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Established 1952

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Division: Environmental Consulting  
 Your Reference: 3944 Paulputs WEF Amendments  
 Our Reference: 16359  
 Date: 16 July 2020

**ATTENTION: MRS ASHLEIGH VON DER HEYDEN**

Dear Mrs von der Heyden

**VISUAL SPECIALIST COMMENT IN RESPECT OF PROPOSED AMENDMENTS TO THE ENVIRONMENTAL AUTHORISATION FOR THE PAULPUTS WIND ENERGY FACILITY NEAR POFADDER IN THE NORTHERN CAPE PROVINCE.**

- **DFFE Reference No: 14/12/16/3/3/2/1160**

**1. BACKGROUND**

WKN-WindCurrent (hereafter referred to as “WKN”), under the SPV Paulputs WEF (RF) (Pty) Ltd received Environmental Authorisation (EA) for the proposed construction of the 300MW Paulputs Wind Energy Facility (WEF), near Pofadder in the Northern Cape Province. Authorisation was granted on 11<sup>th</sup> December 2019 by way of EA Reference No 14/12/16/3/3/2/1160.

This authorisation made provision for the construction of a total number of 75 wind turbines, each with a maximum hub height of 140m (maximum blade tip height 230 m), one on-site substation (location A) and a 132kV overhead power line (OHPL) (Option C). WKN are however now proposing to amend and split the authorised Paulputs WEF and its associated grid connection into Paulputs North WEF and associated infrastructure and Paulputs South WEF. The approved OHPL and on-site substation options (C and A) will serve the proposed Paulputs North WEF and as such will be absorbed into the Paulputs North WEF and the Applicant will become Paulputs Wind Energy Facility North (RF) (Pty) Ltd.

As the proposed amendments require Environmental Authorisation (EA) from the Competent Authority (CA), Paulputs has appointed Arcus Consultancy Services South Africa (Pty) Ltd (‘Arcus’) as the project manager and Ashleigh von der Heyden as independent Environmental Assessment Practitioner (‘EAP’) to undertake the necessary Part II EA Amendment Applications.

Part of the SiVEST Group SiVEST SA (Pty) Ltd Registration No. 2000/006717/07 t/a SiVEST

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Three Part II amendment applications for Environmental Authorisation (EA) will be submitted to the Department of Environment, Forestry and Fisheries (DFFE), as each WEF and its associated infrastructure will be required to have its own environmental authorisation. Details of each amendment are provided in **Table 1** below.

**Table 1: Proposed Amendment Applications**

<b>A AMENDMENT 1</b>	Project Title	The Proposed Paulputs North Wind Energy Facility and Associated Infrastructure EA Amendment, Northern Cape Province
	Project Information	Paulputs N WEF (up to 150 MW) consisting of 40 turbines (T1 – T40), substation A and associated infrastructure on the north-west side of the N14.
	Project SPV	Paulputs Wind Energy Facility North (RF) Pty Ltd
<b>B AMENDMENT 2</b>	Project Title	The Proposed Paulputs South Wind Energy Facility EA Amendment, Northern Cape Province
	Project Information	Paulputs SE WEF (up to 150 MW) consisting of 35 turbines (T41 – 75) and associated infrastructure on the south-east side of N14.
	Project SPV	Paulputs Wind Energy Facility South (RF) Pty Ltd
<b>C AMENDMENT 3</b>	Project Title	The Proposed Paulputs Grid Connection and Electrical Infrastructure associated with the authorised Paulputs Wind Energy Facility, Northern Cape Province
	Project Information	Paulputs WEF grid connection to be split from the current authorisation for ease of transfer of ownership to Eskom
	Project SPV	Paulputs Wind Energy Facility North (RF) Pty Ltd

In addition, a separate environmental authorisation application is being undertaken in respect of grid connection infrastructure to serve the proposed Paulputs South WEF.

Following on from the Environmental Impact Assessment (EIA) level Visual Impact Assessment (VIA) conducted for the Paulputs WEF, SiVEST has been requested to provide visual specialist comment in respect of the proposed amendments.

## 2. FINDINGS OF THE ORIGINAL VIA

The EIA phase VIA for the Paulputs WEF, completed by SiVEST in July 2019, assessed the potential visual impacts of the proposed WEF layout comprising 75 turbines each with a hub height of 140m and rotor diameter of 180m (i.e. a maximum height of 230m at blade tip). The VIA also assessed associated grid connection infrastructure comprising four (4) OHPL route assessment corridors and three Substation Compound sites. A summary of the key findings of the VIA are provided below.

### 2.1 Visual Character

The VIA for Paulputs WEF identified the visual character of the broader study area as being largely natural with pastoral elements and low densities of human settlement. As such WEF development would alter the visual character and contrast significantly with the typical land use and/or pattern and form of human elements present across the broader

study area. The level of contrast will however be reduced by the presence of the KaXu, !Xina and Konkoonies SEFs, the Paulputs substation and the existing high voltage power lines in close proximity to the Paulputs WEF application site.

## 2.2 Cultural Landscapes

The VIA determined that much of the study area represents a typical Karoo cultural landscape. This is important in the context of potential visual impacts associated with the development of a WEF and associated infrastructure as introducing this type of development could be considered to be a degrading factor in the context of the natural Karoo character of the study area.

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

It should be noted that during the Scoping phase of the EIA, the South African Heritage Resource Agency (SAHRA) provided “Interim Comment” in a letter dated 20 March 2019. One of the issues raised in this letter is SAHRA’s requirement of a 3km buffer between “any turbine placement and a National Road”. It is assumed that SAHRA’s 3km buffer is intended to reduce the visual impacts of the proposed WEF on motorists travelling along the N14 and also reduce the potential impact on the landscape adjacent to the road. In response to this, it was pointed out in the EIA phase VIA that visual impacts are experienced differently by different types of receptors and thus some receptors may not consider a WEF to be a negative visual impact. The VIA further revealed that, as the section of the N14 which traverses the WEF study area does not form part of a designated tourism route, it does not generally experience heavy volumes of tourist traffic. Additionally, low overall traffic volumes were noted during the VIA field visit in November 2018, largely comprising local access traffic and heavy trucks en-route to the Namibian border.

Thus although the turbines will be highly visible to passing motorists, visual impacts will be transient and motorists are unlikely to be adversely affected by the presence of turbines within 3kms of the road. In addition, the 500m buffer recommended in the scoping phase VIA is considered sufficient to mitigate the impacts of shadow flicker.

## 2.3 Visual Sensitivity

Due to the largely natural character of the area, visual sensitivity of the broader study area is rated as low to moderate. An important factor contributing to the visual sensitivity of an area however is the presence or absence of visual receptors that may value the aesthetic quality of the landscape and depend on it to produce revenue and create jobs. No formal protected areas, leisure-based tourism activities or sensitive receptor locations were identified in the study area and relatively few potentially sensitive receptors were found to be present.

A visibility analysis, based on a maximum height of 230m (at blade tip), showed that the site would be visible from all identified potentially sensitive receptors and as such, no areas on the site were significantly more sensitive than the remainder of the site. The main concern from a visual perspective is therefore the direct visual impact of the turbines

on any farmsteads or receptors located on the application site. Accordingly, visual sensitivity is restricted to a 500m exclusion zone around the two receptor locations which lie within 500m of the site boundary and also on either side of the N14 receptor road. The preclusion of turbine development from this zone would reduce the direct impact of the turbines on the occupants of the farmstead, especially those impacts related to shadow flicker.

These areas of visual sensitivity were taken into account in the final turbine layout for the Paulputs WEF.

## 2.4 Potentially Sensitive receptors

It is important to note that visual impacts are only experienced when there are receptors present to experience this impact. The original VIA for this development found that the broader study area is not typically valued for its tourism significance and there is limited human habitation resulting in relatively few potentially sensitive receptors in the area.

A total number of sixteen (16) potentially sensitive receptor locations were identified within 10kms of a turbine placement within the Paulputs WEF layout. None of these receptor locations was considered to be a sensitive receptor and no leisure or nature-based activities were identified in the study area. All of the receptors identified are however farmsteads which are regarded as potentially sensitive visual receptors as they are located within a mostly rural setting and the proposed development will likely alter natural vistas experienced from these locations. It should be noted that the EIA Public Participation Process (PPP) did not bring to light any negative sentiments towards the proposed development on the part of local residents.

According to the impact rating matrix in the VIA report, three (3) of the potentially sensitive receptors would experience high levels of visual impact as a result of the proposed Paulputs WEF development. All of these receptors are farmsteads located in relatively close proximity to the application site and this factor, in conjunction with the relatively flat terrain in the area, gives rise to a high impact rating. None of these receptors are tourism-related facilities however, and as such they are not considered to be Sensitive Receptors. Thus the high impact rating assigned did not affect the overall impact ratings for the proposed development in the original VIA for Paulputs WEF.

The N14 national route was identified in the VIA as a potentially sensitive receptor road as elements of the proposed development would be highly visible to motorists travelling along this route. This section of the N14 however does not form part of a designated tourism route and as such, visual impacts affecting the N14 are rated as moderate.

## 2.5 Cumulative Impacts

Although other renewable energy developments and infrastructure projects, either proposed or in operation, were identified within a 35km radius of the Paulputs WEF application site, it was determined in the VIA that only seven (7) of these would have any significant impact on the landscape within the visual assessment zone. All seven projects are Solar Energy Facilities (SEFs) and three are already in operation. These projects are concentrated in close proximity to Paulputs substation and the surrounding landscape has already undergone noticeable change. The VIA further determined that the concentration of facilities will alter the inherent sense of place and introduce an increasingly industrial character into a largely rural area. This will result in significant cumulative impacts, rated as medium during both construction and operation phases of the project. It is however anticipated that these impacts could be mitigated

to acceptable levels with the implementation of the recommendations and mitigation measures stipulated for each of these developments by the visual specialists.

## 2.6 Overall Visual Impact Rating

The overall impact rating conducted for the proposed Paulputs WEF revealed that impacts associated with the proposed WEF and associated infrastructure will be of moderate significance during construction. This could however be reduced to low with the implementation of mitigation measures. During operation, visual impacts from the WEF would be of moderate significance with relatively few mitigation measures available to reduce the visual impact.

## 2.7 Assessment of Alternatives

Three (3) substation site options and four (4) power lines route options were assessed from a visual perspective in the original VIA and no fatal flaws were identified for any of the substation sites or power line route options.

## 3. SPECIALIST COMMENT

In light of the above, Visual Specialist comments in respect of each proposed amendment is provided below.

### 3.1 AMENDMENT 1

Amendment 1 essentially relates to the establishment of the northern section of the authorised Paulputs WEF as a separate entity. The Facility will be named Paulputs North WEF and the Applicant is Paulputs Wind Energy Facility North (RF) (Pty) Ltd. The original, authorised layout for this northern section of the WEF comprises forty (40) turbines and it is understood that this layout will remain the same. It is however proposed that the turbine specifications stipulated in the original EA for the Paulputs WEF be as follows:

- Increased hub height: from 140m to 180m.
- Increased rotor diameter: from 180m to 220m.

Associated infrastructure will consist of the approved substation and a Battery Energy Storage Facility (BESS).

#### 3.1.1 *Proposed Split of the Authorised WEF*

As there are no changes in the turbine layout, or the positioning of the other authorised elements of the WEF, the proposed split of the authorised Paulputs WEF and the creation of the Paulputs North WEF does not require any further visual assessment.

#### 3.1.2 *Proposed Amendments to Turbine Specifications*

The proposed new turbine specifications would allow for a maximum height (at blade tip) of 290m, some 60m higher than the height currently authorised. The significance of this change from a visual perspective is assessed below.

The increased height as proposed will increase the visibility of the turbines and extend the area from which the turbines will be visible (viewshed). This will be exacerbated by the lack of any natural screening elements in the broader study area resulting from relatively flat terrain and the prevalence of low shrubland vegetation cover. It is however important to note that visual impacts are only experienced when there are receptors present to experience this impact. The original VIA for this development found that the broader study area is not typically valued for its tourism significance and there is limited human habitation resulting in relatively few potentially sensitive receptors in the area. In light of this and given the relatively remote location of the proposed Paulputs North WEF, the extended viewshed will not affect any additional receptors additional receptors within the 10km assessment zone. .

Visual impacts resulting from the larger turbines would be greatest within a 1 to 2km radius, from where the increased height of the structure would be most noticeable. Only two (2) potentially sensitive receptors are less than 2km from a possible turbine placement, these being the farmsteads located on Portion 5 of the Farm Scuit Klip No 92 and Portion 4 of the Farm Lucas Vlei No 93 respectively. The original VIA for Paulputs WEF determined that these receptors would experience high levels of visual impact as a result of the WEF development, largely as a result of their proximity to the nearest proposed turbine placement. Hence the larger turbines as proposed would not increase the impacts experienced by these receptors. In addition, no concerns were raised by the owners of these properties during the Public Participation Process conducted for the Paulputs WEF EIA and it is therefore possible that the proposed development is not perceived in a negative light.

The remaining potentially sensitive receptors are all more than 2kms from the nearest turbine placement and, while the increased turbine height would make the turbines more visible from these receptors, the overall impact is expected to remain largely unchanged from this distance. It should be noted that although the larger turbines may be visible from some farmhouses outside the 10km assessment zone, at this distance it is likely that the turbines will merge to some degree with the surrounding landscape and as such impacts resulting from the increased turbine height will be minimal.

It be noted that the presence of the KaXu, !Xina and Konkoonies SEFs, the Paulputs substation and the existing high voltage power lines in close proximity to the Paulputs North WEF application site has resulted in a significant level of transformation of the natural environment in this area which will reduce the significance of visual impacts resulting from the proposed amendments.

Several turbine placements are within 1km of the N14 National Route and although the larger turbines will be more visible motorists travelling along this route, this section of the N14 does not form part of a designated tourism route and as such, visual impacts will remain as moderate. In addition, visual impacts will be transient and motorists are unlikely to be adversely affected by the presence of turbines as proposed and the 500m buffer recommended in the scoping phase VIA will be sufficient to mitigate the impacts of shadow flicker.

As previously stated, the overall impact rating conducted for the Paulputs WEF VIA revealed that the proposed WEF is expected to have a moderate negative visual impact rating during both construction and operation, with relatively few mitigation measures available. In light of the above comments, the increase in the proposed turbine rotor diameter

will not change this impact rating. Furthermore, no additional recommendations or mitigation measures will be required and all of the mitigation measures set out in the VIA remain valid.

### 3.1.3 *Proposed BESS*

It is understood that the battery technology being considered for the BESS would be Solid-State, Lithium Ion (Li-Ion) batteries and that the battery modules will be housed in containers (similar to shipping containers). These containers will be between 2m to 5m high, 1.5 m to 3 m wide and 7m to 20m long and may be stacked vertically to a maximum height of 10m. The containers will be housed within the authorised substation compound site (Option A) and in close proximity to other elements of the WEF on-site infrastructure.

As the substation compound site was assessed in the original VIA, no further visual assessment is deemed necessary in respect of the proposed BESS. Furthermore, given the height and the location of the containers in relation to the proposed substation and other elements proposed on this site, it is anticipated that the BESS will be perceived as part of the greater WEF development and the visual impact will be relatively minor when compared to the visual impact associated with WEF as a whole. Accordingly, the BESS will not result in any change in visual impacts.

### 3.1.4 *Impact Statement*

It is SiVEST's opinion that the proposed changes to the authorised Paulputs WEF associated with **Amendment 1** do not give rise to additional visual impacts or exacerbate the impacts previously identified in the VIA for this development. Given the low level of human habitation and the relative absence of sensitive receptors in the area, the increased turbine height is deemed acceptable from a visual perspective and the Environmental Authorisation (EA) should be amended. SiVEST is of the opinion that the impacts associated with the construction, operation and decommissioning phases can be mitigated to acceptable levels provided the recommended mitigation measures are implemented.

## 3.2 AMENDMENT 2

Amendment 2 essentially relates to the establishment of the southern section of the authorised Paulputs WEF as a separate entity. The Facility will be named Paulputs South WEF and the Applicant is Paulputs Wind Energy Facility South (RF) (Pty) Ltd. The original, authorised layout for this southern section of the WEF comprises thirty five (35) turbines and it is understood that this layout will remain the same. It is however proposed that the turbine specifications stipulated in the original EA for the Paulputs WEF be as follows:

- Increased hub height: from 140m to 180m.
- Increased rotor diameter: from 180m to 220m.

Associated infrastructure will consist of the approved substation and a Battery Energy Storage Facility (BESS).

### 3.2.1 *Proposed Split of the Authorised WEF*

As there are no changes in the turbine layout, or the positioning of the other authorised elements of the WEF, the proposed split of the authorised Paulputs WEF and the creation of the Paulputs South WEF does not require any further visual assessment.



### 3.2.2 Proposed Amendments to Turbine Specifications

The proposed new turbine specifications would allow for a maximum height (at blade tip) of 290m, some 60m higher than the height currently authorised. The significance of this change from a visual perspective is assessed below.

The increased height as proposed will increase the visibility of the turbines and extend the area from which the turbines will be visible (viewshed). This will be exacerbated by the lack of any natural screening elements in the broader study area resulting from relatively flat terrain and the prevalence of low shrubland vegetation cover. It is however important to note that visual impacts are only experienced when there are receptors present to experience this impact. The original VIA for this development found that the broader study area is not typically valued for its tourism significance and there is limited human habitation resulting in relatively few potentially sensitive receptors in the area. In light of this and given the relatively remote location of the proposed Paulputs South WEF, the extended viewshed will not affect any additional receptors additional receptors within the 10km assessment zone. .

Visual impacts resulting from the larger turbines would be greatest within a 1 to 2km radius, from where the increased height of the structure would be most noticeable. Only one (1) potentially sensitive receptor is less than 2km from a possible turbine placement, this being the farmstead located on Portion 1 of the Farm Lucas Vlei No 93. The original VIA for Paulputs WEF determined that this receptor would experience high levels of visual impact as a result of the WEF development, largely as a result of its proximity to the nearest proposed turbine placement. Hence the larger turbines as proposed would not increase the impacts experienced by this receptor. In addition, no concerns were raised by the owner of this property during the Public Participation Process conducted for the Paulputs WEF EIA and it is therefore possible that the proposed development is not perceived in a negative light.

The remaining potentially sensitive receptors are all more than 2kms from the nearest turbine placement and, while the increased turbine height would make the turbines more visible from these receptors, the overall impact is expected to remain largely unchanged from this distance. It should be noted that although the larger turbines may be visible from some farmhouses outside the 10km assessment zone, at this distance it is likely that the turbines will merge to some degree with the surrounding landscape and as such impacts resulting from the increased turbine height will be minimal.

Several turbine placements are within 1km of the N14 National Route and although the larger turbines will be more visible motorists travelling along this route, this section of the N14 does not form part of a designated tourism route and as such, visual impacts will remain as moderate. In addition, visual impacts will be transient and motorists are unlikely to be adversely affected by the presence of turbines as proposed and the 500m buffer recommended in the scoping phase VIA will be sufficient to mitigate the impacts of shadow flicker.

As previously stated, the overall impact rating conducted for the Paulputs WEF VIA revealed that the proposed WEF is expected to have a moderate negative visual impact rating during both construction and operation, with relatively few mitigation measures available. In light of the above comments, the increase in the proposed turbine rotor diameter will not change this impact rating. Furthermore, no additional recommendations or mitigation measures will be required and all of the mitigation measures set out in the VIA remain valid.



### 3.2.3 Proposed BESS

It is understood that the battery technology being considered for the BESS would be Solid-State, Lithium Ion (Li-Ion) batteries and that the battery modules will be housed in containers (similar to shipping containers). These containers will be between 2m to 5m high, 1.5 m to 3 m wide and 7m to 20m long and may be stacked vertically to a maximum height of 10m. The containers will be housed within the proposed substation compound site (Option C) and in close proximity to other elements of the WEF on-site infrastructure.

The substation compound site (Option C) was assessed in the original VIA and as such, no further visual assessment is deemed necessary in respect of the proposed BESS. Furthermore, given the height and the location of the containers in relation to the proposed substation and other elements proposed on this site, it is anticipated that the BESS will be perceived as part of the greater WEF development and the visual impact will be relatively minor when compared to the visual impact associated with WEF as a whole. Accordingly, the BESS will not result in any change in visual impacts.

### 3.2.4 Impact Statement

It is SiVEST's opinion that the proposed changes to the authorised Paulputs WEF associated with **Amendment 2** do not give rise to additional visual impacts or exacerbate the impacts previously identified in the VIA for this development. Given the low level of human habitation and the relative absence of sensitive receptors in the area, the increased turbine height is deemed acceptable from a visual perspective and the Environmental Authorisation (EA) should be amended. SiVEST is of the opinion that the impacts associated with the construction, operation and decommissioning phases can be mitigated to acceptable levels provided the recommended mitigation measures are implemented.

## 3.3 AMENDMENT 3

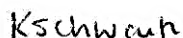
Amendment 3 involves the removal of the Paulputs WEF grid connection from the current authorisation for ease of transfer of ownership to Eskom, and the change of the project applicant to Paulputs Wind Energy Facility North (RF) (Pty) Ltd.

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

## 4. CONCLUSION

In light of the above, it is SiVEST's opinion that the EAs in respect of Amendments 1, 2 and 3 should be granted. SiVEST is of the opinion that the impacts associated with the construction, operation and decommissioning phases of the project can be mitigated to acceptable levels provided the recommended mitigation measures are implemented.

Yours sincerely



Kerry Schwartz  
Visual Specialist  
**SiVEST**



## environmental affairs

Department:  
Environmental Affairs  
REPUBLIC OF SOUTH AFRICA

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

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

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

#### PROJECT TITLE

Proposed Amendment to the Authorised Paulputs Wind Energy Facility near Pofadder, Northern Cape Province.

#### Kindly note the following:

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

#### Departmental Details

##### Postal address:

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

##### Physical address:

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

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

## 1. SPECIALIST INFORMATION

Specialist Company Name:	SiVEST SA (Pty) Ltd			
B-BBEE	Contribution level (indicate 1 to 8 or non-compliant)	2	Percentage Procurement recognition	110
Specialist name:	Kerry Schwartz			
Specialist Qualifications:	BA			
Professional affiliation/registration:	SAGC (GISc Technician)			
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Telephone:	011 798 0632	Fax:	011 803 7272	
E-mail:	kerrys@sivest.co.za			

## 2. DECLARATION BY THE SPECIALIST

I, Kerry Schwartz, declare that –

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

*K Schwartz*

Signature of the Specialist

SiVEST SA (PTY) Ltd

Name of Company:

22 July 2021

Date

Details of Specialist, Declaration and Undertaking Under Oath

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3. UNDERTAKING UNDER OATH/ AFFIRMATION

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

Kschwartz

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Signature of the Specialist

SIVEST SA (PTY) Ltd

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Name of Company

22 July 2021

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Date

**Jacqueline Chantel Jackson**

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Signature of the Commissioner of Oaths  
**COMMISSIONER OF OATHS**

Signature: J. Jackson

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Date

Divisional Controller  
Ref. 9/1/8/2 (R/O) KZN PMB - 08/02/2019

Date: 22/07/2021 Place: PMB  
Business Address: VCC Estate, 170 Peter Brown Drive, PMB