

Proposed Inyanda - Roodeplaat Wind Energy Facility

Addendum to the Final Environ- mental Impact Assessment Report – Draft for Comment

Report Prepared for

Inyanda Energy Projects (Pty) Ltd

Report Number 478867/4

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Report Prepared by

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June 2017

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Inyanda Energy Projects (Pty) Ltd

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List of Abbreviations

DEA	Department of Environmental Affairs (National)
DEDEAT	Department of Economic Development, Environmental Affairs and Tourism
DEIR	Draft Environmental Impact Report
DMR	Department of Mineral Resources
DWS	Department of Water and Sanitation
EAP	Environmental Assessment Practitioner
ECPTA	Eastern Cape Parks and Tourism Agency
EIA	Environmental Impact Assessment
EIR	Environmental Impact Report
EMPr	Environmental Management Programme
FEIR	Final Environmental Impact Report
FSR	Final Scoping Report
IAPs	Interested and Affected Parties
MW	Megawatt
NEMA	National Environmental Management Act
PPP	Public Participation Process
WEF	Wind Energy Facility

Disclaimer

The opinions expressed in this Report have been based on the information supplied to SRK Consulting (South Africa) (Pty) Ltd. (SRK) by Inyanda Energy Projects (Pty) Ltd. SRK has exercised all due care in reviewing the supplied information. Whilst SRK has compared key supplied data with expected values, the accuracy of the results and conclusions from the review are entirely reliant on the accuracy and completeness of the supplied data. SRK does not accept responsibility for any errors or omissions in the supplied information and does not accept any consequential liability arising from commercial decisions or actions resulting from them. Opinions presented in this report apply to the site conditions and features as they existed at the time of SRK's investigations, and those reasonably foreseeable. These opinions do not necessarily apply to conditions and features that may arise after the date of this Report, about which SRK had no prior knowledge nor had the opportunity to evaluate.

1 Background and Introduction

SRK Consulting (South Africa) (Pty) Ltd. (SRK) submitted the Final Environmental Impact Report (FEIR) for the proposed Inyanda - Roodeplaat Wind Energy Facility to the Department of Environmental Affairs in November 2017. DEA has subsequently rejected the FEIR (see Appendix A for a copy of the DEA letter) requiring more detail and/or clarity on a number of items.

This Addendum to the FEIR addresses the concerns raised by DEA. Each comment in DEA's letter is reproduced herein and responses are provided per comment. Where relevant, supporting information is included in appendices.

1.1 Public Participation

This Addendum is being made available for comment, as depicted in Figure 1. This Addendum (excluding Appendices) is being distributed to all registered IAPs and any comments received will be included in the final version of this Addendum, to be submitted to DEA for their consideration. A full version of the Addendum can be accessed as an electronic copy on SRK's webpage via the 'Public Documents' link <http://www.srk.co.za/en/page/za-public-documents>

Printed copies of this report will be available for public review at:

- Uitenhage Public Subscription Library (Caledon Street, Uitenhage); and
- Kirkwood Public Library (Jefferson Ave, Kirkwood).

IAPs wishing to provide comment on this Addendum can do so by sending written comments, within 30 days of the publication of this report, to:

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Email: wmarais@srk.co.za
Fax: (041) 509 4850

Written comment must be received by SRK by **17h00 on 17 July 2017**.

The competent authority that must consider and decide on the application for authorisation in respect of the activities listed in Table 1 is the Department of Environmental Affairs (DEA), as the Department has reached agreement with all Provinces that all electricity-related projects, including generation, transmission and distribution, are to be submitted to DEA, irrespective of the nature of the applicant. This decision has been made in terms of Section 24(C) (3) of the National Environmental Management Act (Act No 107 of 1998).

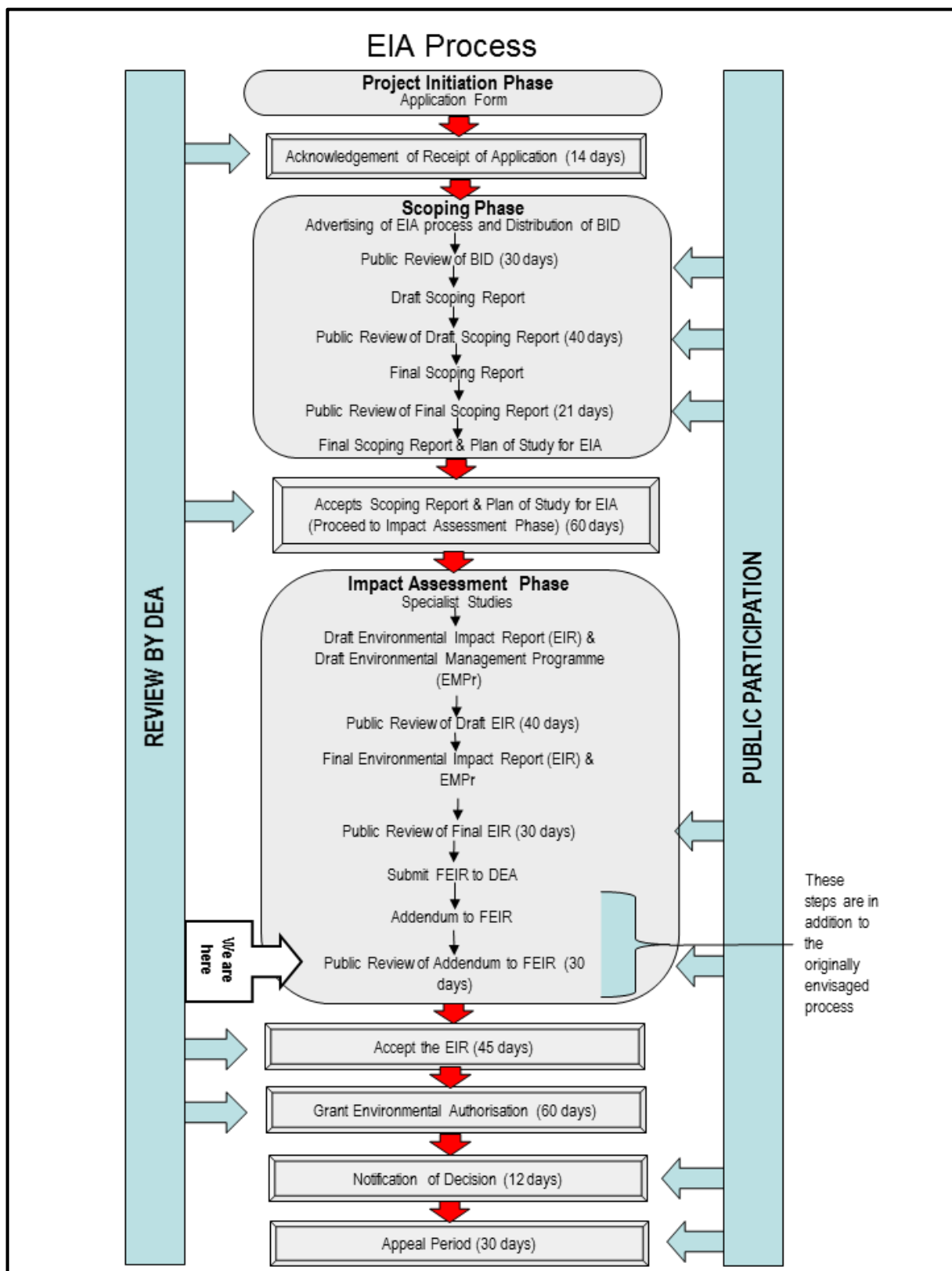


Figure 1: Amended EIA process under the NEMA 2010 EIA regulations

1.2 Listed Activities (according to the April 2017 amendment to the EIA Regulations)

The 2014 revision of the EIA regulations came into effect on 8 December 2014, and an amendment thereof was issued in April 2017. Although the project’s application for environmental authorisation was made under the 2010 EIA regulations, and therefore remains subject to the procedural

requirements thereof, the assessment is also required to take into account all relevant equivalent or additional listed activities in terms of the 2014 EIA regulations, as amended in 2017.

The EIA Regulations lay out two alternative authorisation processes. Depending on the type of activity that is proposed, either a Basic Assessment (BA) process or a Scoping & Environmental Impact Report (S&EIR) process is required in order to apply for an Environmental Authorisation. Listing Notice 1 (GNR 324) lists activities that require a BA process, while Listing Notice 2 (GNR 325) lists activities that require S&EIR. Listing Notice 3 (GNR 327) lists activities in certain sensitive geographic areas that require a BA process.

The activities triggered by the proposed Inyanda - Roodeplaat WEF are listed in Table 1 below and the latest DEA Application form has been amended to reflect these changes (Appendix B).

Table 1: Listed activities potentially triggered by the proposed Inyanda - Roodeplaat WEF

2010 Listed Activities	2014 listed Activities, as amended in 2017	Description of each listed activity as per project description
GNR 544 Item 10: (10) The construction of facilities or infrastructure for the transmission and distribution of electricity – (i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts;	GNR 327 Item 11: The development of facilities or infrastructure for the transmission and distribution of electricity – (i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts	A substation will be constructed on site which will collect power generated by the turbines, step up the voltage to 132 kV, and then transfer this power via an overhead power line to Eskom infrastructure (either a substation or a transmission line).
GNR 544 EIA (11) The construction of: (xi) infrastructure or structures covering 50 square metres or more Where such construction occurs within a watercourse or within 32 metres of a watercourse.	GNR 327 Item 12: The development of (ii) infrastructure or structures with a physical footprint of 100 square metres or more; where such development occurs (a) within a watercourse or; within (c) 32 metres of a watercourse, measured from the edge of the watercourse Excluding – (cc) activities listed in activity 14 in LN 2 of 2014 or activity 14 in LN 3 of 2014, in which case that activity applies	The project will involve upgrades to roads and stormwater infrastructure at watercourse crossings or within 32 m thereof. However, activity 14 of Listing Notice 3 (GN 324) applies so authorisation of this activity is no longer required.
GNR 544 (18) The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock or more than 5 cubic metres from: (i) a watercourse.	GNR 327 Item 19: The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock or more than 10 cubic metres from: (i) a watercourse.	The construction of internal roads between the turbines will not cross any watercourses however the upgrading of culverts and bridges for existing (on-site) gravel roads will involve excavations of material exceeding 10 m ³ . Note that no upgrading of roads outside of the study areas is proposed.
GNR 545 (1) The construction of facilities or infrastructure for the generation of electricity where the electricity output is 20 megawatts or more	GNR 325 Item 1: The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more.	The proposed development would have a power output of up to 187.2 MW.

2010 Listed Activities	2014 listed Activities, as amended in 2017	Description of each listed activity as per project description
<p>GNR 545 (15) Physical alteration of undeveloped, vacant or derelict land for commercial and industrial use where the total area to be transformed is 20 hectares or more.</p>	<p>GNR 325 Item 15: The clearance of an area of 20 hectares or more of indigenous vegetation.</p>	<p>The permanent footprint of the proposed development will be approximately 60 hectares, confirming the applicability of this listed activity.</p>
<p>GNR 546 (2) The construction of reservoirs for bulk water supply with a capacity of more than 250 cubic metres</p> <p>(a) In the Eastern Cape (iii). Outside urban areas in:</p> <p>(aa) National Protected Areas Expansion Strategy Focus Areas</p> <p>(dd) Critical Biodiversity Areas as identified in systematic biodiversity plans</p>	<p>GNR 324 Item 2: The development of reservoirs excluding dams with a capacity of 250 cubic metres (a) In the Eastern Cape (ii) outside urban areas in (aa) National Protected Areas Expansion Strategy Focus Areas</p> <p>(dd)critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans</p>	<p>Temporary water storage capacity of approximately 300 m³ will be required during the construction phase. This temporary storage is likely to be in multiple plastic tanks (as opposed to a single reservoir).</p> <p>Most of the site is identified as a National Protected Areas Expansion Strategy Focus Area.</p> <p>The majority of the site is identified as a critical biodiversity area in terms of at least one systematic biodiversity plan (the Eastern Cape Biodiversity Conservation Plan).</p>
<p>GNR 546 (4) The construction of a road wider than 4 m with a reserve less than 13.5 m.</p> <p>(a) In the Eastern Cape (ii). Outside urban areas in:</p> <p>(bb) National Protected Areas Expansion Strategy Focus Areas</p> <p>(ee) Critical Biodiversity Areas as identified in systematic biodiversity plans</p> <p>(gg) ... 5 km from any protected area identified in terms of NEMPAA.</p>	<p>GNR 324 Item 4: The development of a road wider than 4 metres with a reserve less than 13,5 metres (a) In the Eastern Cape (i)Outside urban areas, in:</p> <p>bb) National Protected Areas Expansion Strategy Focus Areas</p> <p>(ee)critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans</p>	<p>Roads will need to be constructed that will link the turbines and other infrastructure components.</p> <p>Most of the site is identified as a National Protected Areas Expansion Strategy Focus Area.</p> <p>The majority of the site is identified as a critical biodiversity area in terms of at least one systematic biodiversity plan (the Eastern Cape Biodiversity Conservation Plan)</p> <p>The site is within 5 km of the Groendal Wilderness Area.</p>
<p>GNR 546 (10) The construction of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres</p> <p>(a) in the Eastern Cape (ii) outside urban areas, in:</p> <p>(bb) national protected area expansion strategy focus areas</p> <p>(ee) ... Critical Biodiversity Areas as identified in systematic biodiversity plans</p>	<p>GNR 324 Item 10: The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres. (a) in Eastern Cape: i Outside urban areas in:</p> <p>(bb) National Protected Areas Expansion Strategy focus areas;</p> <p>(ee) critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans</p>	<p>During construction the contractor is likely to require a temporary facility for the storage of fuel, probably at the Construction Plant Storage area. Storage of oils (e.g. for electrical transformers), would also be required, and it is likely that the combined storage capacity will be between 30 m³ and 80 m³.</p> <p>Most of the site is identified as a National Protected Areas Expansion Strategy Focus Area.</p> <p>The majority of the site is identified as a critical biodiversity area in terms of at least one systematic biodiversity plan (the Eastern Cape Biodiversity Conservation Plan).</p>

2010 Listed Activities	2014 listed Activities, as amended in 2017	Description of each listed activity as per project description
<p>GNR 546 (12) the clearance of an area of 300 square metres or more of vegetation where 75% of the vegetative cover constitutes indigenous vegetation (a) Within any critically endangered or endangered ecosystem listed in terms of Section 52 of the NEMBA (b) within critical biodiversity areas identified in bioregional plans</p>	<p>GNR 324 item 12: the clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. (a) in Eastern Cape: (ii) within critical biodiversity areas identified in bioregional plans adopted by the competent authority or in bioregional plans</p>	<p>Clearance of indigenous vegetation will amount to more than 60 ha. A number of bioregional plans identify critical biodiversity areas coinciding with the proposed development footprint.</p>
<p>GNR 546 (13) The clearance of an area of 1 hectare or more of vegetation where 75% or more of the vegetative cover constitutes indigenous vegetation.</p> <p>(b) national protected area expansion strategy focus areas</p> <p>(c) In the eastern cape (ii) outside an urban area</p> <p>(bb) national protected area expansion strategy focus areas</p> <p>(ff) ... 5 km from any protected area identified in terms of NEMPAA.</p>		<p>Temporary and permanent clearing of indigenous vegetation in excess of 60 ha will be required.</p> <p>Parts of the site are identified as National Protected Areas Expansion Strategy Focus Areas</p> <p>Most of the site is identified as a National Protected Areas Expansion Strategy Focus Area.</p> <p>The site is within 5 km of the Groendal Wilderness Area.</p>
<p>GNR 546 (14) The clearance of an area of 5 hectares or more of vegetation where 75% or more of the vegetative cover constitutes indigenous vegetation.</p> <p>(a) In the Eastern Cape (i) All areas outside urban areas.</p>		<p>Temporary and permanent clearing of indigenous vegetation in excess of 60 hectares will be required.</p>
<p>GNR546 (16) The construction of:</p> <p>(iv) Infrastructure covering 10 square metres or more where such construction occurs within a watercourse or within 32 metres of a watercourse, measured from the edge of a watercourse.</p> <p>(a) In Eastern Cape: ii. Outside urban areas.</p> <p>(bb) National Protected Areas Expansion Strategy Focus Areas</p> <p>(ff) Critical Biodiversity Areas as identified in systematic biodiversity plans</p>	<p>GNR 324 Item 14: The development of (ii) infrastructure or structures with a physical footprint of 10 square metres or more; where such development occurs (a) within a watercourse; or (c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of the watercourse. (a) in Eastern Cape: (i) Outside urban areas in: (bb) National Protected Area Expansion Strategy Focus areas</p> <p>(ff) critical biodiversity areas identified in bioregional plans adopted by the competent authority or in bioregional plans</p>	<p>A number of internal roads and stormwater infrastructure (exceeding 10 m²) will require upgrading, and in many cases these cross or are within 32 m of watercourses.</p> <p>Most of the site is identified as a National Protected Areas Expansion Strategy Focus Area.</p> <p>The majority of the site is identified as a critical biodiversity area in terms of at least one systematic biodiversity plan (the Eastern Cape Biodiversity Conservation Plan).</p>

2010 Listed Activities	2014 listed Activities, as amended in 2017	Description of each listed activity as per project description
(hh) ... 5 km from any protected area identified in terms of NEMPAA.		The site is within 5 km of the Groendal Wilderness Area.
<p>GNR 546 (19) The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre.</p> <p>(a) In the Eastern Cape: ii. Outside urban areas in:</p> <p>(bb) National Protected Areas Expansion Strategy Focus Areas</p> <p>(ee) Critical Biodiversity Areas as identified in systematic biodiversity plans</p> <p>(gg) ... 5 km from any protected area identified in terms of NEMPAA.</p>	<p>GNR 324 Item 18: The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre (a) In the Eastern Cape (i) Outside urban areas in:</p> <p>(bb) National Protected Area Expansion Strategy Focus areas</p> <p>(ee) critical biodiversity areas identified in bioregional plans adopted by the competent authority or in bioregional plans</p>	<p>Existing farm roads may be widened as part of the development. Existing tracks are generally very narrow and widening thereof is likely to be by more than 4 m to meet the 6 m road width requirement for construction vehicles.</p> <p>Most of the site is identified as a National Protected Areas Expansion Strategy Focus Area.</p> <p>The majority of the site is identified as a critical biodiversity area in terms of at least one systematic biodiversity plan (the Eastern Cape Biodiversity Conservation Plan).</p> <p>The site is within 5 km of the Groendal Wilderness Area.</p>
N/A	<p>GNR 984 Item 21: Any activity including the operation of that activity associated with the primary processing of a mineral resource including winning, reduction, extraction, classifying, concentrating, crushing, screening and washing but excluding the smelting, beneficiation, refining, calcining or gasification of the mineral resource in which case activity 6 in this Notice applies.</p>	<p>It is proposed to crush the excavated material on each platform for use as layer works backfill on that platform.</p> <p>This activity has been removed in the 2017 amendment and replaced by Activity 17, which is limited to instances where a mining right is required. Based on the EAP's discussions with the Department of Mineral Resources (reported on in the EIR), no mining right or mining permit would be required for the crushing of material from the platforms, and consequently authorisation of this activity is no longer required.</p>

2 DEA Comments and Responses

2.1 Avifauna

a) This Department identified that two different avifaunal specialists conducted the avifaunal assessment. These two avifaunal specialists appointed by the Applicant concluded completely different results from the same avifauna pre-construction data analysis; hence resulted in different conclusions and recommendations.

The comment that “*the same avifauna pre-construction data analysis*” was used by both specialists is an apparent misunderstanding of the specialist studies.

The Smallie study based its findings on approximately 40 days of monitoring over a period of 12 months at three vantage points. The Percival study added an additional approximately 51 days of monitoring over a six month period at six vantage points (see page 4, of Percival's Bird Survey Report,

February 2016). The second specialist study (by Percival) is therefore based on more monitoring data covering a wider area and with more frequent monitoring rounds.

The conclusions in the Smallie report are based on qualitative assessment of the risks (see p53 & p57 of Smallie's report), whereas the Percival report is based on quantitative assessment using the Scottish National Heritage Collision Risk Model. Smallie does make reference to this method (p53), and highlights some of the key assumptions that the Collision Risk Model must take into account, including the recommended avoidance rate "based on multiple sources" (p53). While Smallie expresses his doubts about the usefulness of Collision Risk Modelling, Percival has, with the exception of the Black Harrier, used a lower avoidance rate (i.e. higher incidence of collisions) than that recommended in the Scottish National Heritage Collision Risk Model when modelling the impacts (paragraph 79, page 24). This suggests that the method employed by Percival in this assessment is more robust than is usually the case for four of the species modelled.

It is of interest that Percival has performed collision risk modelling with both his data (the data on which his report is based) and the Smallie data and the outputs of the model predict a lower collision frequency if the Smallie data were to be used (see page 24 of Percival's main report), i.e. the additional monitoring conducted by Percival results in a higher predicted collision rate.

With the above in mind, the method employed by Percival and the data on which the results are based, are arguably more robust than those employed by Smallie.

b) Based on the above, this Department requests that the Applicant appoint an independent avifaunal specialist to externally peer review all work undertaken by the two avifaunal specialists and make final conclusions and recommendations on the avifaunal impacts

On the basis that:

- The Department appears to have misunderstood the differences between the two avifaunal studies, as outlined in the previous response; and
- The Percival study was originally intended by the Applicant as a review of the Smallie report (A copy of the Percival review of the Smallie report is included as an appendix to Percival's final report, which was previously presented in the Supplementary Volume of Specialist Studies, distributed with the DEIR);

the Applicant has instructed SRK not to obtain an external review of the avifaunal studies.

c) The specialist appointed to externally peer review the work of the two specialists must comply with the requirements of Regulation 17 of the Environmental Impact Assessment Regulations, 2010.

Based on preceding comment, no response is required.

d) The Environmental Assessment Practitioner (EAP) must liaise with BirdLife SA in the appointment of the independent avifaunal specialist reviewer. BirdLife SA must also be consulted on the Terms of Reference for the study.

Based on preceding comment, no response is required.

e) The abovementioned independent peer review report must be sent to BirdLife SA and the Department's Biodiversity and Conservation unit for review and comment.

Based on preceding comment, no response is required.

f) The EAP must ensure that the independent avifaunal specialist reviewer has access to all the monitoring data (i.e. from the start of the project to date).

Based on preceding comment, no response is required.

2.2 Status of the Road

g) Following a review of the EIAr, the issue concerning whether the road has been constructed illegally or not has been raised by numerous interested and affected parties (I&APs). As such, the applicant, must in consultation with the Eastern Cape Provincial Department of Finance, Economic Development, Environmental Affairs and Tourism, resolve the matter and proceed with any corrective measures if any, and written confirmation from the Eastern Cape must be included in the amended EIAr stating that the matter has been resolved prior to this Department receiving the report for decision-making.

The matter of the road is being dealt with outside of this EIA process and is currently being resolved between the landowner and the Eastern Cape Department of Economic Development, Environmental Affairs & Tourism. A copy of the letter from Rushmere Noach Attorneys, representing the landowner, to the Eastern Cape Department of Department of Economic Development, Environmental Affairs & Tourism, to this effect is attached in Appendix D

h) It is noted that SRK states in the EIAr "that it is difficult to understand how the construction of the road, whether unlawful or not, influences SRK's objectivity. The road has been assessed as part of the broader road network associated with the project and has allowed the legal process to proceed independently of this assessment". As such, based on the assessment conducted, the responsible EAP must confirm whether the road was illegally commenced with or not, based on the assessment done.

This matter is currently being resolved between the landowner and the Eastern Cape Department of Economic Development, Environmental Affairs & Tourism, as per the letter attached in Appendix D.

2.3 EAP and Specialists

i) The application form states that the EAP on the project is SRK Consulting (South Africa) (Pty) Ltd. Based on the definition of the EAP, as defined in Chapter 1 of NEMA, "when used in Chapter 5, means the individual responsible for the planning, management and coordination of environmental impact assessments, strategic environmental assessments, environmental management plans or any other appropriate environmental instruments introduced through regulations;". As such, the application form must be amended and submitted with the amended EIAr to include the correct details of the EAP as per the definition above.

The original application form and EAP declaration give SRK Consulting as the EAP and Rob Gardiner as the contact person. The application form has been amended to list Rob Gardiner as the EAP rather than SRK (see Appendix B).

j) Further to the above, upon review of the EIAR, it states that the EAP is "Project Manager, Environmental Assessment Practitioner: Nicola Rump, MSc, EAPSA, Environmental Assessment Practitioner: Tanya Speyers, BSc Hons, and Project Director and Internal Reviewer: Rob Gardiner, MSc, MBA, Pr Sci Nat.". Based on the above, it is unclear who the actual EAP is based on the definition as described under point d above. As such, this must be clarified and included in the amended application form and EIAR.

The text in the FEIR acknowledges the roles of the different members of the assessment team. The overall accountability of the assessment lies with Rob Gardiner and the application form has been amended reflect this (see Appendix B).

k) The EAP must ensure that all specialists have the same development brief and must assess the entire development as well as its alternatives.

All specialists have assessed the same development brief and that any differences in project descriptions that might exist are not environmentally significant. Copies of statements from specialists confirming this are presented in Appendix C.

l) A proper assessment from all specialists, which fully assesses the entire development and its alternatives, must be provided for in the amended EIAR.

All specialists have confirmed that their assessments are appropriate to the scale and nature of environmental risks and have assessed the development footprint. It is recognised that specialist studies use a combination of desktop analysis and ground-truthing.

All specialists have confirmed that their studies covered the full development footprint and that sufficient fieldwork has been conducted on which to base conclusions, including alternatives. In instances where specialists have recommended additional studies, specialists have confirmed in all such instances that these studies are intended to occur after environmental authorisation (if granted), e.g. during the micro-siting of turbines or pylons. Copies of statements from specialists confirming this are presented in Appendix C.

m) The applicant must in the amended EIAR provide detailed reasons for the change in the EAP as well as the two specialists within the EIA process. The previous EAP and specialists must also provide written responses to the reasons provided by the applicant.

The reasons for the change in EAP were given in Item 4 of Rushmere Noach's letter that was included in Appendix E5(iii) in the FEIR, which is in the public domain. Notwithstanding this, the EIA regulations do not prohibit the changing of an EAP during the course of an EIA process.

In terms of the change in specialists, SRK approached the original ecological specialist to continue working on the project, and that specialist declined.

The Applicant commissioned an independent review of the first bird specialist's monitoring report and that review found that, amongst other items, that the first bird specialist did not meet the BirdLife SA monitoring requirements. The Applicant then opted to extend the appointment of the reviewer to conduct additional vantage point surveys and to then complete the impact assessment.

The previous EAP, original ecological specialist, and original bird specialist, are aware of this project but have not registered as IAPs, nor have they submitted comments on the various reports which are all freely available in the public domain.

n) All specialists must ensure that they provide reasons and effectiveness of each mitigation measure they propose and the EAP must provide proof that these recommendations by the specialist is adhered to in the EIAr. Should there be any deviations, then the EAP must justify and give adequate motivations for the deviation.

There doesn't seem to be any instance where the recommendations of specialists (who did the assessment of impact reports, as opposed to baseline assessments) have not been carried forward as specified here.

As a matter of course, consideration is given to the effectiveness of each mitigation measure during the EAPs review of each specialist study, particularly to understand whether proposed mitigation measures are likely to result in the specialist's predicted significance rating. An assessment of the reasons for, and the effectiveness of, mitigation measures is therefore inherent in the process of compiling the EIR.

The EAP is of the understanding that this comment is more pertinent to mitigation measures proposed by the second Avifaunal specialist (Percival), in particular habitat modification. Dr Percival has made extensive comments in support of his proposed mitigation measures, including in his statement attached in Appendix C-4.

o) It is noted that the palaeontological specialist states that he faced difficulty to fully assess the entire proposed powerline route, due to lack of access to the site. It is unacceptable to provide a report, which has not fully assessed the site, as this may lead to gaps in information, inaccurate conclusions and recommendations.

Although direct access was not possible for the assessment of a section of a power line route crossing a game farm, the Palaeontologist explored an alternate transect across the plain along the Krompoort road in order to assess the nature of Kirkwood Formation strata crossing the plain (vlakke). The Palaeontologist was of the view that this was representative of the site, as is confirmed in his statement attached in Appendix C-2.

p) The EAP must confirm with all the other specialists whether they experienced similar problems regarding access due to locked gates. All specialists must assess the entire development site, with all proposed alternatives, and the EAP is to ensure that access to the site is obtained.

Specialists have assessed the entire development site with all proposed alternatives through a combination of desktop assessment and direct inspection. All specialists have confirmed that sufficient fieldwork was conducted on which to base the conclusions in their respective reports and have made declarations regarding access to the site. Statements to this effect are presented in Appendix C.

2.4 Preferred Layout

q) The project description states that the WEF will consist of 52 turbines, but the technical details provided for the WEF states that the WEF would consist of between 46 to 52 turbines. No alternate layout was provided to indicate a 46-turbine project. As such, the amended EIA must assess in detail the two proposed layouts, and each specialist must provide a detailed assessment as well as mitigation measures for each layout. Furthermore, the EAP as well as the specialists must provide recommendations on their preferred layout.

The EIA and the Application for Authorisation is for a wind farm of 52 turbines. At the time of writing the FEIR the applicant had the view that some of the turbines applied for might not be developed. However, the application for 52 turbines remains and DEA is requested to make a decision on the 52 turbine layout.

Recognising that the assessment of alternatives is a requirement of the EIA regulations, it is noted that the assessment of layout alternatives is not prescribed. Specialists have commented on the impacts associated with the proposed layout and in instances (e.g. bat specialist) have made recommendations that are dependent on layout.

2.5 Ecology

r) Following a review of the ecological report, the following limitations and recommendations are noted:

It is recognised that this comment quotes the assumptions and limitations recorded by the specialist. The text below highlights some important considerations for each of these.

- This assessment is an update of the existing ecological work on the site, rather than an exhaustive study;

The ecological specialist (Ms De Wet) has confirmed (see Appendix C-6) that her assessment was additional work and built on the work already conducted by the previous ecological specialist (CES). The two reports together form a comprehensive assessment for the requirements of the EIA and provide adequate information to rate impacts for the proposed development. The specialist has included this limitation as a standard statement in order to indicate that the two reports are to be read together (eliminating the need to reproduce the entire CES report within the additional report) and to ensure that the report is not mistaken as a complex scientific study.

- Species of Conservation Concern are present on site, a full list of these species can only be generated through an assessment specifically designed to do so;

Both Ms De Wet's report and the CES include a version of this limitation, i.e., that all species of special concern can only be identified through monitoring over the whole seasonal cycle. The two specialists conducted site assessments at different times of the year (CES study included a site visit from 19-23 May 2014, and Ms De Wet's from 29 January 2016 to 3 February 2016). Importantly, Ms De Wet concludes that her study "allowed for the production of a species list representative of the entire study area" (p 8 of her specialist study report).

Ms De Wet has clarified (Appendix C-06) that an additional study is needed to produce a comprehensive species list, and a comprehensive list of Conservation Important Species. Such an additional study would be conducted after the EIR is approved and prior to construction and be for the purposes of ensuring that all relevant permits are obtained before the removal, destruction or clipping of any protected species on any relevant lists including national and provincial lists. This approach is widely adopted.

Ms de Wet further clarified that additional studies are recommended only to add to the body of scientific knowledge on the impacts of wind energy facilities, or the general area (such as the case of the ghost frog). These recommended studies are not required for the EIR, nor for any further submissions to DEA, funders or stakeholders.

In the case of the power line assessment, recommendations for further studies relate to changes in the power line routes being assessed in the field. However, work currently done is sufficient to rate the impacts for the power line options presented in the EIR.

- Impacts are assessed based on the current (52) turbine layout, any changes to this layout will result in a need for an update to this assessment.

Both Ms De Wet's report and the CES report include a version of this limitation. This limitation does not imply that certain layouts or alternatives have been excluded from the assessment, but limits the conclusions to the layout in the specialist report. Ms De Wet has confirmed (Appendix C-6) that she has evaluated the layout presented in the FEIR.

- Powerline impacts are assessed based on desktop information.

Ms De Wet's report includes a recommendation for an optional flora and fauna study of the three powerline routes. She has clarified (Appendix C-6) that adequate fieldwork and site visits were conducted to be able to assess the impacts of the proposed WEF on the terrestrial biodiversity of the project area and surrounds.

- Whilst a list of possible mitigation measures are provided, the ecological assessment also recommends that a further assessment is required.

A number of optional additional studies are recommended in Ms De Wet's report. The recommendation of a ground-truthing site visit is consistent with similar studies prior to construction (and after environmental authorisation) to support a permit application to remove or destroy protected plants (comment addressed in more detail above).

As such, all these limitations must be addressed in the amended EIAr and all additional studies must be conducted prior to any decision on the application can be made. As such, the ecological assessment must assess all layouts and alternatives provided in the EIAr.

Commented on above.

s) The Department requests that the ecological specialist report be peer reviewed by an external ecological specialist.

It is noted that this a request and consequently it is assumed to not be the basis for rejection of the EIR.

t) Based on the recommendations of the current ecological specialist report, the applicant must enter into a Conservation Management Agreement with the relevant authority to allow for assurance of the conservation of the site. This agreement must be finalised and included in the amended EIAr. Should the applicant not be willing to enter into any agreement, then the mitigation hierarchy must be considered.

This was listed as an optional mitigation measure in the ecological report.

Please take note of the comment from ECPTA (Minutes of meeting with the ECPTA, 13 May 2016, in Appendix E3 of the FEIR) that it would not enter into any such negotiations or agreements prior to an Environmental Authorisation being issued.

2.6 Heritage and Archaeology

u) The archaeologist states that the possible upgrading, resurfacing, and/or rehabilitation of external gravel access roads and associated borrow pits is outside the scope of this Environmental Impact Assessment process and has not been assessed. This statement cannot be true as the EAP has applied for the construction and upgrading of existing roads. The specialist further stated that if the need to upgrade external roads or open a borrow pit is identified at a later stage, then a Phase 1 Archaeological Impact Assessment may be required in terms of the National Heritages Resources Act. This indicates that a proper assessment has not been conducted. The EAP needs to ensure that a proper assessment is conducted during the EIA process, as well as by all other specialists.

The archaeologist is correct that work on external roads is outside the scope of this EIA and associated application. However, the project includes the construction of a number of new roads, AND the upgrading of a number of existing roads, within the study area. The roads that form part of the application, and which have been assessed by the relevant specialists, are depicted in maps (Appendix F of the FEIR) and coordinates are provided (Appendix H of the FEIR).

The applicant has applied for permission, and obtained approval, from the Department of Roads and Public Works for upgrading of existing provincial roads within the study area (and as depicted on the maps in Appendix F of the FEIR).

v) The heritage specialist recommends that an archaeological walk-through must be conducted for the final powerline route chosen out of the three alternatives when the positions of the pylons are known. Based on the above, the Department recommends that the heritage assessment must assess the entire wind farm development, as well as the powerline route alternatives.

It is noted that this is a recommendation and consequently assumed this is not the basis for rejection of the EIR.

It may be useful to take into consideration that the footprint of a pylon is extremely small in comparison with that of a powerline corridor. It is both impractical and unnecessary (based on the environmental risk identified by the specialist) to assess the whole of the powerline route (and the alternatives). In

addition, a walkthrough of the powerline route by an archaeologist has been a condition of at least one other environmental authorisation and is a pragmatic way of managing effort and environmental risk.

The archaeologist has confirmed that her fieldwork is sufficiently representative of the site to be able to draw conclusions and recommendations in her report (see Appendix C-1).

2.7 Powerline

w) The EAP states that the specialists prefer alternative powerline route 2 over the preferred as indicated in the EIAr. It is indicated that the preferred alternative is selected due to the cost to build alternative powerline route 2. Due to the limitations posed by the various specialists, the Department does not agree with the recommendation of the EAP, and the EAP and specialists in the amended EIAr must provide a proper assessment and recommendations on all alternatives.

The EIA report states that

“Although many specialists favour Option 2, it is noted that this preference is relatively marginal, and none of the specialists raised specific concerns relating to the “preferred” route (which was also preferred by the ecological specialist). It is therefore SRK’s conclusion that based on the information currently available development of Option 2 (the longest and therefore most costly route) would not be merited, over the “preferred” route.”

For clarity, “preferred route” in this extract refers to the technically preferred route, i.e. not the environmentally preferred route (as environmental preference in this instance is considered to be marginal, and none of the specialists highlighted any major concerns relating to the technically preferred route).

2.8 World Heritage Site

x) The EAP must obtain comments from the Directorate: World Heritage Management; Biodiversity and Conservation, and Protected Areas Management within the DEA as well as Birdlife South Africa. These comments must be included in the amended EIAr.

Comments from Birdlife South Africa on the FEIR and preceding reports have been obtained, and are included in Section 4.2.2 and Appendix E1 of the FEIR, as well as the corresponding sections in the FSR.

The Directorate: World Heritage Management; Biodiversity and Conservation, and Protected Areas Management, are both departments within DEA and it was the EAP’s expectation that DEA would have either highlighted the requirement for direct engagement with these Directorates when accepting the scoping study, or to have asked for such comment internally in reviewing either of the Draft or Final EIRs. In the latter case, SRK would attempt to provide clarity on any comments from these Directorates during DEA’s decision making stage. It is the EAP’s understanding that DEA will request comments internally from these Directorates and submit these comments to SRK as part of the comment period on this Addendum.

An inherent assumption in the public participation process is that comments received are representative of stakeholders with similar interests who might not have commented, and by extension it is assumed that other government conservation bodies would have similar concerns/comments to those raised by ECPTA & DEDEAT.

y) Further to the above, the EAP must adequately assess, via the relevant specialist studies, the impact of the proposed development on the World Heritage Site as well as on the wilderness areas. The Department also requires comment from UNESCO, and must indicate how does the use of renewable energy in world heritage sites impact the site, and what types of renewable energy developments for what purpose is allowed.

The FEIR and specialist studies explicitly refer, where appropriate, to the World Heritage Site, including in the impact statement. Clarity is required on what specific elements DEA believe are not adequately addressed.

It is the EAP's understanding that the DEA Directorates listed above will respond on this topic.

2.9 Bats

z) The bat specialist states that all turbines must be positioned outside high sensitivity areas and their respective buffers. Based on the layout plan provided, this has not been done by the EAP. As such, the layout plan must be amended to include the recommendations made by all specialists.

The first of the bats specialist's assumptions & limitations is that *"Distribution maps of South African bat species still require further refinement such that the bat species proposed to occur on the site (that were not detected) are assumed accurate. If a species has a distribution marginal to the site it was assumed to occur in the area. The literature based table of species probability of occurrence may include a higher number of bat species than actually present."*

Numerous other limitations to the method are described, all pointing to the general acceptability of the method, and the difficulty of providing accurate data of the occurrence of bat species and their behaviour on the site. It has been confirmed that this approach is acceptable.

All but three bat species identified as potentially occurring on site have a conservation classification of "least concern". The three exceptions have a conservation classification of "near threatened" and two of these have a likely risk of impact of "low". Of these three, two have a conservation classification of "least concern" and one (*miniopterus natalensis*, natal long fingered bat) is classified as "near threatened". The buffer zones and bat sensitive areas don't differentiate between species or conservation status.

The sensitivity maps generated by the bat specialist (Animalia) are based on features or habitat for species that were identified, or are considered probable, on-site, and are based on the 2014 Guidelines¹ (the latest version at the time of the study). It has been confirmed by that the delineation of bat sensitive areas identified by the bat specialist are valid. It is however noted that in terms of the latest (2016) Guidelines² the 150 m buffer previously proposed around moderately bat sensitive areas should be increased to 200 m and buffer distance should apply to the rotor sweep area (as opposed to the location of the turbine tower). The 350 m buffers proposed for highly bat sensitive areas remain unchanged.

The FEIR has recorded the findings of the bat specialist (Animalia), including recommendations regarding the placement of turbines, however the Applicant has opted not to amend the turbine layout

¹ South African Good Practice Guidelines for Surveying Bats at Wind Energy Facility Developments - Pre-construction 3rd Edition (Sowler & Stoffberg, 2014).

² South African Good Practice Guidelines for Surveying Bats at Wind Energy Facility Developments - Pre-construction 4th Edition (Sowler *et al.*, 2016).

accordingly as recorded in the FEIR. As such, the predicted significance of the negative impact on bats due to collisions and barotrauma during operation of the proposed WEF would remain high in the absence of the mitigation measures recommended by the specialists.

2.10 Socio-economic

aa) The socio-economic impacts on surrounding property value and land-use, which was raised, must be adequately assessed in the amended EIAr by a suitably qualified specialist.

The scope of work outlined in the final scoping report, and the letter of acceptance of the final scoping report, did not specify the need for an assessment of property value and consequently this is not addressed in the EIR.

2.11 Water Source

bb) The department must be provided with proof that the boreholes are licensed and that it has sufficient water for the construction phase of the development seeing that it is the major source of water on site.

The current boreholes are utilised for normal domestic and agricultural use and it is understood that the volumes currently abstracted are below the threshold requiring a water use license.

Licensing for the purposes of the construction of the windfarm would require a license for industrial use. DWS have not expressed concerns regarding the borehole licensing during the course of the EIA process and the preparation of a Water Use License is currently underway.

cc) The EAP must provide a copy of the approved Water Use License for the project to the Department.

As is typically the case for most environmental impact assessments, including renewable energy environmental impact assessments, Water Use Licensing for the project would only be obtained following receipt of an Environmental Authorisation.

2.12 Need and Purpose

dd) Written confirmation from the relevant off taker as well as comments from Eskom must be provided in the amended EIAr.

The Applicant has entered into Non-Disclosure Agreements with potential off-takers and is unwilling to make this information available.

The need for renewable energy is well established and from an environmental perspective requires no motivation. The economic viability of the project is dependent on being able to sell the power and it is reasonable to assume that the project would only commence if investors are satisfied that an off-taker has been secured.

2.13 Activities

- ee) Following a review of the application form and the EIAr, the following must be attended to:
- Item 2 of GNR 546 and Item 2 of GNR 985: the applicability of these activities are not clear. The amended EIAr must clearly indicate the applicability of these activities and a proper assessment must be conducted;
 - Item 10 of GNR 546 and Item 10 of GNR 985: there are no proper specifications provided in the EIAr, and the amended EIAr must include a proper assessment of all impacts associated with these activities;
 - Item 21 of GNR 984: clarification on why the DEA is considered to be the Competent Authority for this activity must be provided.

Table 1-2 of the FEIR lists all relevant listed activities applied for, and includes an explanation on the applicability of each listed activity to the project and where in the report the impacts and mitigation measures relating to each listed activity are addressed. Below are some further considerations:

- Item 2 of GNR 546 and Item 2 of GNR 985 (relating to storage of water in reservoirs): the main impacts associated with this activity relate to clearing of vegetation and associated ecological impacts for placement of water storage tanks. This area is included in the construction footprint area that has been assessed.
- Item 10 of GNR 546 and Item 10 of GNR 985 (relating to storage and handling of dangerous goods): Specifications of the specific storage containers that will be used by the contractors are not known at this stage, and the design criteria for storage of dangerous goods are already regulated, so further description of these has been considered superfluous. Management measures to address potential leaks, spills and waste management are included in the FEIR.
- Item 21 of GNR 984 (relating to the processing of minerals): The outcome of the discussion held with DMR relating to this activity was presented in the FEIR in Table 1-2 and in appendix E3. The DMR explained that they were not the competent authority as the Roodeplaat WEF development is not part of a mining operation, and DMR authorisation would therefore not be necessary in respect of the on-site crushing and screening of material for the use as fill during the construction phase.

Subsequently to the issuing of the FEIR, this listed activity has been removed and re-worded in the 2017 amendment to the EIA regulations, with the result that it (or any similar listed activity) is no longer triggered by the proposed development. It is therefore assumed that further liaison with DMR on this issue is no longer required.

- ff) The following information must form part of the EIAr as well as a separate document for ease of reference:
- An amended application form with an indication of all the 2010 listed activities that are still listed and this must specify the relevant sub listed activities;
 - An indication of all the similarly listed 2014 activities and this must specify the relevant sub listed activities;
 - An indication if there are any new 2014 activities that are listed;
 - An indication where in the report all the 2014 activities have been assessed and mitigated for; and,
 - A letter/affidavit from the EAP indicating that the above is true and correct.

Both the 2010 and 2014 (similar and new) listed activities were included in Table 1-2 the FEIR, which also indicates where in the report the impacts relating to each listed activity are addressed and mitigation measures provided. This table has subsequently been updated to reflect the 2017 changes to the 2014 EIA regulations and is provided as Table 1 of this Addendum, a copy of which is also provided in an amended application form, a copy of which is attached as Appendix B.

gg) Please note that the Department's application form template has been amended and can be downloaded from the following link <https://www.environment.gov.za/documents/forms>.

The latest template has been used for the amended application form.

2.14 Public Participation Process

hh) The EAP must ensure that all concerns raised in the EIA process have been adequately addressed in the amended report.

It is the EAP's view that the requirements of the regulations and best practice have been adhered to in the recording of, and responding to, IAP comments in the FEIR.

ii) The amended EIAR must include a comments and response report as per the requirements of the Regulations. For ease of reference, please see Annexure 1.

The format of a comments & response report is not specified in the EIA regulations. Recognising that the EIA process can only address issues, and not positions (e.g. statements such as "I object"), emphasis in the comments and response table is on issues. Notwithstanding this, all submissions are included in their entirety in appendices to the relevant reports (FEIR, DEIR, FSR and DSR).

The format of the comments and response report has already once been amended (for the FEIR) as per the department's instruction to not group authority comments according to issues but rather per commentator. Considerable time and effort was previously spent in amending this to the requested format. The EAP is unsure if the Department's most recent comment (ii) refers to the comments and responses by other IAPs and if so what difference an alternative format will make to the reading of this section and whether this applies to comments on the DEIR or previous reports.

jj) The EAP must provide the exact comment provided by a specific interested and affected party in the comments and response report and address the respective comment before moving to the next comment. The EAP is not to break down and categorise the comments raised by various individuals.

Due to the volume of comments received and the repetitive nature of the comments, the manner in which comments have been recorded and summarised was deemed by the EAP to be the most reasonable way to present the issues. To break down the table would simply duplicate many comments and responses. Notwithstanding this, all submissions are included in their entirety in appendices to the relevant reports (FEIR, DEIR, FSR and DSR).

kk) The amended EIAR must include all responses made by the EAP to the representations, comments and views raised by registered interested and affected parties (I&APs).

It is confirmed that all responses by the EAP to IAPs are recorded in the various comments & response tables.

2.15 Cumulative Impacts

II) Should there be any other similar projects within a 30 km radius of the proposed development site, the cumulative impact assessment must be refined to indicate the following:

- Assessment of cumulative impacts of all identified impacts.
- 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.
- 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.
- The cumulative impacts significance rating must also inform the need and desirability of the proposed development.
- A cumulative impact environmental statement on whether the proposed development must proceed.

SRK has consulted the latest available version of the Renewable Energy EIA applications map³, and it is the EAP's understanding that no authorised or proposed Wind Energy Facilities occur within 30 km of the wind turbines assessed associated with the Inyanda-Roodeplaat WEF (measured from the proposed turbine locations). An updated map showing the locations of these facilities relative to the proposed development is provided as appendix G.

Comment provided by relevant specialists relating to cumulative impacts is provided in the FEIR.

2.16 General

mm) The assessment of impacts, the environmental impact assessment process and the requirements of the public participation process (PPP) must be in accordance with Regulations 54 to 57 of GN R. 543 of the EIA Regulations, 2010.

All relevant requirements of the EIA regulations, 2010, have been followed.

nn) The EIAR must meet the requirements of the acceptance of the SR letter, this rejection letter and the requirements of Regulation 31 of the EIA Regulations, 2010.

Detail of how the requirements of the acceptance of the SR letter have been addressed were provided in the cover letter to DEA accompanying the DEIR, attached as Appendix H. This Addendum outlines how the requirements stipulated in the rejection letter of the FEIR have been addressed.

³ Available for download from:

<https://dea.maps.arcgis.com/apps/webappviewer/index.html?id=b8452ef22aeb4522953f1fb10e6dc79e>

3 The Way Forward

The public participation process conducted as part of the EIA process have IAPs the opportunity to assist with identification of issues and potential impacts, and to comment on the findings of the specialist studies and the Environmental Impact Report.

This Addendum to the Final EIR (excluding Appendices) is being distributed to all registered IAPs and any comments received will be included in the final version of this Addendum, to be submitted to DEA for their consideration. A full version of the Addendum can be accessed as an electronic copy on SRK's webpage via the 'Public Documents' link <http://www.srk.co.za/en/page/za-public-documents>

Printed copies of this report will be available for public review at:


- Uitenhage Public Subscription Library (Caledon Street, Uitenhage); and
- Kirkwood Public Library (Jefferson Ave, Kirkwood).

IAPs wishing to provide comment on this Addendum can do so by sending written comments, within 30 days of the publication of this report, to:

Wanda Marais
 SRK Consulting
 PO Box 21842, Port Elizabeth, 6000
 Email: wmarais@srk.co.za
 Fax: (041) 509 4850

Written comment must be received by SRK by **17h00 on 17 July 2017**.

Prepared by:

SRK Consulting - Certified Electronic Signature

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Rob Gardiner MSc, Pr Sci Nat
 Partner, Principal Environmental Scientist

All data used as source material plus the text, tables, figures, and attachments of this document have been reviewed and prepared in accordance with generally accepted professional engineering and environmental practices.

Appendices

Appendix A: DEA Rejection of FEIR

Appendix B: Amended EIA Application Form

Appendix C: Specialist Correspondence

Appendix C-1: Clarity provided by the Archaeology specialist

Appendix C-2: Clarity provided by the Palaeontology specialist

Appendix C-3: Clarity provided by the Agricultural specialist

Appendix C-4: Clarity provided by the Avi-Faunal specialist

Appendix C-5: Clarity provided by the Bat specialist

Appendix C-6: Clarity provided by the Ecological specialist

Appendix C-7: Clarity provided by the Hydrology specialist

Appendix C-8: Clarity provided by the Noise specialist

Appendix C-9: Clarity provided by the Visual specialist

Appendix C-10: Clarity provided by the Socio-Economic

Appendix D: DEDEAT correspondence regarding illegal road

Appendix E: Site Map of Illegal Road and Internal Road required for WEF

Appendix F: Water Use License for road crossings

Appendix G: Map showing distance to other Wind Energy Facilities

Appendix H: Covering Letter to DEIR submitted to DEA

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N Dweni	Department of Water & Sanitation	7	13 June 2017	R Gardiner
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