlHhHzdJzBITWfa4Hgs7pbKI

Nadar, Thirushan

From: [REDACTED]
Sent: Friday, 13 January 2023 12:05
To: Strong, Ashlea; Nadar, Thirushan
Subject: RE: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Draft Scoping Report Review

Good afternoon,

Thank you for the clarification. No payment is required as the application was submitted in 2022.

Please take of the payment requirements for all future applications.

Kind regards,

From: Strong, Ashlea <Ashlea.Strong@wsp.com>
Sent: 13 January 2023 12:02
To: [REDACTED] Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Subject: RE: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Draft Scoping Report Review
Importance: High

Dear Natasha

Thank you for your email – Please note that a SAHRIS Application was created and submitted on Monday, December 12, 2022 - CaseID: 20349.

We trust that as the case was submitted prior to 1 January 2023 that the Application Fee will not be required.

Kind regards



Ashlea Strong
Principal Associate
T +27 11 361-1392
M +27 82 786-7819

From: [REDACTED]
Sent: Friday, 13 January 2023 08:37
To: Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Cc: Strong, Ashlea <Ashlea.Strong@wsp.com>
Subject: RE: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Draft Scoping Report Review

Good day,

Please note that all development applications are processed via our online portal, the South African Heritage Resources Information System (SAHRIS) found at the following link: <http://sahra.org.za/sahris/>. We do not accept emailed, posted, hardcopy, faxed, website links or DropBox links as official submissions.

Please create **an application on SAHRIS** and upload all documents pertaining to the Environmental Authorisation Application Process. As per section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA), an assessment of heritage resources must form part of the process and the assessment must comply with section 38(3) of the NHRA. If a case already exists on SAHRIS regarding the development, please upload the documents to that case.

Once all documents including all appendices are uploaded to the case applications, please ensure that the status of the case is changed from DRAFT to SUBMITTED. Please ensure that all documents produced as part of the EA process are submitted as part of the application.

****PLEASE NOTE****

An application fee is now required for all section 38 applications. Please ensure that the SAHRIS application contains a proof of payment as per the notice at the following link: <https://sahris.sahra.org.za/content/what-are-sahra-processing-fees-and-banking-details>. A payment of R 2 000.00 for this application is required. Applications that do not include a proof of payment will be considered incomplete and will not be processed until proof of payment is provided.

From: [REDACTED]
Sent: 12 January 2023 18:39
To: [REDACTED]
Subject: FW: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Draft Scoping Report Review

From: Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Sent: Monday, 12 December 2022 08:38
To: Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Cc: Strong, Ashlea <Ashlea.Strong@wsp.com>; Sean Maphosa <Sean.Maphosa@enertrag.com>; Mmakoena Mmola <Mmakoena.Mmola@enertrag.com>
Subject: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Draft Scoping Report Review

Dear Commenting Authority,

PLEASE FIND ATTACHED NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY, MPUMALANGA

Notice is given in terms of:

- Regulation 41(2) of GNR 982 (as amended) published under section 24 and 24D of the National Environmental Management Act (No. 107 of 1998) (NEMA) for submission of an application for environmental authorisation (EA) in respect of activities identified in terms of GNR 983, GNR 984 and GNR 985 (as amended).
- Section 39 or 41(4) of the National Water Act (36 of 1998) (NWA), for the submission of a General Authorisation or Water Use Licence (WUL) Application (as applicable)

The Proponent, ENERTRAG South Africa (Pty) Ltd (ENERTRAG SA), under the Special Purpose Vehicles (SPVs) Dalmanutha Wind RF (Pty) Ltd and Dalmanutha West Wind RF (Pty) Ltd, proposes to develop the Dalmanutha Wind Energy Complex, comprising the Dalmanutha Wind Energy Facility and the Dalmanutha West Wind Energy Facility, near Belfast, in the Mpumalanga Province. The project falls within the jurisdiction of the Emakhazeni & Albert Luthuli Local Municipalities and the Nkangala & Gert Sibande District Municipalities.

The following farm portions are affected by the project:


- Berg-en-Dal 378 JT (Portions 1 and 9)

- Vogelstruispoort 384 JT (Portion 5 and 7)
- Waaikraal 385 JT (Portions 6, 7, 8, 10, 12,13 and 24)
- Leeuwkloof 403 JT (Portions 3 and 4)
- Leeuwkloof 404 JT (Portions 1 and 2)
- Geluk 405 JT (Portion 3)
- Welgevonden 412 JT (Portion 1)
- Camelia 467 JT (Portion 0)

WSP Group Africa (Pty) Ltd (WSP) has been appointed as the independent and suitably qualified EAP by ENERTRAG SA (Pty) Ltd, to manage and undertake the S&EIR Process. Parties wishing to formally register as stakeholders in order to offer their comment on the Proposed Projects are requested to forward their full contact details to the EAP at the details provided below. Registered stakeholders will be forwarded all future correspondence and notified individually of additional opportunities to participate in the process.

DRAFT SCOPING REPORT REVIEW PERIOD

The Draft Environmental Scoping Report has been made available for 30 days from **12 December 2022 to 02 February 2023** on the WSP website, a Datafree website, via One Drive Link for download and the following public places:

Area	Venue	Street Address
Belfast	Emakhazeni Local Municipality Belfast Office	1086 Scheeper St, Belfast, 1100
	eMakhazeni Public Library	25 Scheeper Street, Belfast, 1100
Carolina		
	Carolina Public Library	11 Voortrekker St, Carolina, 1048
OneDrive	 Dalmanutha Wind Energy facility Commenting Authority	
WSP Website	https://www.wsp.com/en-ZA/services/public-documents	
Datafree Website	https://wsp-engage.com/	

Please note that you will receive a separate email with the link to the one drive. This link will then request a verification number which will automatically be sent to your email address – if it doesn’t seem to come through please check your “spam” folder.

WSP contact details are:

Name: Thirushan Nadar
 Tel: +27 11 300-6185
 Fax: 011 361 1381
 E-mail: thirushan.nadar@wsp.com
 Address: PO Box 98867, Sloane Park, 2152

Protection of Personal Information: WSP will be processing certain personal information about you as an interested and affected party (I&AP) for purposes of enabling your registration as an I&AP and storing of your details on our database, if you consent for us to do so. WSP will use these details to contact you about other relevant projects in the future. WSP will always process your personal information in accordance with the Protection of Personal Information Act 4 of 2013. You are entitled to exercise your rights as a data subject and let us know if you wish to be deregistered as an I & AP or if you no longer want your contact details to be included on our database.

We look forward to your participation in this process.

Kind regards



Thirushan Nadar
Consultant

T +27 11 300-6185
M +27 73 888-3727



WSP in Africa
Building 1, Golder House, Maxwell Office Park, Magwa Crescent West, Waterfall City, Midrand
South Africa

wsp.com

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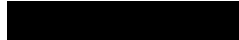
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WSP Group Africa (Pty) Ltd, Registered Office: Building C, Knightsbridge, 33 Sloane Street, Bryanston, 2191, South Africa Registered Number: 1999/008928/07 South Africa

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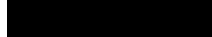


Heritage Officer: APM



T: [Redacted]
M: [Redacted]
E: [Redacted]
A: SAHRA, 111 Harrington Street, Cape Town, 8001,
Western Cape, ZA
www.sahra.org.za

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Heritage Officer: Archaeology, Palaeontology and
Meteorites Unit



T: [Redacted]
M: [Redacted]
E: [Redacted]
A: SAHRA, 111 Harrington Street, Cape Town, 8001,
Western Cape, ZA
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T: [REDACTED]
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A: SAHRA, 111 Harrington Street, Cape Town, 8001,
Western Cape, ZA
www.sahra.org.za

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Nadar, Thirushan

From: Nadar, Thirushan
Sent: Friday, 03 February 2023 08:12
To: [REDACTED]
Cc: Strong, Ashlea
Subject: RE: Dalmanutha Wind farm

Tracking:

[REDACTED]
[REDACTED]
[REDACTED]
Strong, Ashlea

Delivered: 2023/02/03 08:13

Read: 2023/02/03 08:13

Dear [REDACTED]

Thank you for your response and interest in the proposed Dalmanutha WEF project.

We have added your contact details on to our database for future correspondence regarding the project.

[REDACTED] thanks for forwarding the mail to us.

Kind regards



Thirushan Nadar
Consultant

T +27 11 300-6185
M +27 73 888-3727

From: [REDACTED]
Sent: Friday, 03 February 2023 07:20
To: [REDACTED]
Cc: Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Subject: RE: Dalmanutha Wind farm

Hi [REDACTED]

Thanks for contacting me, and for your valuable input on the birds and plants occurring in the area.

I am copying Thirushan Nadar from WSP, who I believe will be the right person to register you as an IAP. Thirushan will also share your mail with the botanist on the project

If you have coordinates for the wetland potentially housing White-winged Flufftail, the Seabird nest, and the Southern Bald Ibis breeding site please could you send these to me?

Kind regards

[REDACTED]
[REDACTED]
c: [REDACTED]
[REDACTED]

From: [REDACTED]

Sent: Thursday, 02 February 2023 16:58

To: [REDACTED]

Subject: Dalmanutha Wind farm

Hi [REDACTED]

[REDACTED] from Birdlife Africa send me your contact details.

I would like to register as a interested and affected party as I farm on Vogelstruispoort 384 JT portion 8.

I had contact with Birdlife Africa a few years back as I suspect that there were white winged flufftails on my property.

I photographed a breeding pair of secretary birds, that has been in the Dalmanutha area for years. I also kept track of a flock of bald ibisses that breed there. I also have evidence of blue crane, vultures and several raptors.

The area is extremely sensitive - I had a professional plant survey done and we found more than 200 indigenous plant species on less than 100 ha. This includes a few red data species - Gladiolus malvinus etc. The area is dotted with pans and even in the drier areas the plant species indicates the presence of wetlands.

Please contact me for more information or a site visit.

I think a wind farm will be detrimental to the area.

Kind regards

[REDACTED]

OFFICE OF THE CEO

Ref: LUA 22/3315

Unit: LUA/SS

Enquiries: [REDACTED]

Tel/ Fax: [REDACTED]

E-Mail: [REDACTED]

Ms. A. Strong
WSP Group Africa (PTY) Ltd
P.O. Box 98867
Sloane Park
BRYANSTONE
2152

E-mail: Ashlea.Strong@wsp.com

Dear Ms. Strong

SUBJECT: THE MTPA COMMENTS ON THE DRAFT EIR FOR THE PROPOSED DALMANUTHA WIND ENERGY FACILITY FOR THE ENERTRAG UNDER TWO SPECIAL PURPOSE VEHICLES (SPVs) – DALMANUTHA WIND RF (PTY)LTD AND DALMANUTHA WEST WIND RF INCLUDING THE GRID CONNECTION INFRASTRUCTURE FOR BOTH PROJECTS NEAR BELFAST IN MPUMALANGA PROVINCE. DFFE REF: TBC.

Your correspondence with WPS reference **41103722** of November 2022 refer.

The applicant proposes the development of a Dalmanutha Wind Energy Facility (WEF) under two Special Purpose Vehicles (SPV) that entails the Dalmanutha Wind Renewable Facility (RF) and Dalmanutha West Wind RF that will extend over an area that is approximately 9400 ha. The project entails the establishment of 70 wind turbines, each with a permanent hard standing area; the establishment of an internal gravel road, approximately 60km long and 6m wide, that will connect the wind turbines; development of buildings that will act as the Battery Energy Storage System (BESS) and maintenance facilities; a site substation; a temporary construction camp and laydown area as well as sewage and ablution facilities. The applicant will erect fencing around the development area of up to 4m high. The proposed directly impacted development footprint is approximately 400 ha. The Dalmanutha site was selected due to its proximity to Gumeni MTS located approximately 17.5 km from the proposed project site.

The MTPA has reviewed the application and objects to the proposed wind farm. However, our comments should be viewed in context to our approach on commenting on the renewable energy applications in the province, and the extreme sensitivity of the receiving area. The MTPA is committed to ensuring a just transition from coal fired coal power stations to green energy, however, we are mindful of the potential impacts of this largely 'new' technology within the province, particularly on species that are already as risk of extinction.

The MTPA is currently working with several the Independent Power Producers (IPP) that will be leasing land from Eskom for renewable energy projects. There are 17 projects and we don't foresee any fatal flaws at this stage of the assessment. Furthermore, the DFFE's Renewable Energy EIA Application database has 21 projects occurring in the province of which only 1 may have some impacts on biodiversity. WSP and Enertrag have also submitted 5

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applications to the MTPA wherein we have supported the development of the Camden 1 and 2 projects, even though there were some sensitivities. This context is important because the MTPA has until now not objected to any of the renewable energy applications. Unfortunately, the location of the proposed Dalmanutha Wind Energy Facility (DWEF) is in an area where the risk of collision with many threatened bird species is simply too great to be supported by us. The project is fatally flawed. We have sought counsel with Birdlife, Endangered Wildlife Trust, VulPro, bird specialists, and our local Department of Agriculture, Rural Development, Rural Development Land and Environmental Affairs (DARDLEA), and we are all in agreement that the location of the proposed DWEF should not be approved.

Before getting into the reasons for the objection, it is important to note that each pylon may be up to 200m high with a rotor blade 100m long. Although the standing area of the turbines may only be 4 ha in size, the area impacted by the blades will be a lot larger, in fact, the area covered by the blades (as a sphere) is around 418 ha (see Figure 1).



Figure 1 A 3D map drawn to scale in real world units that displays the proposed 70 wind turbines in transparent white, and the 7 sensitive ones that will be removed in reddish-orange. A 100m buffer is created around each wind turbine (based on the length of the rotor blades). The area impacted by the blades is an estimated 418 ha. From the map it is easier to visualise the proposed impact on a landscape with many threatened birds species, with some that are breeding/roosting.

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Reasons for our objection

There are several reasons for our objection, and many of which can be mitigated and perhaps offset, but there are handful of fatal flaws that we will mention below. We are a bit fortunate that several wind farms have been established in the Western and Eastern Cape and we can learn from these processes.

To pre-empt a response from the developer that these impacts can be mitigated, this is not always possible. We learnt this week from VulPro that two threatened vultures recently perished after colliding with a rotor blade at a wind farm in the Eastern Cape. This was with the mitigation measures in place. The risk of a single failure could have devastating impacts on some of the species we are concerned about. A 1km buffer is simply not adequate as birds are very mobile and the 100m long rotor blades are spinning and unseen and undetected by the birds (see Figures 1 and 3). If we consider what buffers are being proposed for some species, like the Cape Vulture, then research proposes a 50km buffer around frequently used roost sites. As far as we can tell, there is absolutely no scientific basis for the small buffers proposed as mitigation measures in the scoping report. Birds do not frequent small areas, they cover large areas and a more adequate buffer of 15-20 km would probably be a minimum for species threatened with extinction (in our opinion).

Avifaunal Sensitivity

Unlike areas that are no longer natural, that bird and bat species can avoid, a wind farm located in an important areas for birds, and as an important regional flyway, will be a death trap to the species moving through it. Mitigation measures may reduce the impacts, but they will still occur as has been observed in many of the current wind farms in South Africa. Even with mitigation, birds and bats do die. I do not believe we can afford to lose even a handful of individual birds based on the following.

Significant regional diversity and density of threatened bird species.

The MTPA has for over the last 25 years being managing a database of threatened species observations, which it uses in the development of its biodiversity sector plan and protected area expansion strategies. This database was queried to identify the number of species of conservation concern (threatened or rare) occurring within the DWEF footprint area, and we have a total of 71 observations for 19 species. Of these, 14 are bird species and 5 are plant species. These are presented in Table 1 and exclude those species identified by the specialists for this draft scoping report.

Many of the records in our database are based on collating observations from other scientists and research reports. This data is skewed towards areas which have been surveyed. In Figure 2, the map shows more records towards the north although we believe that if the same research effort was applied to the southern section, we would have a lot more observations for this area too as they are ecologically very similar.

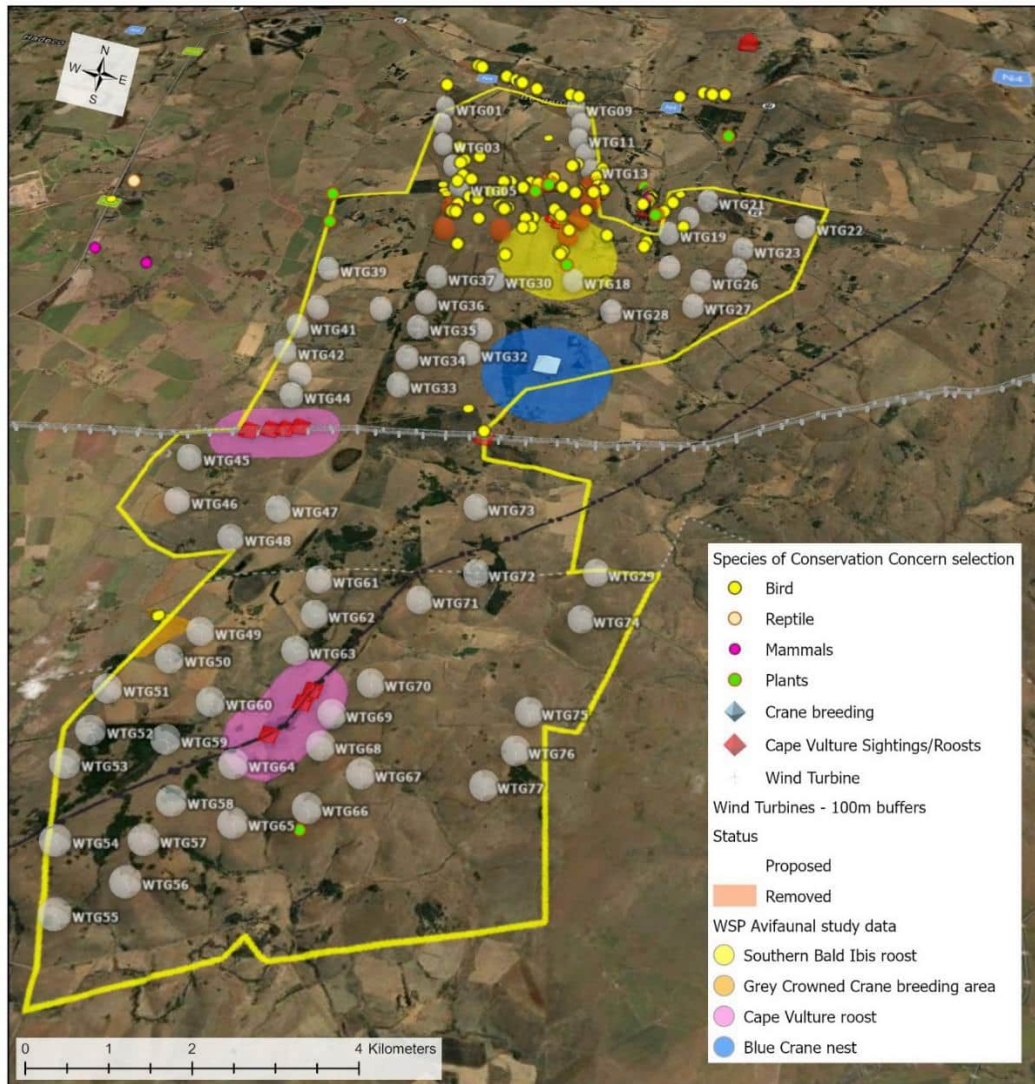


Figure 2: 3D map of the entire Dalmanutha Wind Energy Facility showing the location of the wind turbines, MTPA species data, and the species data collected by the avifaunal specialist on behalf of the developer.

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Table 1: List of species of conservation concern recorded within Dalmanutha Wind Energy Facility footprint area.

Taxonomic	Species	IUCN Status	Count of records
Bird	Wattled Crane	CR	17
Bird	Black-rumped Buttonquail	EN	1
Bird	Cape Vulture	EN	3
Bird	Grey Crowned Crane	EN	1
Bird	Blue Crane	VU	2
Bird	Bush Blackcap	VU	7
Bird	Denham's Bustard	VU	1
Bird	Secretary bird	VU	7
Bird	Southern Bald Ibis	VU	6
Bird	White-bellied Korhaan (Barrows Korhaan)	VU	10
Bird	Yellow-breasted Pipit	VU	1
Bird	Blue Korhaan	NT	2
Bird	Half-collared Kingfisher	NT	1
Bird	Pallid Harrier	NT	1
Plant	<i>Eulophia cooperi</i>	Rare	1
Plant	<i>Habenaria anguiceps</i>	Rare	1
Plant	<i>Habenaria humilior</i>	Rare	2
Plant	<i>Habenaria laevigata</i>	Rare	3
Plant	<i>Gladiolus malvinus</i>	VU	2

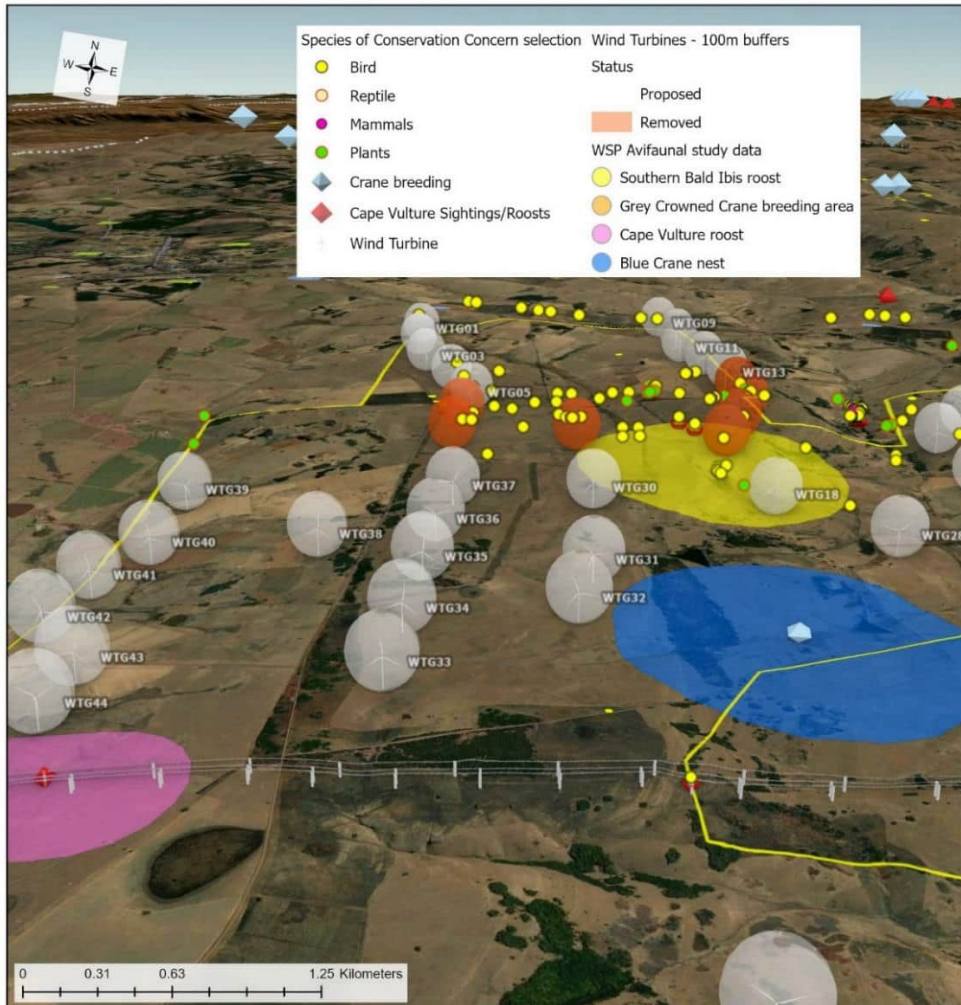


Figure 3: A close up 3D map of the northern section of the Dalmanutha Wind Energy Facility to better visualise the proximity of the species data to the wind turbines. The wind turbines were buffered by the distance of the rotor blades.

The occurrence of the following specific bird species of concern

The below sections highlights the occurrence of several bird species of conservation concern, where we feel that the proposed mitigation measures would be unable to protect these species from collisions.

Cape Vulture, *Gyps coprotheres*, Endangered.

Up to 100 individuals have been recorded on site at a time. The specialist report confirms that this species forages and roosts within footprint area (at least 43 roosting on the Eskom pylons). A local farmer even established a vulture restaurant to support the vultures. Wind farms are known to kill Cape Vultures and nationally Birdlife have developed guidelines for Cape Vultures and wind farms (Pfeiffer & Ralston-Paton 2018), and these recommend a 50km buffer around frequently used roosts.

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On the 11 November 2022, DFFE gazetted its intent establish protocols that provide the criteria for the specialist assessment and minimum report content requirements for determining impacts on Cape Vultures associated with the development of onshore wind energy generation facilities, which require environmental authorisation (Notice 2734, Government Gazette, 11 November 2022). The significance of some of these protocols, when gazetted, is that:

- The site sensitivity verification must be for a period not less than 12 months.
- The specialist undertaking the work must have demonstrated expertise in Cape Vulture observation and research.
- Vantage point monitoring must be by two people at the same time for a duration of at least 72 hours per vantage point for the 12 months. Vantage point monitoring is to determine the level of Cape Vulture flight activity on the site and the height of flight.
- Consultation with relevant non-governmental organisations with an interest in Cape Vulture protection including BirdLife South Africa, VulPro and the Endangered Wildlife Trust.

Where the significance rating for the Cape Vulture alone is *Very High* and *High*, then the area is potentially unsuitable for wind energy (as per protocol). There are several criteria proposed for an area to qualify as *Very High* to *High* significance, and one of these is if it is within 50 km of the proposed wind farm. As the frequently used roost is within the proposed wind farm, this criterion would be triggered and the sensitivity would be *Very High* to *High*. Application of the guidelines would then prohibit any wind farms within 50 km of the Cape Vulture roost.

The Cape Vulture protocol lists a bunch of other required documentation, such as monitoring plans, a Cape Vulture Specialist Assessment, compliance statements, etc..

White-backed Vulture, *Gyps africanus*, Critically Endangered.

Not resident but observed flying over area. We don't anticipate an impact on this species but it highlights the broader importance of this area and the likely occurrence of an important flyway for large bodied birds over this area.

Wattled Crane, *Grus carunculata*, Critically Endangered.

This **species alone is a fatal flaw for this project**, let alone all the numerous other sensitivities that we will mention. With the occurrence of between 1 and 4 individuals that are regularly seen within the footprint area, and that are reported to be breeding (according to farmer. but chicks have been observed by ornithologist), we cannot allow for a single adult bird to be lost due collision with a rotor blade from a wind farm. This species is Critically Endangered and the numbers of Wattle Crane are declining in the province and we **currently only have between 3 and 6 pairs of Wattled Crane** (EWT, pers com.). Therefore, we can afford to loose a single bird.

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In addition, the following Red data species too:

- Grey Crowned Crane, *Balearica regulorum*, **Endangered**. Breeding pair within footprint area.
- Black-rumped Buttonquail, *Turnix nanus*, **Endangered**. Several occurrences within footprint
- Blue Crane, *Anthropoides paradiseus*, **Vulnerable**. Several birds forage within footprint and with 1 nest on site.
- Southern Bald Ibis, *Geronticus calvus*, **Vulnerable**. Forages and roosts within footprint area. Up to 18 birds with 5 nesting birds in colony.
- Yellow-breasted Pipit, *Anthus chloris*, **Vulnerable**. Three pairs observed over a number of years.
- Denham's Bustard, *Neotis denhami*, **Vulnerable**. Large bodied bird that forages within footprint area.
- Secretary bird, *Sagittarius serpentarius*, **Vulnerable**. Occurs within footprint area across all seasons.
- White-bellied Korhaan, *Eupodotis senegalensis*, **Vulnerable**. Occurs within footprint area across all seasons.
- Lanner Falcon, *Falco biarmicus*, **Vulnerable**. Occurs within footprint area across all seasons.
- Blue Korhaan, *Eupodotis caerulescens*, **Near Threatened**. Observed within footprint area.
- Greater Flamingo, *Phoenicopterus ruber*, **Near Threatened**. Observed within footprint area.
- Lesser Flamingo, *Phoenicopterus minor*, **Near Threatened**. Probable (SABAP 2 data).

Located along important escarpment Flyway for Birds

Although we don't have data to substantiate it, the high escarpment area that runs from Dullstroom down to Wakkerstroom is in all likelihood a flyway used by large birds that move and forage, or migrate, over large distances. We require satellite-tracking devices fitted to more birds to confirm this, but if we consider all of our current foraging areas, limited bird tracking data, and observations for these large bodied birds, then this eastern escarpment area is certainly an area in all likelihood an important flyway. The DWEF is located in the centre of this flyway and the birds utilising this corridor may collide with the blades of the turbines.

Important Bird and Biodiversity Areas (IBBAS)

IBBAs are Birdlife's demarcated areas that are globally important for the conservation of bird populations on the basis of an internationally agreed set of criteria. It is very significant that the proposed DWEF occurs in part of the Steenkampsberg IBBA. The Avian Demography UNIT from the University of Cape Town also manages a handful of Coordinated Avifaunal Road counts (CAR) throughout some of the priority birding areas of the country and two of these occur within the proposed DWEF (see Figure 5-28 of draft scoping report). In addition, the Avian wind farm sensitivity map also highlights the significant sensitivity of the pentad in which the DWEF occurs (see Figure 5-29 of draft scoping report). Therefore, from a national and international planning point of view, the proposed DWEF is partly located with a significant priority area for birds and any kind of development that may kill significant numbers of adult birds over a number of years, should not be authorised here.

There are also numerous pans and wetlands within the study area that will attract bird species, such as the Flamingos that move between pans (see Figure 5-25 of draft scoping report). The African March Harrier will frequent the wetlands areas, together with some of the cranes. A 1km buffer from these areas are grossly inadequate.

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The DWEF, and the associated infrastructure, will have a direct impact on biodiversity in terms of land actually transformed from a natural to a transformed state. The draft Scoping report tries to address and mitigate these impacts. These impacts include impacts to our *Critical Biodiversity Areas Irreplaceable* sites (see Figure 4), however these can in part be addressed by the mitigation measures. However, it is the indirect and long-term indirect impacts from collisions with the blades on the avifaunal and bat diversity that is of most concern.

Wind Resource

The project site was selected based on proximity to grid, availability of land, and an acceptable wind resource (estimated 6 - 7 m/s). We are aware that the data source for these wind speed calculations is based on the interpolation of a number of very sparse weather stations that actually record wind speed (High-Resolution Wind Resource Map for South Africa 2020 March 2021). Most of the suitable stations are actually located in the southern half of South Africa. The values for Mpumalanga are also quite low when compared nationally, and it highlights the inherent uncertainty with a marginal wind resource that may result in the collision with many birds of conservation concern if approved.

No Project Alternative

It so reported that the “no project” alternative would be a missed opportunity to address the need for increases in renewable energy generation. We realise that but believe there are several other renewable energy applications trying to similarly address this need but that the risk to our vulnerable threatened bird and bat species is too grate to consider in this specific area. Perhaps the developer can consider alternative green energy solutions, such as hydrocarbons, for this area. However, a wind farm is not a suitable development model for this sensitive area.

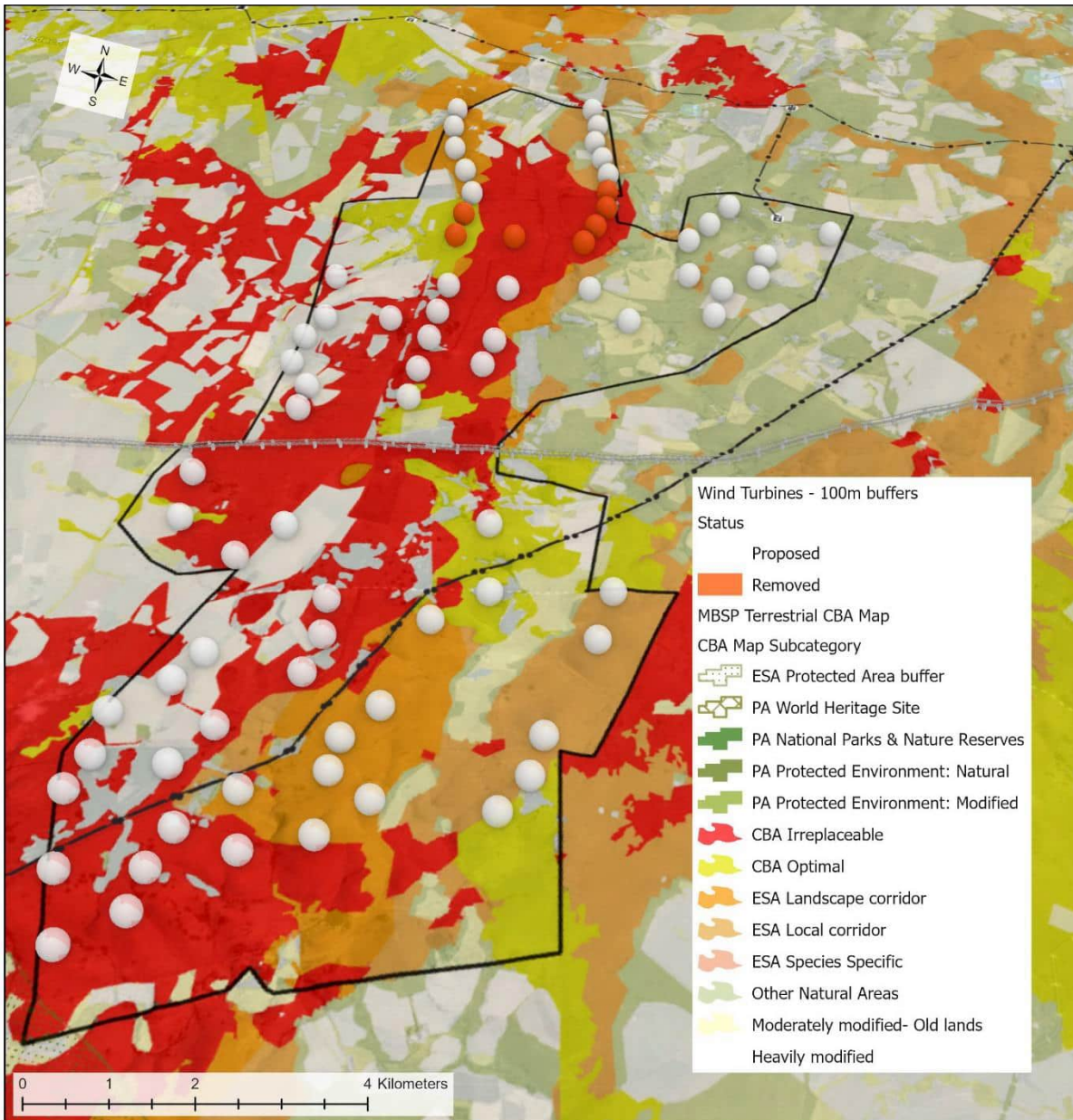


Figure 4: Map showing the *Critical Biodiversity Areas (CBA) Irreplaceable* areas, as well as other priority biodiversity areas within the proposed DWEF footprint area. The position of the wind turbines is indicated by means of spheres that represent a 100m buffer around each turbine (the length of the blades). The map is created using real world units so the scale is accurate.

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Terrestrial biodiversity assessment

The draft scoping report acknowledges the significant occurrence of *Critical Biodiversity Areas (CBA) Irreplaceable* within the footprint area (Figure 4). The scoping report also acknowledges that the majority of the infrastructure is also placed within the National Protected Area Expansion Areas (2016) terrestrial priority focus areas. Both the desktop and specialist survey acknowledge the High Sensitivity of the terrestrial biodiversity. This sensitivity supports the concern we have around the difficulties of trying to mitigate impacts on provincial and national biodiversity priority areas. It is impossible to mitigate impacts on the *CBA Irreplaceable* areas.

Errors or misleading information in the Draft Scoping report

We noted that the elevation map in Figure 5-9 and Figure 5-16, do not include a legend for elevation and that the elevation symbology collar ramp has been reversed. Therefore, the colours that usually represent high altitude areas now represent low altitude areas.

In Figure 5-21, there is reference to the priority focus areas of the National Protected Area Development Areas (2016). This is incorrect. It is in fact the National Protected Area **Expansion** Areas (2016).

Several species under the avifaunal section do not have the Latin names included. Some do, some do not, and a more consistent approach is requested.

In conclusion, we are very concerned about the proposed establishment of a wind farm, and if approved, the proposed wind farm will have devastating impact on the threatened bird species found within this area. Specialist study itself acknowledges that "*The proposed WEF will pose a collision risk to several priority species which could occur regularly at the site. Species exposed to this risk are large terrestrial species and occasional long-distance fliers i.e., bustards, cranes, flamingos, storks, Southern Bald Ibis and Secretary bird*". The evidence available is overwhelming; it confirms the occurrence of a very special, important, and vulnerable high-altitude grassland area that is supporting a number of threatened bird species throughout the year. This includes the Critically Endangered Wattled Crane where we only have between 3 and 6 pairs left in the province. The impact of losing a single bird could have national and global consequences for the survival of this species. Furthermore, the proposed mitigation measures are grossly inadequate and we feel strongly (convicted is perhaps a better word), that this application is fatally flawed due to its impacts on the avifauna. We advise the applicant to look into developing other forms of renewable energy or move the location of this proposed development much further away.

OFFICE OF THE CEO

Please do not hesitate to contact this office if there are any enquiries.

Regards,



ACTING CHIEF EXECUTIVE OFFICER

DATE: _____ / _____ / 2023

References

MTPA. 2014. *Mpumalanga Biodiversity Sector Plan Handbook*. Compiled by Lötter M.C., Cadman, M.J. and Lechmere-Oertel R.G. Mpumalanga Tourism & Parks Agency, Mbombela (Nelspruit).

Pfeiffer, M & Ralston-Paton, S. 2018. *Cape Vulture and Wind Farms. Guidelines for impact assessment, monitoring and mitigation*. BirdLife South Africa.

Nadar, Thirushan

From: Nadar, Thirushan
Sent: Wednesday, 22 February 2023 11:18
To: [REDACTED]
Cc: Mmakoena.Mmola@enertrag.com; Strong, Ashlea; Andrea.Gibb@enertrag.com; [REDACTED]
Subject: RE: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Final Scoping Report Review

Good afternoon [REDACTED]

Thank you for your response and interest in the project.

WSP can confirm that we have already registered your details on the project I&AP database for future communication upon receiving the initial mail from Jon Smallie.

Furthermore, WSP confirms that the information you have provided to us in your mail has been shared with the Avifaunal Specialist as well as the Biodiversity Specialist.

Kind regards



Thirushan Nadar
Consultant

T +27 11 300-6185
[REDACTED]

From: [REDACTED]
Sent: Sunday, 19 February 2023 18:06
To: Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Cc: Mmakoena.Mmola@enertrag.com; Strong, Ashlea <Ashlea.Strong@wsp.com>; Andrea.Gibb@enertrag.com; [REDACTED]
Subject: Re: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Final Scoping Report Review

Good day Thirushan

My email to [REDACTED] (3 February 2023) refers:

I would like to register as an Interested and Affected Party for the proposed Dalmanutha Wind Farm.

My family has been farming in the area for over 150 years and we are well acquainted with this sensitive region's ecology.

My concerns re the project:

*I have documented – anecdotal and with photographs -the movements of a breeding pair of **secretary birds** on the following properties.

Waaikraal 385 JT

Vogelstruispoort 384 JT

Berg-en-Dal 378 JT

They have been seen in the area for decades.

*I also followed a flock of **Bald Ibisses** on the abovementioned properties. They were known to roost and breed on Waaikraal 385 JT. As they roam over a large area it is pointless to protect only a small, fragmented piece of land.

*It is suspected that the critically endangered Whitewing flufftail may utilize the several pans, wetlands and rivulets as a breeding site.

* We photographed a vulture on a telephone pole on Vogelstruispoort 384 JT as well as storks.

* Blue crane birds is known to roam the area.

* A professional plant species survey done by a registered EAP yielded more than 220 indigenous plant species, on a 100ha portion of Vogelstruispoort 384 JT. This includes the endangered Gladiolus Malvinus of which there are apparently

only 6 known sites where they occur – all in the Dullstroom/Emakazeni (Belfast) area.

* The biome included in the project area is known as the most flora diverse area in South-Africa. We can therefore compare the Dalmanutha's Wind Farm project Plant Specie Report to this one, to ensure **scientific integrity**.

* Gladiolus malvinus can only be positively identified in the flowering season.

* The proposed project falls in a major water divide and critical important catchment area where surface water seems abundant, but groundwater is actually scarce and both need the utmost protection. Because of the high altitude and the prevalence of the watershed no disturbance or pollution can be tolerated.

* What percentage of the energy generated will be at the disposal of the coal mine sector? According to media reports this is the actual purpose of the development.

* What impact will the turbulence created by the giant turbines have on precipitation as the site represents the edge of the escarpment and mist belt?

A negative impact on the aforementioned will lead to reduced moisture inflow from the Indian Ocean which in turn will impact on this critical catchment. (fauna, flora, agriculture as well as drinking water).

The location of the proposed site is situated on the water shed at an extremely high altitude – a negative impact will affect water flowing to the Gauteng and the Lowveld.

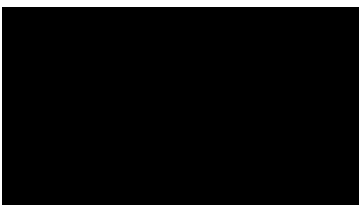
* Which companies are involved in the project – holding companies etc?

In the light of the current energy crisis South-Africans has the right to know who benefits from projects like this and what the ecological long-term price will be.

- The Mpumalanga Highveld has largely been destroyed by mining – in this area the MASSIVE Umsimbithi, Xevono and Belfast etc mines. VERY little pristine land or even farmland is left. As the project area is largely undeveloped it deserves the best protection – while we still have time left not to steal from the future.

I reserve the liberty to share my comments with the media as and when required as this a matter of national importance.

Kind Regards



On Mon, Feb 13, 2023 at 2:26 PM Nadar, Thirushan <Thirushan.Nadar@wsp.com> wrote:

Dear Landowner,

NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY, MPUMALANGA

Notice is given in terms of:

- Regulation 41(2) of GNR 982 (as amended) published under section 24 and 24D of the National Environmental Management Act (No. 107 of 1998) (NEMA) for submission of an application for environmental authorisation (EA) in respect of activities identified in terms of GNR 983, GNR 984 and GNR 985 (as amended).
- Section 39 or 41(4) of the National Water Act (36 of 1998) (NWA), for the submission of a General Authorisation or Water Use Licence (WUL) Application (as applicable)

The Proponent, ENERTRAG South Africa (Pty) Ltd (ENERTRAG SA), under the Special Purpose Vehicles (SPVs) Dalmanutha Wind RF (Pty) Ltd and Dalmanutha West Wind RF (Pty) Ltd, proposes to develop the Dalmanutha Wind Energy Complex, comprising the Dalmanutha Wind Energy Facility and the Dalmanutha West Wind Energy Facility, near Belfast, in the Mpumalanga Province. The project falls within the jurisdiction of the Emakhazeni & Albert Luthuli Local Municipalities and the Nkangala & Gert Sibande District Municipalities.

The following farm portions are affected by the project:

- Berg-en-Dal 378 JT (Portions 1 and 9)
- Vogelstruispoort 384 JT (Portion 5 and 7)
- Waaikraal 385 JT (Portions 6, 7, 8, 10, 12,13 and 24)
- Leeuwkloof 403 JT (Portions 3 and 4)
- Leeuwkloof 404 JT (Portions 1 and 2)
- Geluk 405 JT (Portion 3)
- Welgevonden 412 JT (Portion 1)
- Camelia 467 JT (Portion 0)

WSP Group Africa (Pty) Ltd (WSP) has been appointed as the independent and suitably qualified EAP by ENERTRAG SA (Pty) Ltd, to manage and undertake the S&EIR Process. Parties wishing to formally register as stakeholders in order to offer their comment on the Proposed Projects are requested to forward their full contact details to the EAP at the details provided below. Registered stakeholders will be forwarded all future correspondence and notified individually of additional opportunities to participate in the process.

FINAL SCOPING REPORT REVIEW PERIOD

The Final Environmental Scoping Report has been Submitted to the Department on 10 February 2023 and made available on the WSP website, a Data free website, via One Drive Link for download:

WSP Website	https://www.wsp.com/en-ZA/services/public-documents
Datafree Website	https://wsp-engage.com/
OneDrive	 Landowners

WSP contact details are:

Name: Thirushan Nadar
 Tel: +27 11 300-6185
 Fax: 011 361 1381
 E-mail: thirushan.nadar@wsp.com
 Address: PO Box 98867, Sloane Park, 2152

Protection of Personal Information: WSP will be processing certain personal information about you as an interested and affected party (I&AP) for purposes of enabling your registration as an I&AP and storing of your details on our database, if you consent for us to do so. WSP will use these details to contact you about other relevant projects in the future. WSP will always process your personal information in accordance with the Protection of Personal Information Act 4 of 2013. You are entitled to exercise your rights as a data subject and let us know if you wish to be deregistered as an I & AP or if you no longer want your contact details to be included on our database.

We look forward to your participation in this process.

Kind regards



Thirushan Nadar
 Consultant

T +27 11 300-6185




WSP in Africa
 Building 1, Maxwell Office Park, Magwa Crescent West, Waterfall City, Midrand
 1685 South Africa

wsp.com

WSP is a proud Level 1 B-BBEE contributor and is internationally certified for ISO 9001, 14001 & 45001

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WSP Group Africa (Pty) Ltd, Registered Office: Building 1, Maxwell Office Park, Magwa Crescent West, Waterfall City, Midrand, Gauteng, 1685, South Africa Registered Number: 1999/008928/07 South Africa

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-LAEmHhHzdJzBITWfa4Hgs7pbKI

Nadar, Thirushan

From: Nadar, Thirushan
Sent: Tuesday, 14 February 2023 08:44
To: [REDACTED] Ashlea; Mmakoena Mmola; [REDACTED]
Subject: RE: Draft Scoping Report for the Proposed Dalmanutha Wind Energy Facility

Dear Sam,

Thank you for the response to the Final scoping report.

We will notify the Biodiversity specialist accordingly of the links you have provided.

Lastly, we will arrange a meeting with Bird Life SA and MTPA to chat about these concerns.

Kind regards



Thirushan Nadar
Consultant

T +27 11 300-6185
[REDACTED]

From: [REDACTED]

Subject: Re: Draft Scoping Report for the Proposed Dalmanutha Wind Energy Facility

Dear Thirushan

Many thanks for the responses to our submission on the draft Scoping Report.

With regards to the conservation status of the affected ecosystems, please refer to the following links:

<http://bgis.sanbi.org/Projects/Detail/1233/>

<http://bgis.sanbi.org/ecosystems/home>

https://www.dffe.gov.za/sites/default/files/gazetted_notices/nema_threatenedecosystemslist_g47526gon2747.pdf

We suggest that the biodiversity specialist should engage with SANBI or MPTA if further clarity is required.

BirdLife South Africa would welcome the opportunity to engage with WSP, and the avifaunal and biodiversity specialists *before* the draft EIA report is completed. We have concerns about the scope of data collection, as well as regarding appropriateness and feasibility of biodiversity offsets in this context. It might be helpful to include the MPTA in these discussions as well, to help ensure everyone is on the same page.

Kind regards
[REDACTED]



[REDACTED]
Birds and Renewable Energy Project Manager



Giving Conservation Wings

Private Bag X16, Pinegowrie 2123, Johannesburg, Gauteng, South Africa

Cell: +27 (0) 83 673 3948

E-mail: energy@birdlife.org.za

<http://www.birdlife.org.za>



BirdLife South Africa's Birds and Renewable Energy Project is sponsored by Investec Corporate and Institutional Banking

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From: Nadar, Thirushan <Thirushan.Nadar@wsp.com>

Date: Monday, 13 February 2023 at 14:38

To: [REDACTED]

Cc: [REDACTED]

makoena.Mmola@enertrag.com>

Subject: RE: Draft Scoping Report for the Proposed Dalmanutha Wind Energy Facility

Dear Samantha,

Please see attached the official response letter to Bird Life SA's comments.

Kind regards



Thirushan Nadar
Consultant

T +27 11 300 6185
[Redacted]

From: [Redacted]
Sent: Thursday, 26 January 2023 16:27
To: Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Cc: [Redacted]
Subject: Draft Scoping Report for the Proposed Dalmanutha Wind Energy Facility

Dear Thirushan

Please see our comments attached comments on the draft Scoping Report for the proposed Dalmanutha Wind Energy Facility.

Kind regards
[Redacted]



[Redacted]
Birds and Renewable Energy Project Manager



Giving Conservation Wings

Private Bag X16, Pinetown 2123, Johannesburg, Gauteng, South Africa
Cell: +27 (0) 83 673 3948
E-mail: energy@birdlife.org.za
<http://www.birdlife.org.za>



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-LAEmHhHzdJzBITWfa4Hgs7pbKI

Nadar, Thirushan

From: [REDACTED]
Sent: Monday, 13 February 2023 16:48
To: Strong, Ashlea; Nadar, Thirushan; Mmakoena Mmola; Andrea Gibb
Cc: Trisha Rene Pillay; EIAAdmin; Salome Mambane
Subject: 14/12/16/3/3/2/2243

Dear Sir/Madam

ACKNOWLEDGEMENT OF RECEIPT OF THE FINAL SCOPING REPORT AND AMENDED APPLICATION FORM FOR THE PROPOSED DALMANUTHA WIND ENERGY FACILITY (WEF) AND ASSOCIATED INFRASTRUCTURE, NEAR BELFAST MPUMALANGA PROVINCE.

The Department confirms having received the Final Scoping Report and Amended Application Form for the abovementioned project on 10 February 2023. You have submitted these documents to comply with the National Environmental Management Act, 1998 (Act No. 107 of 1998) and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.

You are hereby reminded of Section 24F of the National Environmental Management Act 1998 (Act No. 107 of 1998), as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Kind Regards,

[REDACTED]
Integrated Environmental Authorisations:
Priority Infrastructure Developments

[REDACTED]
To God be the Glory!!!



Private Bag X08
Wierda Park
0149
13 December 2022

Attention: Thirushan Nadar (WSP group)

Dear Thirushan and colleagues

Company name: WSP group

Address: Building 1, Maxwell Office Park, Magwa Crescent West, Waterfall City, Midrand
1685 South Africa

Contact details: Thirushan.Nadar@wsp.com; Ashlea.Strong@wsp.com; andrea.gibb@enertrag.com;
Mmakoena.Mmola@enertrag.com

Response to the Proposal from the Proponent, ENERTRAG South Africa (Pty) Ltd (ENERTRAG SA), under the Special Purpose Vehicles (SPVs) Dalmanutha Wind RF (Pty) Ltd and Dalmanutha West Wind RF (Pty) Ltd, proposes to develop the Dalmanutha Wind Energy Complex, comprising the Dalmanutha Wind Energy Facility and the Dalmanutha West Wind Energy Facility, near Belfast, in the Mpumalanga Province.

DFFE reference number....

The Endangered Wildlife Trust (EWT) is a non-governmental, non-profit, conservation organisation, founded in 1973 and operating throughout southern Africa. The EWT conserves threatened species and ecosystems in southern Africa by implementing research and conservation action towards mitigating threats facing species diversity and supporting sustainable natural resource management. The EWT furthermore communicates the principles of sustainable living through awareness programmes to the broadest possible constituency for the benefit of the region. The EWT is driven by a team of passionate and dedicated conservationists working through 13 specialised programmes across southern and East Africa, each falling under one of our three key strategic pillars: **Saving species**, **conserving habitats**, and **benefitting people**.

While the [EWT supports the just transition to renewable energy](#), these proposed developments are only considered feasible if they follow the mitigation hierarchy and the species environmental assessment guideline and avoid unnecessary and unsustainable environmental impacts. We further support [wind energy](#) but only where all possible options for avoiding, reducing, minimising, and offsetting of impacts (in that order) have been considered and implemented. Please refer to the links embedded in this paragraph for further insight into the EWT's perspectives, concerns, and considerations linked to renewable energy in general, and wind energy in particular.

Physical Address: Plot 27 and 28 Austin Road, Glen Austin AH, Midrand, 1685
Gauteng, South Africa

Postal Address: Postnet Suite # 027, Postnet Suite 002, Private Bag X08, Wierda Park 0149
Gauteng, South Africa

Tel: [REDACTED] **Email:** ewt@ewt.org.za **Web:** www.ewt.org.za

The Endangered Wildlife Trust is a non-profit, public benefit organisation dedicated to conserving species and ecosystems in southern Africa to the benefit of all people.

NPO Number: 015-502, **PBO number:** 930 001 777, **Member of IUCN** - The International Union for Conservation of Nature



The demand for energy is increasing globally and Wind Energy Facilities (WEFs) are considered a viable option for renewable energy production. There are, however, concerns over the impacts of wind farms on wildlife in three key aspects: the disturbance or displacement of species from their habitats due to the construction of the associated WEF infrastructure; bird and bat collisions with turbine blades; and collisions and electrocutions on energy infrastructure associated with WEFs. This concern is compounded by the potential cumulative impacts of ongoing wind energy developments posing a direct risk to collision-prone species across sensitive areas, and an amplified level of disturbance and loss of habitat for wildlife in areas that overlap with WEFs.

The EWT believes that some of the impacts of WEFs can be avoided and reduced using suitable remedial actions and mitigation measures. Accordingly, we recommend four priority measures that must be considered and implemented to ensure minimum impact of wind energy on wildlife, for details of these four priority measures click [here](#).

The [National Web-based Environmental Screening Tool](#) is a geographically based web-enabled application that allows a proponent intending to submit an application for environmental authorisation in terms of the Environmental Impact Assessment (EIA) Regulations 2014, as amended, to screen their proposed site for any environmental sensitivity. Based on the proposed footprint of **Dalmanutha Wind Energy Facility**, a number of high sensitivity species have been highlighted as potentially occurring in the proposed development area. Of these there are a number that are serious concern in terms of potential collision risk, these include *Geronticus calvus*, *Eupodotis senegalensis*, *Circus ranivorus*, *Neotis denhami*, *Grus carunculata* and *Balearica regulorum*. Of these the Korhaan, Bustard and Cranes are the highest concern. See screening report attached for other sensitivities.

In evaluating the above application, we wish to highlight the following impacts and resultant recommendations:

Avifaunal Impacts:

- We highly recommend a shut down on demand system is implemented, either through on the ground observers, or automated systems, to shut down turbines when collision prone birds enter wind farms and are heading within rotor sweep zones.
- Although the power line design will minimise bird electrocution incidents due to satisfactory phase clearances, collisions with shield wires or conductors are still likely to occur. With regards to the transmission lines fitting Bird Flight Diverters (BFDs) may mitigate collisions involving large raptors but it will not mitigate (at all) collisions by Denham's Bustard and the two relevant crane species. Due to the fact that lines are likely to be handed over to Eskom

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Gauteng, South Africa

Postal Address: Postnet Suite # 027, Postnet Suite 002, Private Bag X08, Wierda Park 0149
Gauteng, South Africa

Tel: + [REDACTED] **Email:** ewt@ewt.org.za **Web:** www.ewt.org.za

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NPO Number: 015-502, **PBO number:** 930 001 777, **Member of IUCN** - The International Union for Conservation of Nature



(for long term management as per standard power purchase agreements), they need to be constructed to specification as determined by Eskom and fitted with approved BDFs at the Eskom recommended intervals.

- New power lines need to be placed, as far as possible, in areas where linear infrastructure already exists and ideally as close to the existing lines as possible.
- Should new, more effective BDFs come available the developer needs to be ready to procure and fit these. The EWT is in the process of expanding its current long-term line marking experiment near De Aar where a further 4 BDF designs will be tested, specifically to reduce Ludwig's Bustard collisions. If this development proceeds, we urge the developer to contact the EWT Wildlife and Energy programme directly and to participate in this important and ongoing research. In the event that a more effective BDF is identified and approved, this must be applied to the line. Possibly including the replacement of old BDFs where possible.
- Lines need to be seasonally monitored (according to the ESKOM/EWT partnership protocol) for fatalities and these fatalities should be reported to the Eskom/EWT Strategic partnership.
- While the turbine design has not yet been finalised, we recommend that minimum blade tip height be set as high as is possible (even more than the 25 m recommended).

Bat collision risk:

Bats are particularly susceptible to anthropogenic changes because of their low reproductive rate, longevity, and high metabolic rates, limiting their ability to recover from declines and to maintain sustainable populations. Bat fatalities due to wind turbines raise serious concerns about population-level impacts. The main documented direct impacts of wind energy on bats includes fatality via mainly direct collision with turbine blades or less likely by barotrauma. Indirect impacts include roost disturbances and/or destruction (if construction, operational or decommissioning activities occur close to bat roosts), destruction of foraging habitat (due to WEF construction and habitat change), displacement of bats from their foraging habitat (bats avoid the WEF area) and obstruction of movement paths to drinking, foraging, roosting and migration sites.

Impacts of wind turbines on bats vary depending on site selection, specifications of the wind turbines, species occurring in the area, season and time of night. Bat fatalities may outnumber bird fatalities by 10:1 and fatality rates may be affected by turbine size and wind speed (low-wind nights are generally associated with increased fatality). Until we have a better understanding of South African bat population levels and fluxes, bat ecology and migration, it is recommended that a precautionary approach is adopted, and all known bat data are carefully considered. For detailed pre-construction monitoring, operational phase monitoring and mitigation guidelines please click [here](#).

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Tel: [REDACTED] **mail:** ewt@ewt.org.za **Web:** www.ewt.org.za

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General recommendations:

- We further recommend a comprehensive, long-term avifaunal and terrestrial monitoring programme be implemented by an independent qualified service provider (see guidelines in appendix 1). Little is known about terrestrial impacts of large wind developments and as such this project, if approved, will provide an opportunity to measure baselines and changes over time for terrestrial species.
- Avifaunal impacts need to be closely monitored with seasonal line surveys and surveys in the vicinity of turbines.
- The developments will constitute an additional pressure on biodiversity in the area. This runs against the purpose of the conservancies and formal protected areas in the region, that have taken many years of conservation investment to get off the ground. Therefore, the EWT would like to see a commitment to conservation from the developer. A variety of options are available and the developer is welcome to contact the EWT to discuss these.
- Significant adverse impacts can be expected during the construction phase including vehicular collisions with wildlife, collection and cutting of shrubs for firewood, potential snaring, pollution, etc., and as such strict controls and protocols are required during this phase.
- We strongly advise the appointment of an independent consultant to monitor activities during the construction phase and to report issues and non-compliance to the authorities and developer.
- There is seldom evidence of sufficiently robust implementation of the mitigation hierarchy in the process of site selection. Avoidance, which is the first and most important step, must be duly considered as the first priority. In this instance we do not see sufficient evidence that alternative site options have been duly considered given the presence of sensitive species at this locality. Based on this this we should **NOT** be considering minimization, mitigation or offset options as the first step of the mitigation hierarchy has not yet been comprehensively addressed.

In summary, based on the information provided, we are **in-principle opposed** to the placement of the wind farm as proposed **based on the likely direct impacts to species of conservation concern and insufficient consideration for viable alternatives.**

The EWT appreciates the opportunity provided by the developer to comment and we look forward to the opportunity to participate in the process of informing the responsible placement of turbines or alternatively avoidance if no environmentally responsible options are available. We would value the opportunity to provide our detailed landscape planning data and to assist through negotiation to inform decision making, but we cannot support high-risk options. We further request that the relevant competent authority and Department of Forestry, Fisheries, and the Environment (DFFE) need to take these concerns into consideration, including the associated powerlines and other infrastructure that will be required as a result of the proposed wind energy development.

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Tel: [REDACTED] **Email:** ewt@ewt.org.za **Web:** www.ewt.org.za

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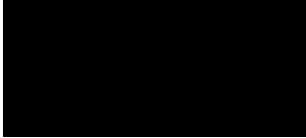


**ENDANGERED
WILDLIFE TRUST**
Protecting forever, together.



The EWT reserves the right to revise initial comments presented here, if additional information becomes available.

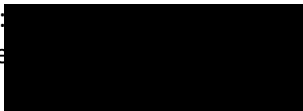
Regards,



Endangered Wildlife Trust

Email:

Phone:



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NPO Number: 015-502, **PBO number:** 930 001 777, **Member of IUCN** - The International Union for Conservation of Nature

Nadar, Thirushan

From: Nadar, Thirushan
Sent: Wednesday, 22 February 2023 11:13
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Dalmanutha WEF

Tracking: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Dear Ian ,

Thank you for your comments and participation on the project.

WSP can confirm that your details have been added on to the project I&AP database for future communication.

Kind regards



Thirushan Nadar
Consultant

T +27 11 300-6185
[REDACTED]

From: [REDACTED]
Sent: Wednesday, 22 February 2023 10:50
To: Nadar, Thirushan <Thirushan.Nadar@wsp.com>; Strong, Ashlea <Ashlea.Strong@wsp.com>; andrea.gibb@enertrag.com; Mmakoena.Mmola@enertrag.com
Cc: [REDACTED]
Subject: Dalmanutha WEF

Dear Thirushan Nadar

Please find attached comments and concerns about the proposed Dalmanutha WEF.

Please do register us an I&AP.

Thank you and all the best,

Regards
A handwritten signature in black ink, appearing to read 'Ashlea Strong', with a decorative flourish of small black dots trailing off to the right.

[REDACTED]

[REDACTED] il lif st

[REDACTED]



Broad-Based Black Economic Empowerment – BBBEE Level 4 Certificate & 95% Civil Society Organisation
PBO number: 930 001 777
NPO number: 015-502 NPO
IT number: IT 6247

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Postnet Suite # 027, Postnet Suite 002, Private Bag X08, Wierda Park 0149, Gauteng, South Africa



"We all have one universal and inherent commonality and that is the turmoil and joy of being human." ([REDACTED], 2012)

Nadar, Thirushan

From: Nadar, Thirushan
Sent: Tuesday, 14 February 2023 08:50
To: [REDACTED]
Cc: Strong, Ashlea; 'andrea.gibb@enertrag.com'; 'Mmakoena Mmola'
Subject: RE: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Final Scoping Report Review

Dear [REDACTED]

Thank you for your response.

However, please note that this project has already been advertised in the Middelburg Observer on the 9 December 2022.

Kind regards



Thirushan Nadar
Consultant



[REDACTED] ver.co.za

Sent: Monday, 13 February 2023 15:49
To: Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Cc: Strong, Ashlea <Ashlea.Strong@wsp.com>; 'andrea.gibb@enertrag.com' <Andrea.Gibb@enertrag.com>; 'Mmakoena Mmola' <Mmakoena.Mmola@enertrag.com>
Subject: RE: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Final Scoping Report Review

Good day Nadar

Thank you for your email.

Could you please let me know in which newspaper you would like to advertise? As I can help you in all the Caxton Newspapers in Mpumalanga.

Kind Regards

[REDACTED]
Sales Representative
MIDDELBURG OBSERVER



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From: Nadar, Thirushan [<mailto:Thirushan.Nadar@wsp.com>]
Sent: Monday, 13 February 2023 14:30
To: Nadar, Thirushan
Cc: Strong, Ashlea; andrea.gibb@enertrag.com; Mmakoena Mmola
Subject: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Final Scoping Report Review

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Dear Stakeholder,

NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY, MPUMALANGA

Notice is given in terms of:

- Regulation 41(2) of GNR 982 (as amended) published under section 24 and 24D of the National Environmental Management Act (No. 107 of 1998) (NEMA) for submission of an application for environmental authorisation (EA) in respect of activities identified in terms of GNR 983, GNR 984 and GNR 985 (as amended).
- Section 39 or 41(4) of the National Water Act (36 of 1998) (NWA), for the submission of a General Authorisation or Water Use Licence (WUL) Application (as applicable)

The Proponent, ENERTRAG South Africa (Pty) Ltd (ENERTRAG SA), under the Special Purpose Vehicles (SPVs) Dalmanutha Wind RF (Pty) Ltd and Dalmanutha West Wind RF (Pty) Ltd, proposes to develop the Dalmanutha Wind Energy Complex, comprising the Dalmanutha Wind Energy Facility and the Dalmanutha West Wind Energy Facility, near Belfast, in the Mpumalanga Province. The project falls within the jurisdiction of the Emakhazeni & Albert Luthuli Local Municipalities and the Nkangala & Gert Sibande District Municipalities.


The following farm portions are affected by the project:

- Berg-en-Dal 378 JT (Portions 1 and 9)
- Vogelstruispoort 384 JT (Portion 5 and 7)
- Waaikraal 385 JT (Portions 6, 7, 8, 10, 12,13 and 24)
- Leeuwkloof 403 JT (Portions 3 and 4)
- Leeuwkloof 404 JT (Portions 1 and 2)
- Geluk 405 JT (Portion 3)
- Welgevonden 412 JT (Portion 1)
- Camelia 467 JT (Portion 0)

WSP Group Africa (Pty) Ltd (WSP) has been appointed as the independent and suitably qualified EAP by ENERTRAG SA (Pty) Ltd, to manage and undertake the S&EIR Process. Parties wishing to formally register as stakeholders in order to offer their comment on the Proposed Projects are requested to forward their full contact details to the EAP at the details provided below. Registered stakeholders will be forwarded all future correspondence and notified individually of additional opportunities to participate in the process.

FINAL SCOPING REPORT REVIEW PERIOD

The Final Environmental Scoping Report has been Submitted to the Department on the 10 February 2023 and made available on the WSP website, a Data free website, via One Drive Link for download:

WSP Website	https://www.wsp.com/en-ZA/services/public-documents
Datafree Website	https://wsp-engage.com/
OneDrive	 Stakeholders

WSP contact details are:

Name: Thirushan Nadar
Tel: +27 11 300-6185
Fax: 011 361 1381
E-mail: thirushan.nadar@wsp.com
Address: PO Box 98867, Sloane Park, 2152

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We look forward to your participation in this process.

Kind regards



Thirushan Nadar
Consultant

T +27 11 300-6185
[Redacted]



WSP in Africa
Building 1, Maxwell Office Park, Magwa Crescent West, Waterfall City, Midrand
1685 South Africa

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Nadar, Thirushan

From: [REDACTED]
Sent: Friday, 17 February 2023 11:24
To: Nadar, Thirushan
Subject: RE: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Final Scoping Report Review

Thanks

From: Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Sent: Friday, February 17, 2023 11:06 AM
To: [REDACTED]
Subject: RE: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Final Scoping Report Review

Dear [REDACTED]

Thanks for your response.

As of the date of submission (10 February 2023) of the Final Scoping report to the department, they have 44 days to review and approve it for us to move forward into the EIA phase.

Kind regards



Thirushan Nadar
Consultant

T +27 11 300-6185
[REDACTED]

From: [REDACTED]
Sent: Thursday, 16 February 2023 17:11
To: Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Subject: RE: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Final Scoping Report Review

Thank you Thirushan

Seems that things are now moving ahead.

The timeline going forward?

Regards

[REDACTED]

From: Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Sent: Monday, February 13, 2023 2:26 PM

To: Nadar, Thirushan <Thirushan.Nadar@wsp.com>

Cc: Strong, Ashlea <Ashlea.Strong@wsp.com>; Mmakoena Mmola <Mmakoena.Mmola@enertrag.com>;
Andrea.Gibb@enertrag.com

Subject: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Final Scoping Report Review

Dear Landowner,

NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY, MPUMALANGA

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- Geluk 405 JT (Portion 3)
- Welgevonden 412 JT (Portion 1)
- Camelia 467 JT (Portion 0)

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Datafree Website	https://wsp-engage.com/
OneDrive	 Landowners

WSP contact details are:

Name: Thirushan Nadar

Tel: +27 11 300-6185
Fax: 011 361 1381
E-mail: thirushan.nadar@wsp.com
Address: PO Box 98867, Sloane Park, 2152

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We look forward to your participation in this process.

Kind regards



Thirushan Nadar
Consultant

T +27 11 300-6185
[REDACTED]



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Building 1, Maxwell Office Park, Magwa Crescent West, Waterfall City, Midrand
1685 South Africa

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Nadar, Thirushan

From: Nadar, Thirushan
Sent: Wednesday, 15 February 2023 09:26
To: [REDACTED] Bredenhann, Christo
Cc: Strong, Ashlea; andrea.gibb@enertrag.com; Mmakoena Mmola; [REDACTED]
(NR)
Subject: RE: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Final Scoping Report Review

Dear [REDACTED]

Thanks you for response and willingness to assist on the project.

I have copied the engineer, [@Bredenhann, Christo](#) in the mail. He will contact you if required.

Kind regards



Thirushan Nadar
Consultant

T +27 11 300-6185
[REDACTED]

From: [REDACTED]
Sent: Wednesday, 15 February 2023 09:16
To: Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Cc: Strong, Ashlea <Ashlea.Strong@wsp.com>; andrea.gibb@enertrag.com; Mmakoena Mmola <Mmakoena.Mmola@enertrag.com>; [REDACTED]
Subject: RE: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Final Scoping Report Review

Dear Nadar

I have downloaded the Traffic Scoping Report.

This seems acceptable.

We will await the TIA.

The traffic engineer is welcome to contact us. We might be able to assist with N4 traffic counts from our installed electronic counters.

Regards

[REDACTED]



[REDACTED]
Traffic Engineer
[REDACTED]

www.tracn4.co.za



From: Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Sent: Monday, 13 February 2023 14:30
To: Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Cc: Strong, Ashlea <Ashlea.Strong@wsp.com>; andrea.gibb@enertrag.com; Mmakoena Mmola <Mmakoena.Mmola@enertrag.com>
Subject: NOTICE OF THE PROPOSED DEVELOPMENT OF THE DALMANUTHA WIND ENERGY FACILITY: Final Scoping Report Review

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Datafree Website	https://wsp-engage.com/
OneDrive	 Stakeholders

WSP contact details are:

Name: Thirushan Nadar
Tel: +27 11 300-6185
Fax: 011 361 1381
E-mail: thirushan.nadar@wsp.com
Address: PO Box 98867, Sloane Park, 2152

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We look forward to your participation in this process.

Kind regards



Thirushan Nadar
Consultant

T +27 11 300-6185
[Redacted]



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1685 South Africa

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Registered Number: 1999/008928/07 South Africa

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Bird Life South Africa

Physical Address:

[Redacted]

Postal Address:

Private Bag X16, Pinegowrie, 2123

Tel:

Fax: +

Email:

Ref: 14/12/16/3/3/2/2243

Our Ref: 41103722

13 February 2023


CONFIDENTIAL

Dear [Redacted]

RE: Draft Scoping Report for the Proposed Dalmanutha Wind Energy Facility

WSP acknowledge receipt of your comments dated 26 January 2023. We thank you for your participation in the EIA process.

The Final Scoping Report was submitted to the Department of Forestry, Fisheries and the Environment (DFFE) on 10 February 2023, and it is available at the following links:

WSP Website	https://www.wsp.com/en-ZA/services/public-documents
Data free Website	https://wsp-engage.com/
OneDrive	 Stakeholders

Responses to your comments are included in **Appendix A** attached of this letter.

Yours Faithfully

Thirushan Nadar
Consultant

Digitally signed by Nadar, Thirushan
(ZATN04956)
DN: cn=Nadar, Thirushan (ZATN04956),
ou=Active,
email=Thirushan.Nadar@wsp.com
Date: 2023.05.30 13:24:18 +02'00'

Building 1, Maxwell Office Park
Magwa Crescent West, Waterfall City
Midrand, 1685
South Africa

T: +27 254 4800
wsp.com



Appendix A-WSP Response

COMMENT	RESPONSE
<p>Thank you for the opportunity to comment on the draft Scoping Report for the proposed Dalmanutha Wind Energy Facility. We attended a pre-application meeting with Enertrag regarding the proposed project on 26 October 2022. Unfortunately, the avifaunal specialist, Jon Smallie, was unable to attend the meeting, but we summarised our concerns and recommendations in subsequent emails to Jon.</p> <p>Our recommendations are not, however, reflected in the Scoping Report or Plan of Study for EIA. Many of our comments are therefore repeated below.</p>	<p>EAP: WSP acknowledges this comment.</p>
<p>BirdLife South Africa supports the responsible development of renewable energy infrastructure.</p> <p>However, we are concerned that the location of the proposed facility(ies) is not compatible with the desired state of the habitat by local, provincial and national stakeholders. The proposed development site borders an Important Bird and Biodiversity Area, and includes threatened ecosystems, critical biodiversity areas, ecological support areas, protected area expansion strategy areas and habitat for a number of threatened species.</p>	<p>Avifaunal Specialist: [REDACTED]</p> <p>Early avifaunal screening and pre-construction bird monitoring highlighted these risks to the proponent. It is noted that the site falls within areas classified as critical biodiversity areas. The layout presented in the scoping report will be optimized by the developer to minimise the location of infrastructure within critical biodiversity areas and will be presented within the EIA Report.</p> <p>Furthermore, a biodiversity offset report will be prepared in support of the EA application to compensate for the net loss of biodiversity from the proposed development. This approach ensures the application of the of the mitigation hierarchy to the proposed development, by the developer.</p>
<p>The highveld of Mpumalanga hosts globally and regionally threatened species that are not found in similar abundances in other provinces. Several species are becoming locally extinct, some of which are found at the proposed site (e.g., Wattled Crane). These high-elevation habitats are often used for breeding during the wet season. Given the relatively small remaining portion of untransformed Grasslands and Wetlands in the highveld of Mpumalanga, every step should be taken to safeguard what is left of these habitat types for biodiversity.</p>	<p>Avifaunal Specialist: [REDACTED]</p> <p>Pre-construction bird monitoring data has confirmed the presence of a number of globally and regionally Red Listed bird species, some of which breed on site. These are mostly grassland and wetland habitat specialist species. The areas identified as sensitive for these species have been avoided by the project layout. The proponent is investigating various compensation initiatives and offsets to mitigate the risk of the proposed development to bird species and the overall biodiversity of the site. These initiatives will be detailed in the EIA Phase.</p>
<p>We suggest alternative sites should be considered for development. For example, development west of Ermelo, where land is already heavily transformed, is less likely to impact biodiversity, whereas the Eastern Escarpment should be avoided.</p>	<p>Avifaunal Specialist: [REDACTED]</p> <p>Mapping of sensitive avifaunal features within the proposed site has allowed the refinement of the project layouts within the area, or in other words the consideration of micro alternatives.</p> <p>Applicant: Identifying locations for wind energy facilities are guided by many factors but at the forefront are wind resource and available grid capacity. We are currently in an energy crisis in South Africa and finding locations where there is both a suitable resource and capacity</p>

COMMENT

RESPONSE

[Redacted Comment]

to connect to the grid is challenging and essential. This specific site is at a high elevation and has the best wind speed in the Belfast area. The wind speed at the site is already marginal, so if we were to move the development to a different site, the projects will no longer be economical. Unlike the Cape Provinces of South Africa, where there is abundant wind resources but no available grid capacity, the project site provides the opportunity to connect to the Eskom grid. For this reason, ENERTRAG South Africa are developing a number of projects within the Mpumalanga area, include the Hendrina area and south of Ermelo. ENERTRAG recognises the potential of the Mpumalanga province to shift away from the current coal mining land use which dominates the region and promote renewable energy expansion. We have been actively assessing the wind data in the province, including the installation of a meteorological mast at the Dalmanutha site which has collected over two years of data. Although an alternative site has not been considered as part of the application for environmental authorisation, the location was assessed during the site feasibility assessment. ENERTRAG South Africa would like to investigate the removal of further turbines from the layout and consider technology alternatives in the EIA phase, to alleviate the impact of the project on biodiversity in the area.

Given the sensitivity of the biodiversity within the Project Area of Influence, we are pleased to note that two years of data collection will be conducted for the avifaunal impact assessment. However, it is unclear from the Scoping Report if the data collection methods will be adequate to verify the sensitive features and questions that have been scoped thus far, or those raised below.

Avifaunal Specialist: [Redacted]

The second year of monitoring will be reported on in the EIA phase report. Second year monitoring began in May 2022, prior to the submission of the below comments from BLSA. The trigger for the second year of monitoring was primarily the Cape Vulture risk identified on site. The second year will collect further data on bird abundance and movement on site, in particular for Cape Vulture.

We are concerned that the Project Area of Influence is not well defined in the context of different impact receptors. Please see SANBI's Species Environmental Assessment Guidelines for more guidance in this regard. It may be necessary to conduct surveys outside of the development footprint (e.g., to identify and quantify the use of roosts and breeding sites) and this should be clearly defined during scoping.

Avifaunal Specialist: [Redacted]

We will endeavour to address this aspect in the EIA phase report

We are further concerned that the development site is along the Eastern Escarpment of South Africa.

This geographical feature is a flyway for latitudinal (north to south) and altitudinal (east to west) migrants of species moving within (e.g., cranes, bustards, Southern Bald Ibis, Blue Swallow) and beyond the continent (e.g., White Stork, Amur Falcon). The extensive wetland system at the site would offer stop-over sites for

Avifaunal Specialist: [Redacted]

Pre-construction monitoring has collected data on diurnal bird abundance and flight behaviour on site. Although the second year of the monitoring is still underway, no evidence of migration over the site has been recorded. We will endeavour to obtain and utilise tracking data for the EIA phase. Nocturnal bird movement has not been monitored and would

COMMENT

RESPONSE

migrants transitioning through the landscape. Tracking data should be acquired from past studies/literature to identify which migrants are using this area and when.

Alternatively, other methods (e.g., radar or tracking studies) should be included in the plan of study for impact assessment in order to assess the risk to migratory birds.

require specialised use of radar. We will consult further with BLSA on this in the EIR phase.

We suggest that the scoping report and plan of study should place greater focus on potential risks to the globally Critically Endangered White-winged Flufftail. South Africa and Ethiopia are the only two countries with confirmed breeding records of this highly cryptic species. It is unlikely to be found from observations and we discourage flushing the bird from wetlands. Not far to the north of the proposed site is a stronghold for the species in the Greater Lakenvlei Protected Environment and Middelpunt Nature Reserve. It is likely that the bird is also using the wetlands at the proposed site.

Not much is known about where and when the species migrates to breed in high-elevation wetlands during the wet season (October-March), but birds have been found all along the Eastern Escarpment from the Steenkampsberg in Mpumalanga to southern KZN. Three other species of flufftail have been recorded as fatalities at South African wind farms and we are concerned that it is unlikely that shutdown-on-demand will be an effective mitigation for this small and cryptic species.

Avifaunal Specialist: [REDACTED]

We are aware of the Middelpunt stronghold for White-winged Flufftail (approximately 20km north of the proposed site). We have completed almost 24 months of pre-construction monitoring on site, and not recorded the species on site. We will consult further with BLSA on this in the EIR phase.

BLSA's concern regarding the effectiveness of shutdown on demand is noted. Alternative measures will be investigated in the EIA Phase. The offset strategy referred to above will also address any anticipated residual impact.

We agree that observer led shutdown on demand will not mitigate the risk to this and other species which fly at night. The EIA phase risk assessment will elaborate on this point, and following the mitigation hierarchy, if a residual impact is anticipated an appropriate measure will be designed to compensate for this.

BirdLife South Africa encourages the use of shutdown-on-demand as mitigation to address residual negative impacts associated with fatalities of larger bodied birds. However, we caution that this approach is not appropriate for turbines proposed in areas where they will pose a significant risk to threatened species (where avoidance would be more effective and appropriate). Shutdown-on-demand can be fraught with challenges related to implementation and human (or technological) error and is poorly enforced.

While shutdown-on-demand can be helpful to reduce the risk of fatalities, it does not eliminate it. Fatalities of large-bodied birds, including vultures, Secretarybird and raptors have occurred at wind farms in South Africa implementing this approach.

Avifaunal Specialist: [REDACTED]

BLSA's concern regarding the effectiveness of shutdown on demand is noted. Alternative measures will be investigated in the EIA Phase. The offset strategy referred to above will also address any anticipated residual impact.

A risk assessment of all proposed turbine locations was conducted and the highest risk category turbines were removed from the layout. The layout will be further optimised during the EIA phase.

The ecosystem status of the vegetation types reflected in the draft Scoping Report and Biodiversity Scoping Report appear to be incorrect or outdated. Both Eastern Highveld Grassland and KaNgwane Montane Grassland are Endangered (not Vulnerable and Least Threatened as indicated in the Scoping Report, respectively). The Scoping Report and Impact Assessment need to be

Biodiversity Specialist: [REDACTED]

Thank you for the comment. Available official information on the threat status of vegetation types was utilised to inform the scoping report. These included the gazetted documents provided on SANBI's website (<http://biodiversityadvisor.sanbi.org/planning-and-assessment/environmental->

COMMENT

RESPONSE

updated to accurately reflect the status of these ecosystems.

[assessments/orientation/working-with-threatened-ecosystems/threatened-ecosystems/](#)) including the most recent National Gazette (National Gazette No 34809 of 09 December 2011 Volume 558); the SANBI BGIS (2011) threatened ecosystems spatial dataset (<https://bgis.sanbi.org/SpatialDataset>); and the SANBI National biodiversity assessment (2018) <http://biodiversityadvisor.sanbi.org/planning-and-assessment/national-biodiversity-assessment-nba-2018/>).

We have interrogated the websites once more and have not seen any newer available information. We welcome any newer information that BLSA could share/direct us to source; and the most up-to-date datasets will be utilised in the Terrestrial Biodiversity Specialist Assessment at EIA stage.

The Screening Report does indicate the likely presence of an Endangered ecosystem. To avoid similar mistakes, all biodiversity specialists should be encouraged to pay careful attention and verify the rich information and many sensitivity layers included in the National Environmental Screening Tool.

Biodiversity Specialist: [REDACTED]

The screening reports downloaded on 13/02/2022 indicate the presence of both Vulnerable and Endangered ecosystems; while this is acknowledged in Section 5.1, the available SANBI (2018) NEMBA threatened ecosystems spatial dataset did not align with the screening report – the threat status of the ecosystems will be updated in the Terrestrial Biodiversity Specialist Assessment at baseline phase and will be taken into account for impact assessment, mitigation planning and biodiversity offset report development.

In conclusion, we are of the opinion that there is sufficient data to suggest the site (or a large proportion of the site) is inappropriate for wind farm development due to the significant risks posed to biodiversity. It is unlikely that additional studies will reduce the site sensitivity and the applicant risks “throwing good money after bad”.

Avifaunal Specialist: [REDACTED]

We take note of this position expressed by BLSA and will discuss the approach to further studies if any with the proponent and BLSA in the EIA Phase. In line with the mitigation hierarchy an offset will be investigated to address any residual impacts to ensure no net loss.

However, if they wish to pursue development in this area, we strongly suggest that

Biodiversity Specialist: [REDACTED]

- a) more attention is paid to reduce risks, uncertainties discussed above and flagged in the Site Screening Tool;
- b) the effectiveness and feasibility of proposed mitigation measures must be robustly assessed; and
- c) biodiversity offsets should be considered, as it is unlikely that mitigation alone will ensure that there is no net loss of biodiversity.

Biodiversity offsets are being considered. A biodiversity offset strategy will be prepared in support of the EA application. Stakeholders including BLSA will be consulted to inform the development of the biodiversity offset report.



Mpumalanga Agriculture, Rural Development, Land & Environmental Affairs
Building 4. Aqua Street. Riverside Park, Mbombela,
1200, Mpumalanga Province,

P.O Box 266. Mbombela, 1200
[REDACTED]

Ref: 14/12/16/3/3/2/2243

Our Ref: 41103722

13 February 2023

CONFIDENTIAL

Dear [REDACTED]

RE: FINAL SCOPING REPORT: ACTIVITIES ASSOCIATED WITH THE PROPOSED DALMANUTHA WIND ENERGY FACILITY ON VARIOUS PORTIONS OF THE FARMS BERG EN DAL 378 JT, VOGELSTRUISPOORT 384 JT, WAAIAND 404 JT, GELUK 405 JT, WELGEVONDEN 412 JT AND CAMELIA 467 JT, BELFAST, MPUMALANGA PROVINCE

WSP acknowledge receipt of your comments dated 02 February 2023. We thank you for your participation in the EIA process.

The Final Scoping Report was submitted to the Department of Forestry, Fisheries and the Environment (DFFE) on 10 February 2023, and it is available at the following links:

WSP Website	https://www.wsp.com/en-ZA/services/public-documents
Data free Website	https://wsp-engage.com/
OneDrive	<input type="checkbox"/> Commenting Authority

Responses to your comments are included in **Appendix A** attached of this letter.

Yours Faithfully

Thirushan Nadar
Consultant

Digitally signed by Nadar, Thirushan (ZATN04956)
DN: cn=Nadar, Thirushan (ZATN04956),
ou=Active,
email=Thirushan.Nadar@wsp.com
Date: 2023.05.30 13:24:36 +02'00'

Building 1, Maxwell Office Park
Magwa Crescent West, Waterfall City
Midrand, 1685
South Africa

T: +27 254 4800
wsp.com



Appendix A-WSP Response

COMMENT	RESPONSE
<p>The Department confirms having received the draft scoping report from you for the abovementioned project on 12 December 2022. After reviewing the report, this Department has the following comments:</p> <p>1. The proposed Dalmanutha Wind Energy Facility is located in an area comprising a high diversity of Red Listed Birds, which as confirmed in the Scoping Report, use the full component of micro-habitats on the site.</p>	<p>EAP: This comment is acknowledged to be correct.</p>
<p>2. The Critically Endangered Wattled Crane has been reported to be breeding on site, and there are reports of regular sitings of between one and four individuals within the proposed development footprint.</p>	<p>EAP: This comment is acknowledged to be correct.</p>
<p>3. The risk of collision of many threatened bird species and Red Listed bats on wind turbines, and the risk of collision and electrocution of these species on the MV network is high, with the scoping report assigning a high significance rating before mitigation.</p>	<p>EAP: This comment is acknowledged. During the EIA phase suitable mitigation will be applied in the efforts to reduce the significance rating.</p>
<p>4. On 11 November 2022, the Minister of the Department of Forestry, Fisheries and the Environment gazetted her intent to establish protocols that provide the criteria for the specialist assessment and minimum report content requirements for determining impacts on Cape Vultures associated with the development of onshore wind energy generation facilities, which require environmental authorisation (Notice 2734, Government Gazette, 11 November 2022).</p> <p>The draft protocol prescribes a High to Very High Sensitivity to sites that are located within 50km of a Cape Vulture roost, colony and/or vulture restaurant, and recommends abandoning proposals for wind energy in such areas. According to the scoping report, a number of roosts have been identified on the site.</p>	<p>EAP: This comment is acknowledged. However, WSP notes that this protocol has not yet been promulgated.</p>
<p>5. Shutdown-on-demand is not considered an appropriate means to mitigate the residual negative impacts associated with fatalities of large bodied birds that are listed as threatened.</p>	<p>EAP: This comment is acknowledged. The avifaunal specialist will further investigate mitigation measures during the EIA phase. The offset strategy which will be included in the EIA phase will also address any anticipated residual impact The applicant is also considering removing further turbines from the layout and alternative technologies</p>

COMMENT

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	such as Solar to reduce the risk to the avifaunal population on site.
<p>6. The Scoping Report confirmed that mitigation to reduce or avoid turbine collisions is not possible through spatial avoidance (buffers), and it is our opinion that mitigation is not possible through shutdown-on demand or any other means. The potential loss of critically endangered species must therefore be regarded as a fatal flaw.</p>	<p>EAP: This comment is acknowledged. Layouts have not yet been finalised. Layouts will be optimised to avoid/minimise significant impacts on species of conservation concern. Any significant impacts on flora species of conservation concern will be the subject of detailed additional mitigation measures. Should any significant residual impacts remain, these would be addressed via the biodiversity offset report. The optimised layout at the end of the scoping report was revised to take into account the avifaunal sensitivities (dropping 7 turbines in the northern highly sensitive portion of the site.</p>
<p>According to Regulation 22(b)(i), the competent authority must, within 43 days of receipt of a scoping report - refuse environmental authorisation if — the proposed activity is in conflict with a prohibition contained in legislation.</p>	<p>EAP: This comment is acknowledged.</p>
<p>This Department recommends the refusal of the application in terms of 22(b)(i) on the following grounds:</p>	<p>EAP: WSP acknowledge the MDARDLEA’s recommendation, however, WSP is of the opinion that it would be premature to reject the application at the Scoping phase as the scoping report does not include all the required findings of the detailed studies that are currently being undertaken and therefore does not include sufficient information for the Competent Authority to make an informed decision. The EAP’s recommendation is that the DFFE accept the scoping report such that the EAP and specialists can further assess and mitigate the potential impacts, through consideration of biodiversity offsets, reducing the number of turbines and considering the addition of alternative technologies as well as through engaging with the relevant officials.</p>
<p>The Endangered Cape Vulture, Grey Crowned Crane and the Critically Endangered Wattled Crane, which are confirmed to occur on site (along with a host of Red Listed birds), will be impacted and even likely lost. Mitigation measures proposed to reduce the significance of this impact, which includes painting of blades or shutdown-on-demand, are not likely to result in avoidance of collisions. Since the outcome of such mitigation is unreliable, the potential loss of a critically endangered species must be regarded as a fatal flaw.</p>	<p>EAP: This comment is acknowledged. The avifaunal specialist will further investigate mitigation measures during the EIA phase. The applicant is also considering dropping further turbines from the layout. Furthermore, the applicant is also considering the option of alternative technologies such as Solar to reduce the risk to the avifaunal population on site.</p>
<p>This Department is therefore of the opinion that the proposed Dalmanutha Wind Energy Facility is not in</p>	<p>EAP: This comment is acknowledged.</p>

COMMENT

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line with the National Environmental Management Principle that requires that sustainable development must consider the application of a risk-averse and cautious approach that takes into account the limits of current knowledge about the consequences of decisions and actions.

The EAP confirms that the project is in line with the National Environmental Management Principle that requires that sustainable development must consider the application of a risk-averse and cautious approach that takes into account the limits of current knowledge about the consequences of decisions and actions.

All current assumptions and limitations are outlined in Section 1.6. These will be amended and updated as the detailed studies progress.

The applicant is also considering dropping further turbines from the layout.

Furthermore, the applicant is also considering the option of alternative technologies such as Solar to reduce the risk to the avifaunal population on site.

It is this Department's opinion that, based on the above points, the project is not in line with the National Environmental Management Principle that specifically requires that a development must be socially, environmentally and economically sustainable, as the disturbance of 'ecosystems' and loss of biological diversity cannot be avoided, minimized or remedied. Please contact this office for any further enquiries.

EAP:

This comment is acknowledged.

The EAP is of the opinion that the project can be in line with the National Environmental Management Principle that specifically requires that a development must be socially, environmentally and economically sustainable.

The project will socially and economically address the need for increase in renewable energy generation to mitigate against concerns of climate change and exploitation of non-renewable resources. Furthermore, the specialist studies currently being undertaken will utilise the mitigation hierarchy to provide input into the environmental feasibility and sustainability of the project



Mpumalanga Tourism and Parks Agency
Halls Gateway, N4 National Road, MBOMBELA

Ref: 14/12/16/3/3/2/2243

Our Ref: 41103722

Ref: LUA 22/3315

Unit: LUA/SS

Enquiries: [REDACTED]

Tel/ Fax: [REDACTED]

E-Mail: [REDACTED]

13 February 2023

CONFIDENTIAL

Dear [REDACTED]

RE: THE MTPA COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED DALMANUTHA WIND ENERGY FACILITY FOR THE ENERTRAG UNDER TWO SPECIAL PURPOSE VEHICLES (SPVs) – DALMANUTHA WIND RF (PTY)LTD AND DALMANUTHA WEST WIND RF INCLUDING THE GRID CONNECTION INFRASTRUCTURE FOR BOTH PROJECTS NEAR BELFAST IN MPUMALANGA PROVINCE

WSP acknowledge receipt of your comments dated 02 February 2023 (date of email which letter was sent, however letter not dated). We thank you for your participation in the EIA process.

The Final Scoping Report was submitted to the Department of Forestry, Fisheries and the Environment (DFFE) on 10 February 2023, and it is available at the following links:

WSP Website	https://www.wsp.com/en-ZA/services/public-documents
Data free Website	https://wsp-engage.com/
OneDrive	<input type="checkbox"/> Commenting Authority

Responses to your comments are included in **Appendix A** attached of this letter.

Yours Faithfully

Thirushan Nadar
Consultant

Digitally signed by Nadar, Thirushan
(ZATN04956)
DN: cn=Nadar, Thirushan (ZATN04956),
ou=Active,
email=Thirushan.Nadar@wsp.com
Date: 2023.05.30 13:24:46 +02'00'

Building 1, Maxwell Office Park
Magwa Crescent West, Waterfall City
Midrand, 1685
South Africa

T: +27 254 4800
wsp.com



Appendix A-WSP Response

COMMENT	RESPONSE
<p>Your correspondence with WPS reference 41103722 of November 2022 refer.</p> <p>The applicant proposes the development of a Dalmanutha Wind Energy Facility (WEF) under two Special Purpose Vehicles (SPV) that entails the Dalmanutha Wind Renewable Facility (RF) and Dalmanutha West Wind RF that will extend over an area that is approximately 9400 ha. The project entails the establishment of 70 wind turbines, each with a permanent hard standing area; the establishment of an internal gravel road, approximately 60km long and 6m wide, that will connect the wind turbines; development of buildings that will act as the Battery Energy Storage System (BESS) and maintenance facilities; a site substation; a temporary construction camp and laydown area as well as sewage and ablution facilities. The applicant will erect fencing around the development area of up to 4m high. The proposed directly impacted development footprint is approximately 400 ha. The Dalmanutha site was selected due to its proximity to Gumeni MTS located approximately 17.5 km from the proposed project site.</p>	<p>EAP: This comment is acknowledged.</p>
<p>The MTPA has reviewed the application and objects to the proposed wind farm. However, our comments should be viewed in context to our approach on commenting on the renewable energy applications in the province, and the extreme sensitivity of the receiving area. The MTPA is committed to ensuring a just transition from coal fired coal power stations to green energy, however, we are mindful of the potential impacts of this largely 'new' technology within the province, particularly on species that are already at risk of extinction.</p>	<p>EAP: This comment is acknowledged.</p>
<p>The MTPA is currently working with several the Independent Power Producers (IPP) that will be leasing land from Eskom for renewable energy projects. There are 17 projects and we don't foresee any fatal flaws at this stage of the assessment. Furthermore, the DFFE's Renewable Energy EIA Application database has 21 projects occurring in the province of which only 1 may have some impacts on biodiversity. WSP and Enertrag have also submitted 5 applications to the MTPA wherein we have supported the development of the Camden 1 and 2 projects, even though there were some sensitivities. This context is important because the MTPA has until now not objected to any of the renewable energy applications. Unfortunately, the location of the proposed Dalmanutha Wind Energy Facility (DWEF) is in an area where the risk of collision with many threatened bird species is simply too great to be supported by us. The project is fatally flawed. We have sought counsel with Birdlife, Endangered Wildlife Trust, VulPro, bird specialists, and our local Department of Agriculture, Rural Development, Rural Development Land and Environmental Affairs (DARDLEA), and we are all in agreement that the location of the proposed DWEF should not be approved.</p>	<p>EAP: This comment is acknowledged. We would welcome further engagement with MTPA in the EIA phase to input into the investigation of alternative technologies (e.g., solar) as well the option of further reducing turbines to minimize impacts to birds.</p>

COMMENT

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<p>Before getting into the reasons for the objection, it is important to note that each pylon may be up to 200m high with a rotor blade 100m long. Although the standing area of the turbines may only be 4 ha in size, the area impacted by the blades will be a lot larger, in fact, the area covered by the blades (as a sphere) is around 418 ha (see Figure 1).</p>	<p>EAP: This comment is acknowledged. WSP can confirm that the information has been shared with the Avifaunal Specialist for consideration during the EIA phase.</p>
<p>Reasons for our objection There are several reasons for our objection, and many of which can be mitigated and perhaps offset, but there are handful of fatal flaws that we will mention below. We are a bit fortunate that several wind farms have been established in the Western and Eastern Cape and we can learn from these processes.</p>	<p>EAP: This comment is acknowledged. WSP can confirm that the information has been shared with the Avifaunal Specialist for consideration during the EIA phase.</p>
<p>To pre-empt a response from the developer that these impacts can be mitigated, this is not always possible. We learnt this week from VulPro that two threatened vultures recently perished after colliding with a rotor blade at a wind farm in the Eastern Cape. This was with the mitigation measures in place. The risk of a single failure could have devastating impacts on some of the species we are concerned about. A 1km buffer is simply not adequate as birds are very mobile and the 100m long rotor blades are spinning and unseen and undetected by the birds (see Figures 1 and 3). If we consider what buffers are being proposed for some species, like the Cape Vulture, then research proposes a 50km buffer around frequently used roost sites. As far as we can tell, there is absolutely no scientific basis for the small buffers proposed as mitigation measures in the scoping report. Birds do not frequent small areas, they cover large areas and a more adequate buffer of 15-20 km would probably be a minimum for species threatened with extinction (in our opinion).</p>	<p>EAP: This comment is acknowledged. WSP can confirm that the information has been shared with the Avifaunal Specialist for consideration during the EIA phase.</p>
<p>Avifaunal Sensitivity Unlike areas that are no longer natural, that bird and bat species can avoid, a wind farm located in an important areas for birds, and as an important regional flyway, will be a death trap to the species moving through it. Mitigation measures may reduce the impacts, but they will still occur as has been observed in many of the current wind farms in South Africa. Even with mitigation, birds and bats do die. I do not believe we can afford to lose even a handful of individual birds based on the following.</p>	<p>EAP: This comment is acknowledged to be correct. The EIA phase of the project will further investigate the avifaunal impacts which have been identified in the FSR. WSP can confirm that the layout provided will be subject to change and micro siting of the turbine positions will be included as an important mitigation measure. Layouts have not yet been finalised. Layouts will be optimised to avoid/minimise significant impacts on species of conservation concern. Any significant impacts on species of conservation concern will be the subject of detailed additional mitigation measures. Should any significant residual impacts remain, these would be addressed via the biodiversity offset strategy. The optimised layout at the end of the scoping report was revised to take into account the</p>

COMMENT

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	<p>avifaunal sensitivities (dropping 7 turbines in the northern highly sensitive portion of the site.)</p> <p>Further turbine reductions are being considered during the EIA phase.</p> <p>In addition to the above revision, the EIA phase will explore alternative technologies (e.g., solar) as well the option of further reducing turbines to minimize impacts to birds and the overall biodiversity.</p>
<p>Significant regional diversity and density of threatened bird species.</p> <p>The MTPA has for over the last 25 years been managing a database of threatened species observations, which it uses in the development of its biodiversity sector plan and protected area expansion strategies. This database was queried to identify the number of species of conservation concern (threatened or rare) occurring within the DWEF footprint area, and we have a total of 71 observations for 19 species. Of these, 14 are bird species and 5 are plant species. These are presented in Table 1 and exclude those species identified by the specialists for this draft scoping report.</p>	<p>EAP:</p> <p>This comment is acknowledged.</p> <p>WSP can confirm that the information has been shared with the Avifaunal Specialist for consideration during the EIA phase.</p>
<p>Many of the records in our database are based on collating observations from other scientists and research reports. This data is skewed towards areas which have been surveyed. In Figure 2, the map shows more records towards the north although we believe that if the same research effort was applied to the southern section, we would have a lot more observations for this area too as they are ecologically very similar.</p>	<p>EAP:</p> <p>This comment is acknowledged. The avifaunal findings in the EIA phase report will be based data collected from two years of bird monitoring which will adequately show the bird abundance and movement for both the northern and southern parts of the site.</p>
<p>The occurrence of the following specific bird species of concern</p> <p>The below sections highlights the occurrence of several bird species of conservation concern, where we feel that the proposed mitigation measures would be unable to protect these species from collisions.</p>	<p>EAP:</p> <p>This comment is acknowledged.</p>
<p>Cape Vulture, <i>Gyps coprotheres</i>, Endangered.</p> <p>Up to 100 individuals have been recorded on site at a time. The specialist report confirms that this species forages and roosts within footprint area (at least 43 roosting on the Eskom pylons).</p> <p>A local farmer even established a vulture restaurant to support the vultures. Wind farms are known to kill Cape Vultures and nationally Birdlife have developed guidelines for Cape Vultures and wind farms (Pfeiffer & Ralston-Paton 2018), and these recommend a 50km buffer around frequently used roosts.</p>	<p>EAP:</p> <p>This comment is acknowledged.</p> <p>WSP can confirm that the information has been shared with the Avifaunal Specialist for consideration during the EIA phase.</p>
<p>On the 11 November 2022, DFFE gazetted its intent establish protocols that provide the criteria for the specialist assessment and minimum report content requirements for determining impacts on Cape Vultures associated with the development of onshore wind energy generation facilities,</p>	<p>EAP:</p> <p>This comment is acknowledged.</p>

COMMENT

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which require environmental authorisation (Notice 2734, Government Gazette, 11 November 2022). The significance of some of these protocols, when gazetted, is that:

- The site sensitivity verification must be for a period not less than 12 months.
- The specialist undertaking the work must have demonstrated expertise in Cape Vulture observation and research.
- Vantage point monitoring must be by two people at the same time for a duration of at least 72 hours per vantage point for the 12 months. Vantage point monitoring is to determine the level of Cape Vulture flight activity on the site and the height of flight.
- Consultation with relevant non-governmental organisations with an interest in Cape Vulture protection including BirdLife South Africa, VulPro and the Endangered Wildlife Trust.

WSP can confirm that the information has been shared with the Avifaunal Specialist for consideration during the EIA phase.

WSP notes that this protocol has not yet been promulgated.

Where the significance rating for the Cape Vulture alone is Very High and High, then the area is potentially unsuitable for wind energy (as per protocol). There are several criteria proposed for an area to qualify as Very High to High significance, and one of these is if it is within 50 km of the proposed wind farm. As the frequently used roost is within the proposed wind farm, this criterion would be triggered and the sensitivity would be Very High to High. Application of the guidelines would then prohibit any wind farms within 50 km of the Cape Vulture roost.

The Cape Vulture protocol lists a bunch of other required documentation, such as monitoring plans, a Cape Vulture Specialist Assessment, compliance statements, etc..

EAP:

This comment is acknowledged.

WSP can confirm that the information has been shared with the Avifaunal Specialist for consideration during the EIA phase.

White-backed Vulture, *Gyps africanus*, Critically Endangered.

Not resident but observed flying over area. We don't anticipate an impact on this species but it highlights the broader importance of this area and the likely occurrence of an important flyway for large bodied birds over this area.

EAP:

This comment is acknowledged.

WSP can confirm that the information has been shared with the Avifaunal Specialist for consideration during the EIA phase.

Wattled Crane, *Grus carunculata*, Critically Endangered.

This species alone is a fatal flaw for this project, let alone all the numerous other sensitivities that we will mention. With the occurrence of between 1 and 4 individuals that are regularly seen within the footprint area, and that are reported to be breeding (according to farmer. but chicks have been observed by ornithologist), we cannot allow for a single adult bird to be lost due collision with a rotor blade from a wind farm. This species is Critically Endangered and the numbers of Wattle Crane are declining in the province and we currently only have between 3 and 6 pairs of Wattled Crane (EWT, pers com.). Therefore, we can afford to loose a single bird

EAP:

This comment is acknowledged.

WSP can confirm that the information has been shared with the Avifaunal Specialist for consideration during the EIA phase.

Consideration will be given to the Wattled Crane during the investigation of alternative technologies (e.g., solar) as well the option of further reducing turbines to minimize impacts to this species.

In addition, the following Red data species too:

- Grey Crowned Crane, *Balearica regulorum*, Endangered. Breeding pair within footprint area.

EAP:

This comment is acknowledged.

COMMENT

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- Black-rumped Buttonquail, *Turnix nanus*, Endangered. Several occurrences within footprint
- Blue Crane, *Anthropoides paradiseus*, Vulnerable. Several birds forage within footprint and with 1 nest on site.
- Southern Bald Ibis, *Geronticus calvus*, Vulnerable. Forages and roosts within footprint area. Up to 18 birds with 5 nesting birds in colony.
- Yellow-breasted Pipit, *Anthus chloris*, Vulnerable. Three pairs observed over a number of years.
- Denham’s Bustard, *Neotis denhami*, Vulnerable. Large bodied bird that forages within footprint area.
- Secretary bird, *Sagittarius serpentarius*, Vulnerable. Occurs within footprint area across all seasons.
- White-bellied Korhaan, *Eupodotis senegalensis*, Vulnerable. Occurs within footprint area across all seasons.
- Lanner Falcon, *Falco biarmicus*, Vulnerable. Occurs within footprint area across all seasons.
- Blue Korhaan, *Eupodotis caerulescens*, Near Threatened. Observed within footprint area.
- Greater Flamingo, *Phoenicopterus ruber*, Near Threatened. Observed within footprint area.
- Lesser Flamingo, *Phoenicopterus minor*, Near Threatened. Probable (SABAP 2 data).

WSP can confirm that the information has been shared with the Avifaunal Specialist for consideration during the EIA phase.

Located along important escarpment Flyway for Birds
 Although we don’t have data to substantiate it, the high escarpment area that runs from Dullstroom down to Wakkerstroom is in all likelihood a flyway used by large birds that move and forage, or migrate, over large distances. We require satellite-tracking devices fitted to more birds to confirm this, but if we consider all of our current foraging areas, limited bird tracking data, and observations for these large bodied birds, then this eastern escarpment area is certainly an area in all likelihood an important flyway. The DWEF is located in the centre of this flyway and the birds utilising this corridor may collide with the blades of the turbines.

EAP:
 This comment is acknowledged.
 WSP can confirm that the information has been shared with the Avifaunal Specialist for consideration during the EIA phase.
Avifaunal Specialist: Jon Smallie
 Pre-construction monitoring has collected data on diurnal bird abundance and flight behaviour on site. Although the second year of the monitoring is still underway, no evidence of migration over the site has been recorded. We will endeavour to obtain and utilise tracking data for the EIA phase. Nocturnal bird movement has not been monitored and would require specialised use of radar. We will consult further with BLSA on this in the EIR phase.

Important Bird and Biodiversity Areas (IBBAS)
 IBBA’s are Birdlife’s demarcated areas that are globally important for the conservation of bird populations on the basis of an internationally agreed set of criteria. It is very significant that the proposed DWEF occurs in part of the Steenkampsberg IBBA. The Avian Demography UNIT from the University of Cape Town also manages a handful or Coordinated Avifaunal Road counts (CAR) throughout some of the priority birding areas of the country and two of these occur within the proposed DWEF (see Figure 5-28 of draft scoping report). In addition, the Avian wind farm sensitivity

EAP:
 This comment is acknowledged.
 Section 5.2.1 of the FSR notes that the proposed wind farm partially overlaps the Steenkampsberg Important Bird and Biodiversity Area.
 WSP can confirm that the information has been shared with the Avifaunal Specialist for consideration during the EIA phase.

COMMENT

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map also highlights the significant sensitivity of the pentad in which the DWEF occurs (see Figure 5-29 of draft scoping report).
Therefore, from a national and international planning point of view, the proposed DWEF is partly located with a significant priority area for birds and any kind of development that may kill significant numbers of adult birds over a number of years, should not be authorised here.

There are also numerous pans and wetlands within the study area that will attract bird species, such as the Flamingos that move between pans (see Figure 5-25 of draft scoping report). The African March Harrier will frequent the wetlands areas, together with some of the cranes. A 1km buffer from these areas are grossly inadequate.

The DWEF, and the associated infrastructure, will have a direct impact on biodiversity in terms of land actually transformed from a natural to a transformed state. The draft Scoping report tries to address and mitigate these impacts. These impacts include impacts to our Critical Biodiversity Areas Irreplaceable sites (see Figure 4), however these can in part be addressed by the mitigation measures. However, it is the indirect and long-term indirect impacts from collisions with the blades on the avifaunal and bat diversity that is of most concern.

Wind Resource

The project site was selected based on proximity to grid, availability of land, and an acceptable wind resource (estimated 6 - 7 m/s). We are aware that the data source for these wind speed calculations is based on the interpolation of a number of very sparse weather stations that actually record wind speed (High-Resolution Wind Resource Map for South Africa 2020 March 2021). Most of the suitable stations are actually located in the southern half of South Africa. The values for Mpumalanga are also quite low when compared nationally, and it highlights the inherent uncertainty with a marginal wind resource that may result in the collision with many birds of conservation concern if approved.

No Project Alternative

It so reported that the “no project” alternative would be a missed opportunity to address the need for increases in renewable energy generation. We realise that but believe

EAP:
This comment is acknowledged.
WSP can confirm that the information has been shared with the Avifaunal Specialist for consideration during the EIA phase.

EAP:
This comment is acknowledged.
Layouts have not yet been finalised. Layouts will be optimised and turbines will be removed to avoid/minimise significant impacts on species of conservation concern.
Any significant impacts on species of conservation concern will be the subject of detailed additional mitigation measures. Should any significant residual impacts remain, these would be addressed via the biodiversity offset strategy.

Applicant:
When identifying locations for wind energy facilities the wind resource is equally important as the available capacity to connect to the Eskom grid. We are currently experiencing an energy crisis in South Africa and finding locations where there is both a suitable resource and capacity to connect to the grid is challenging and essential. Unfortunately in the Cape Provinces of South Africa, where there is abundant wind resources, the available grid capacity is severely constrained, however the project site provides the opportunity to connect to the Eskom grid. ENERTRAG recognises the potential of the Mpumalanga province to shift away from the current coal mining land use which dominates the region and promote renewable energy expansion. We have been actively assessing the wind data in the province, including the installation of a meteorological mast at the Dalmanutha site which has collected over two years of data. This specific site is at a high elevation and has the best wind speed in the Belfast area.

EAP:
The optimised layout at the end of the scoping report was revised to take into account the

COMMENT

RESPONSE

<p>there are several other renewable energy applications trying to similarly address this need but that the risk to our vulnerable threatened bird and bat species is too grate to consider in this specific area. Perhaps the developer can consider alternative green energy solutions, such as hydrocarbons, for this area. However, a wind farm is not a suitable development model for this sensitive area.</p>	<p>avifaunal sensitivities (dropping 7 WTG in the northern highly sensitive portion of the site.) In addition to the above revision, the EIA phase will explore alternative technologies (e.g., solar) as well the option of further reducing turbines to minimize impacts to birds and the overall biodiversity.</p>
<p>Terrestrial biodiversity assessment The draft scoping report acknowledges the significant occurrence of Critical Biodiversity Areas (CBA) Irreplaceable within the footprint area (Figure 4). The scoping report also acknowledges that the majority of the infrastructure is also placed within the National Protected Area Expansion Areas (2016) terrestrial priority focus areas. Both the desktop and specialist survey acknowledge the High Sensitivity of the terrestrial biodiversity. This sensitivity supports the concern we have around the difficulties of trying to mitigate impacts on provincial and national biodiversity priority areas. It is impossible to mitigate impacts on the CBA Irreplaceable areas.</p>	<p>EAP: This comment is acknowledged. Should any significant residual impacts remain, these would be addressed via the biodiversity offset strategy in the EIA phase.</p>
<p>Errors or misleading information in the Draft Scoping report We noted that the elevation map in Figure 5-9 and Figure 5-16, do not include a legend for elevation and that the elevation symbology collar ramp has been reversed. Therefore, the colours that usually represent high altitude areas now represent low altitude areas. In Figure 5-21, there is reference to the priority focus areas of the National Protected Area Development Areas (2016). This is incorrect. It is in fact the National Protected Area Expansion Areas (2016). Several species under the avifaunal section do not have the Latin names included. Some do, some do not, and a more consistent approach is requested.</p>	<p>EAP: This comment is acknowledged. Section 5.1.3 clearly notes that the areas with high elevation are shown in green on Figure 5 9 and Figure 5.16. The concern has been raised with the relevant specialist and this will be amended in the EIAr. The labelling on Figure 5.21 is derived from the information provided in the shapefile. This will be amended in the Draft EIAr. The Avifauna specialist has been informed of the inconsistency and will ensure this is taken into account in the Draft EIAr.</p>
<p>In conclusion, we are very concerned about the proposed establishment of a wind farm, and if approved, the proposed wind farm will have devastating impact on the threatened bird species found within this area. Specialist study itself acknowledges that “The proposed WEF will pose a collision risk to several priority species which could occur regularly at the site. Species exposed to this risk are large terrestrial species and occasional long-distance fliers i.e., bustards, cranes, flamingos, storks, Southern Bald Ibis and Secretary bird”. The evidence available is overwhelming; it confirms the occurrence of a very special, important, and vulnerable high-altitude grassland area that is supporting a number of threatened bird species throughout the year. This includes the Critically Endangered Wattled Crane where we only have between 3 and 6 pairs left in the province. The impact of losing a single bird could have national and global consequences for the survival of this species.</p>	<p>EAP: This comment is acknowledged. We would welcome further engagement with MTPA in the EIA phase to input into the investigation of alternative technologies (e.g., solar) as well the option of further reducing turbines to minimize impacts to birds.</p>

COMMENT

Furthermore, the proposed mitigation measures are grossly inadequate and we feel strongly (convicted is perhaps a better word), that this application is fatally flawed due to its impacts on the avifauna. We advise the applicant to look into developing other forms of renewable energy or move the location of this proposed development much further away

RESPONSE

EAP:
 This comment is acknowledged.
 The EIA phase of the project will further investigate the avifaunal impacts which have been identified in the FSR, once the two years of bird monitoring is complete and confirms the bird abundance and movement in the area.
 WSP can confirm that the layout provided will be subject to change and micro siting of the turbine positions will be included as an important mitigation measure.
 Further turbine reductions are being considered during the EIA phase.
 Layouts have not yet been finalised. Layouts will be optimised to avoid/minimise significant impacts on species of conservation concern.
 Any significant impacts on species of conservation concern will be the subject of detailed additional mitigation measures. Should any significant residual impacts remain, these would be addressed via the biodiversity offset strategy.
 The optimised layout at the end of the scoping report was revised to take into account the avifaunal sensitivities (dropping 7 WTG in the northern highly sensitive portion of the site.)
 In addition to the above revision, the EIA phase will explore alternative technologies (e.g., solar) as well the option of further reducing turbines to minimize impacts to birds and the overall biodiversity.



Email – [Redacted]
Telephone – [Redacted]

Ref: 14/12/16/3/3/2/2243
Our Ref: 41103722
13 February 2023
CONFIDENTIAL

Dear [Redacted]

RE: Environmental Concerns regarding the proposed Dalmanutha Wind Energy Project

WSP acknowledge receipt of your comments dated 25 January 2023. We thank you for your participation in the EIA process.

The Final Scoping Report was submitted to the Department of Forestry, Fisheries and the Environment (DFFE) on 10 February 2023, and it is available at the following links:

WSP Website	https://www.wsp.com/en-ZA/services/public-documents
Data free Website	https://wsp-engage.com/
OneDrive	<input type="checkbox"/> Stakeholders

Responses to your comments are included in **Appendix A** attached of this letter.

Yours Faithfully

Thirushan Nadar
Consultant

Digitally signed by Nadar, Thirushan
(ZATN04956)
DN: cn=Nadar, Thirushan (ZATN04956),
ou=Active,
email=Thirushan.Nadar@wsp.com
Date: 2023.05.30 13:24:57 +02'00'

Building 1, Maxwell Office Park
Magwa Crescent West, Waterfall City
Midrand, 1685
South Africa

T: +27 254 4800
wsp.com



Appendix A-WSP Response

COMMENT

RESPONSE

As a long-term shareholder in the De Rust Trout Farm, I've explored much of the northern-western section of the proposed development recording biodiversity over more than thirty years – both on De Rust, and on surrounding farms.

The primary focus of these studies was initially birds, but broadened out to include orchids and other taxa, most recently Odonata (dragonflies and damselflies). For several years, I have been forwarding all records for Red Data bird species, and also of orchids, to MTPA with the co-ordinates of the sightings. I've also submitted sightings data to the various atlas projects administered by the Virtual Museum, and also to SABAP2

All my records of Red Data bird species and orchid sightings were also made available to the specialists involved in the scoping exercise. Two recent sightings however need to be added to the material already supplied to the consultants.

Note: At the time I made these data available, the layout shown to me was significantly different to that laid out in the Scoping Report.

EAP:

WSP acknowledges this comment. During the scoping phase the layout was updated taking into account the sensitive areas identified by the specialists and an optimised layout at the end of the scoping report was revised to take into account the avifaunal sensitivities (dropping 7 turbines in the northern highly sensitive portion of the site.)

In addition to the above revision, the EIA phase will explore alternative technologies (e.g., solar) as well the option of further reducing turbines to minimize impacts to birds and the overall biodiversity.

Pallid Harrier – *Circus macrourus* (Near-Threatened)

On 19 November 2022, I had a sighting of an adult male Pallid Harrier at approximate co-ordinates -25.765134°; 30.118627° (decimal degrees). The bird was hunting over the valley heading in a NW direction towards the Geluk Road and was observed for about 15 minutes over the valley – mainly over the western section.

This is the second November record in four years of an adult male of this species, and the possibility that it is the same bird returning cannot be ruled out. The previous sighting was at approximate co-ordinates -25.757903°; 30.121521°, with the bird heading W towards the Geluk Road.

Note: This sighting of this species was not forwarded to the scoping assessment team as I did not include sightings of possible vagrants in that submission.

EAP:

WSP acknowledges this comment.

WSP can confirm that the information has been shared with the Avifaunal Specialist for consideration during the EIA phase.

Secretarybird – *Sagittarius serpentarius* (Vulnerable)

On 15 December 2022, a single adult bird was seen swallowing a snake at approximate co-ordinates -25.748908°; 30.123378, adding to the records of this Red-listed species within the project area.

EAP:

WSP acknowledges this comment.

WSP can confirm that the information has been shared with the Avifaunal Specialist for consideration during the EIA phase.

COMMENT

RESPONSE

<p>My primary objections and concerns regarding the proposed development are as follows: A significant number of WTG's are proposed for the valley running SE from the Berg-en-Dal War Memorial. This area has a known, high occurrence of Red-listed avifauna including Wattled Cranes (Critically Endangered); Cape Vulture (Endangered); Secretarybird (Vulnerable); White-bellied Bustard (Vulnerable); Southern Bald Ibis (Vulnerable); Black-rumped Buttonquail (Vulnerable); Yellow-breasted Pipit (Vulnerable), Lanner (Vulnerable); Peregrine (Near-Threatened) and Pallid Harrier (Near-threatened). In addition, I've recorded Denham's Bustard (Vulnerable) on the western side of the valley on one occasion. The proposed sites for these WTG's pose a real risk to the local, and in some cases, the national populations of these species.</p>	<p>EAP: WSP acknowledges this comment. The layout provided in the DSR is a preliminary layout and is subject to change. The optimised layout at the end of the scoping report was revised to take into account the avifaunal sensitivities (dropping 7 WTG in the northern highly sensitive portion of the site.) In addition to the above revision, the EIA phase will explore alternative technologies (e.g., solar) as well the option of further reducing turbines to minimize impacts to birds and the overall biodiversity.</p>
<p>In the case of the Wattled Crane in particular, up to four birds have been recorded in this valley – a significant part of South Africa's wild population.</p>	<p>EAP: WSP acknowledges this comment. WSP can confirm that the information has been shared with the Avifaunal Specialist for consideration during the EIA phase. As noted, the EIA phase will explore alternative technologies (e.g., solar) as well the option of further reducing turbines to minimize impacts to birds, including the Wattled Crane.</p>
<p>Barn Swallows and Amur Falcons occur in numbers during mid-to-late summer, with the swallows frequently roosting in the Phragmites reedbeds at the inflow to the De Rust dam. In some years this roost contains an estimated 10,000 birds. Both species could sustain significant losses.</p>	<p>EAP: WSP acknowledges this comment. WSP can confirm that the information has been shared with the Avifaunal Specialist for consideration during the EIA phase.</p>
<p>While a remote sensing and emergency shut-down procedure has been proposed to detect approaching birds and to rapidly stop the affected turbine(s), I have no information as to the efficacy of this mitigation. I am also unaware whether the proposed system will detect and respond effectively to the smaller species such as Black-rumped Buttonquail and Yellow-breasted Pipit.</p>	<p>EAP: WSP acknowledges this comment. Further impact assessments will be carried out in the EIA phase. WSP can confirm that the information has been shared with the Avifaunal Specialist for consideration during the EIA phase.</p>
<p>The former species probably undertakes long-distance movements at night (the related Common Buttonquail does), while the latter undertakes display flights which would put it at risk of collision with the turbine blades. The valley is prone to episodes of thick mist, with visibility falling to less than 10 m on occasion (pers. obs.), and this could also increase the risk of collisions with the installations for all bird species.</p>	<p>EAP: WSP acknowledges this comment. WSP can confirm that the information has been shared with the Avifaunal Specialist for consideration during the EIA phase.</p>
<p>Noise impacts on birds While the scoping report discusses noise impacts in respect of human receptors i.e. at people at dwellings etc. there appears to have been no recognition or</p>	<p>EAP: WSP acknowledges this comment. WSP can confirm that the information has been shared with the Acoustic, Avifaunal and Biodiversity Specialist for consideration during the EIA phase.</p>

COMMENT	RESPONSE
<p>investigations as to the possible negative impacts of turbine noise on the surrounding bird populations.</p>	
<p>Research in Holland for example has shown that traffic noise caused a decline in the nesting populations of Willow Warbler – <i>Phylloscopus trochilus</i> in an adjacent wood, with the cause put down to sonic interference with vocalisations of the males – particularly those used in territorial defence and mate attraction.</p>	<p>EAP: WSP acknowledges this comment. WSP can confirm that the information has been shared with the Acoustic, Avifaunal and Biodiversity Specialist for consideration during the EIA phase.</p>
<p>If turbine noise falls in the same frequency range as say that of the deep hooting calls of Black-rumped Buttonquail, collision risks apart, this could render the area completely unsuitable for this species.</p>	<p>EAP: WSP acknowledges this comment. WSP can confirm that the information has been shared with the Acoustic, Avifaunal and Biodiversity Specialist for consideration during the EIA phase.</p>
<p>Sound pressure for some distance around the WTG's could drown out or suppress any communications between conspecifics, again making large parts of the valley unsuitable for a variety of bird species. Based on this, I would question a number of the risk level assessments in the scoping report and strongly suggest that these be revisited.</p>	<p>EAP: WSP acknowledges this comment. WSP can confirm that the information has been shared with the Acoustic, Avifaunal and Biodiversity Specialist for consideration during the EIA phase.</p>
<p>Some scientific papers on the impacts of noise on birds Y. Tef-Seker; O. Berger-Tal; Y. Lenhardt, and N. Teshner 2022: Noise pollution from wind turbines and its effects on wildlife: A cross-national analysis of current policies and planning regulations. Renewable and Sustainable Energy Reviews, Science Direct. Conomy, J.T.; Dubovsky, J.A.; Collazo, J.A. and Fleming, W.J. 1998. Do Black Ducks and Wood Ducks Habituate to Aircraft Disturbance? The Journal of Wildlife Management, Vol. 62, No 3 (Jul. 1998): 1135 – 1142. Grubb, M.M. 1979. Effects of Noise Levels on Nesting Herons and Egrets. Proceedings of the Colonial Waterbird Group, Vol. 2 (1979): 49 – 54. Habib, L.; Bayne, M.E. and Boutin, S. 2007. Chronic industrial noise affects pairing success and age structure of ovenbirds <i>Seiurus aurocapilla</i>. Journal of Applied Ecology (2007) 44: 176 – 184 Reijnen, R. & Foppen, R. 1994. The Effects of Car Traffic on Breeding Bird Populations in Woodland. 1. Evidence of Reduced Habitat Quality for Willow Warblers <i>Phylloscopus trochilus</i> breeding Close to a Highway. Journal of Applied Ecology, Vol. 31, No. 1 (Feb., 1994): 85 -94 Reijnen, R.; Foppen, R. & Meeuwsen, H. 1996. The effects of traffic on the density of breeding birds in Dutch agricultural grasslands. Biological Conservation 75 (1996): 255 – 260 Trimper, P.G.; Standen, N.M.; Lye, L.M.; Lemon, D.; Chubbs, T.E. & Humphries, G.W. 1998. Effects of Low-Level Jet Aircraft Noise on the Behaviour of</p>	<p>EAP: WSP acknowledges this comment. WSP can confirm that the information has been shared with the Acoustic, Avifaunal and Biodiversity Specialist for consideration during the EIA phase.</p>

COMMENT

RESPONSE

<p>Nesting Osprey. Journal of Applied Ecology, Vol. 35, No. 1 (Feb., 1998), pp. 122-130</p> <p>Vos, D.K.; Ryder, R.A. & Graul, W.D. 1985. Response of breeding Great Blue Herons to human disturbance in North-central Colorado. Colonial Waterbirds, Vol. 8, No. 1 (1985): 13 - 22</p>	
<p>For the reasons given above, I WOULD NOT SUPPORT THE INSTALLATION OF ANY WTG's IN THIS VALLEY! In particular, all of the following WTG sites are either in, or within dangerous proximity to places where I have recorded Wattled Cranes and/or other Red Data bird species.</p> <p>Problematic WTG sites</p> <p>WTG 02 WTG 03 WTG 04 WTG 05 WTG 06 WTG 07 WTG 08 WTG 12 WTG 13 WTG 14 WTG 15 WTG 16 WTG 17</p> <p>In addition, the following sites may pose a threat to Red-listed bird species and I request that a detailed evaluation is performed to determine the extent of any risk.</p> <p>WTG 18 WTG 30 WTG 37</p>	<p>EAP:</p> <p>WSP acknowledges this comment.</p> <p>WSP notes that the only layout map in the Scoping report with numbering on the WTG, is the pre-optimised layout.</p> <p>Therefore, this comment is based on the pre-optimised layout, as the optimised layout does not have turbine numbers on it.</p> <p>From the WTG listed as problematic, the following are no longer on the optimised layout, which is included in the FSR in Figure 6-21:</p> <p>WTG 06 WTG 07 WTG 08 WTG 14 WTG 15 WTG 16 WTG 17</p> <p>The optimised layout at the end of the scoping report was revised to take into account the avifaunal sensitivities (dropping 7 turbines in the northern highly sensitive portion of the site.)</p> <p>In addition to the above revision, the EIA phase will explore alternative technologies (e.g., solar) as well the option of further reducing turbines to minimize impacts to birds and the overall biodiversity.</p>
<p>Odonata diversity. I have recorded a significant diversity of Odonata within the project area – primarily around the De Rust dam. Endemic/limited-range species such as Springwater Sprite – <i>Pseudagrion cafferum</i>, Sapphire Bluet – <i>Africallagma sapphirinum</i> and Round-winged Bluet – <i>Proischura rotudipennis</i> amongst others have been identified and photographed.</p> <p>Such diversity is considered an indicator of a healthy aquatic ecology and good water quality.</p> <p>It is essential therefore that any development of roads, CWT sites etc. involved in the installation or operation of the project does not alter current flow patterns or compromise water quality in any way.</p>	<p>Biodiversity Specialist: Aisling Dower</p> <p>Thank you for the comment and information. High flow and low flow baseline aquatic ecosystem surveys of streams and rivers within the study area have been conducted; the results of these studies will be presented in the baseline reports at EIA phase and will take these findings into consideration.</p> <p>Mitigation planning for any new road crossings of watercourses will adhere to the mitigation hierarchy, first seeking to avoid and then minimise any potential impacts on the watercourse.</p>

COMMENT

RESPONSE

<p>At least two orchid species – <i>Habenaria anguiceps</i> and <i>Disa aconitoides</i> are likely to be extirpated should the installation of WTG 14 and 15 go ahead.</p> <p>The co-ordinates of these populations were provided to the scoping phase ecologist and both sites are likely to experience significant disturbance during the construction phase. <i>D. aconitoides</i> is an uncommon orchid in Mpumalanga and is usually recorded either as single plants, or in small colonies, while there are very few localities know for <i>H. anguiceps</i> in the province.</p> <p>Efforts to remove these populations and re-establish them elsewhere are unlikely to prove successful.</p>	<p>Biodiversity Specialist: [REDACTED]</p> <p>Layouts have not yet been finalised. Layouts will be optimised to avoid/minimise significant impacts on species of conservation concern.</p> <p>Any significant impacts on flora species of conservation concern will be the subject of detailed additional mitigation measures. Should any significant residual impacts remain, these would be addressed via the biodiversity offset report.</p>
<p>Noise</p> <p>From the scoping report it appears that the farm house – (Receptor 16 in Figure 5-31) is between 500 and 850 m from the closest turbine, with at least two others that appear to be within 1000 m of the house (WTG’s 13, 14 & 15 to the west of the house).</p> <p>There is also the possibility of noise disturbance arising from WTG’s 19, 20 & 21 situated to the SE of the house. Site topography might mitigate noise to a certain extent but it is likely that the people using De Rust will experience negative impacts due to turbine noise (operational phase), and also during the construction phase.</p> <p>Note: Most shareholders of De Rust have invested in the enterprise for its tranquillity and this experience is likely to be significantly degraded if these WTG’s are deployed at the proposed locations.</p>	<p>EAP:</p> <p>WSP acknowledges these comments.</p> <p>This will be further investigated during the EIA phase in the acoustic impact assessment.</p> <p>We confirm that this information has been shared with the acoustic specialist.</p>
<p>De Rust’s water supply</p> <p>All water for the house and staff housing is drawn from a spring just N of the farm’s northern boundary at approximate co-ordinates (decimal degrees) – 25.754225°; 30.129224°.</p> <p>It is essential that any activity, including the development of roads, CWT sites etc. involved in the installation or operation of the project does not compromise either water flow or water quality and safety.</p>	<p>EAP:</p> <p>This comment is acknowledged.</p> <p>Mitigation planning for any new road crossings of watercourses will adhere to the mitigation hierarchy, first seeking to avoid and then minimise any potential impacts on the watercourse.</p>

Nadar, Thirushan

From: Nadar, Thirushan
Sent: Thursday, 16 March 2023 16:11
To: [REDACTED]
Cc: Strong, Ashlea
Subject: RE: Request: Registration as an Interested and Affected Party

Dear [REDACTED]

Thank you for the interest in the Dalmanutha project.

We have added the email address provided to the project database.

Regarding the KMZ, the client is currently in the process of updating and revising them, so details will be shared when the Draft EIAr is sent out for public review.

Lastly, we can confirm that we have shared the email address provided, with the rest of the renewable energy team.

Kind regards



Thirushan Nadar
Consultant

T +27 11 300-6185
[REDACTED]

From: R [REDACTED]
Sent: Thursday, 16 March 2023 05:50
To: Nadar, Thirushan <Thirushan.Nadar@wsp.com>
Subject: Request: Registration as an Interested and Affected Party

Hi Thirushan,

I hope you are well.

We would like to register as an Interested and Affected Party (I&AP) for the proposed Dalmanutha Wind Energy Facility in the Mpumalanga Province. For the registration, please capture this email address: [REDACTED]

Furthermore, could you kindly share the KML files of the proposed development extent and the grid connection corridor route assessed to the nearest ESKOM substation.

Lastly, we would also like to request that WSP registers us as an I&AP for all renewable energy projects. We are continuously developing sites across various Provinces so it would be great to have sight of other projects that we can include in our own stakeholder databases for our projects, as well as take into consideration from a technical perspective.

Looking forward to hearing from you.

Best Regards

[Redacted]
Permitting Specialist

Telephone: [Redacted]
Mobile: [Redacted]
Email: [Redacted]



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