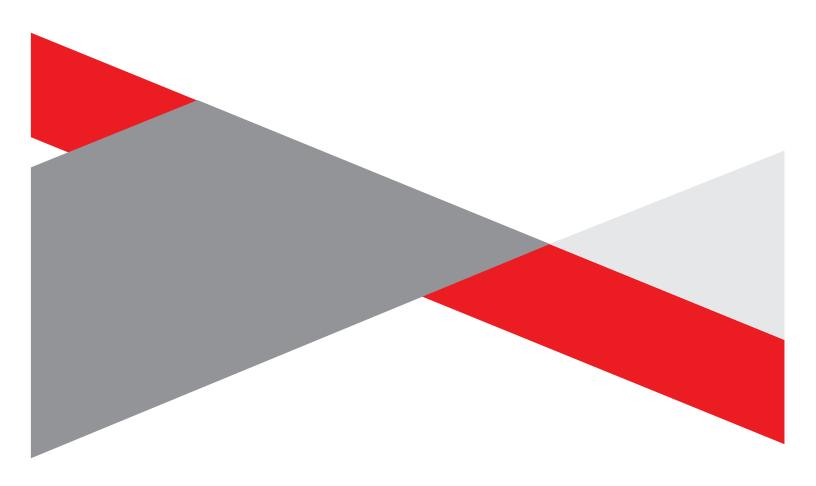
APPENDIX C7 COMMENTS RECEIVED





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

DFFE Reference: 14/12/16/3/3/1/2723 Enquiries: Trisha Pillav

Telephone: (012) 399 9406 E-mail: TPillay@dffe.gov.za

Ms Nkhensani Masondo Savannah Environmental (Pty) Ltd PO Box 148 **SUNNINGHILL** 2157

Telephone Number: (011) 656 3237

Email Address: nkhensani@savannahsa.com

PER E-MAIL

Dear Ms Masondo

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED 240MW ABERDEEN WIND ENERGY FACILITY 2 WEST OF THE TOWN OF ARBEDEEN WITHIN THE DR BEYERS NAUDE LOCAL MUNICIPALITY IN THE EASTERN CAPE PROVINCE

The Draft Basic Assessment Report (BAR) dated March 2023 and received by this Department on 10 March 2023, refers.

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

(a) Specific Comments

- The co-ordinates in the BAR must be specific to each activity and infrastructure that is proposed on the site. The co-ordinates for substations and the Battery Energy Storage Systems must be included in the final BAR, i.e., we require that you provide us with the specific development footprints for each development parameter, and not an area outlining the entire site.
- (ii) Please provide a detailed description as well as any associated assessments related to the technology required for the Battery Storage System (BESS).
- (iii) Please provide a concise, but complete, summary and bullet list of the project description and associated infrastructure (or project scope) to be included in the decision (or as it should appear in the decision), should a positive Environmental Authorisation be granted. This must include a list of all development components and associated infrastructure.
- (iv) According to the Avifaunal Specialist Report (Appendix F), the high-risk areas (class 5.5 and above) displayed in Figure 17 must be regarded as no-go areas, however one wind turbine located furthest towards the north-western section of the site seems to be encroaching into the high-risk area. The wind turbines on the layout plans in the Avifaunal Specialist Report are not numbered therefore making it difficult to reference the exact placement of the wind turbine that seems to be encroaching into the highrisk area. Kindly revise Figure 17 in the Avifaunal Specialist Report to reflect sequentially numbered wind turbines which will aid in future referencing. In addition, the layout plan must be amended to illustrate the adjusted location of the one turbine that is encroaching the high-risk area as identified in Figure 17 of the Avifaunal Specialist Report. Caution should be applied for wind turbines located in close

- proximity to avifaunal no-go areas to ensure that the full blade length of the wind turbines do not encroach into any pre-defined sensitive areas.
- (v) The generic Environmental Management Programme (EMPr) for the substation, Part B Section 2 is incomplete in the draft BAR. The generic EMPr must be signed by the applicant as required by 7.3. The reason provided by the EAP that "This declaration will be signed by the proponent/applicant/holder of the EA once the contractor is appointed and has provided inputs to this Generic EMPr as per the requirements of this template." is not accepted. Please take note failure to submit all the required information that forms part of the generic EMPr will be regarded as non-compliance. We request that you adequality complete all applicable sections in the generic EMPr.
- (vi) The Stormwater Management Plan for the Aberdeen Wind Facility 2 included in the EMPr prepared by SRK Consulting is illegible. Please include a clear copy of the SWMP in the final BAR.
- (vii) The Site Sensitivity Verification Report (SSVR) (Appendix P) omitted one of the specialist assessments identified by the screening tool, namely the Geotechnical Assessment. Kindly include the requirement of this assessment in the SSVR and provide a motivation as to why this specialist assessment was not done.
- (viii) Comments must be obtained from this Department's Biodiversity Conservation Directorate at BCAdmin@dffe.gov.za.

(b) Listed Activities

- (i) The listed activities applied for in the application form and the draft BAR have been quoted incorrectly, as they do not correlate with the listed activities in the EIA Regulations 2014, as amended. The following discrepancies were noted with regards to the activities applied for in the application form and the draft BAR:
 - ➤ "Activity 12 (xii)(a)(c) of Listing Notice 1"- These sub activities have been changed with the recent amendments to the EIA Regulations made in 2017. The Activity should be referenced as "Activity 12 (ii)(a)(c) of Listing Notice 1".
 - "Activity 19 (i) of Listing Notice 1"- This sub activity has been changed with the recent amendments to the EIA Regulations made in 2017. The Activity should be referenced as "Activity 19 of Listing Notice 1".
 - ➤ "Activity 18 (i)(ii)(aa) of Listing Notice 3"- Is quoted incorrectly and failed to apply for the applicable province (Eastern Cape) the activity occurs within. Furthermore, the sub activity (aa) refers to "A protected area identified in terms of NEMPAA, excluding conservancies" and this does not correlate to the description provided in the report and application form. The Activity should be quoted as "Activity 18 (a) (i)(ii) of Listing Notice 3"
 - Kindly ensure all activities applied for in the application form and the final BAR are applicable to the proposed development and are quoted correctly as per the EIA Regulations 2014, as amended.
- (ii) Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description. Only activities applicable to the development must be applied for and assessed.
- (iii) Please ensure that all relevant listed activities and sub-activities are correctly numbered as per the relevant listing notices.
- (iv) The EAP must clearly identify and provide a final list of all applicable listed activities. If any activities are to be removed, motivation for their removal must be included in the final BAR.
- (v) The listed activities represented in the final BAR and the application form must be the same and correct.
- (vi) If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link https://www.dffe.gov.za/documents/forms.
- (vii) The final BAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.

(viii) It is imperative that the relevant authorities are continuously involved throughout the basic assessment process as the development property possibly falls within geographically designated areas in terms of numerous GN R. 985 Activities. Written comments must be obtained from the relevant authorities and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.

(c) Layout & Sensitivity Maps

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

(d) Alternatives

- (i) Please note that you are required to provide a full description of the process followed to reach the proposed preferred alternative within the site, in terms of Appendix 1(3)(1)(h) of the EIA Regulations 2014, as amended, including the following content:
 - a) details of all the alternatives considered;
 - b) details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;
 - c) a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them;
 - d) the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;
 - e) the impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts—

- (aa) can be reversed;
- (bb) may cause irreplaceable loss of resources; and
- (cc) can be avoided, managed or mitigated;
- the methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives;
- g) positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;
- h) the possible mitigation measures that could be applied and level of residual risk;
- i) the outcome of the site selection matrix;
- j) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and
- a concluding statement indicating the preferred alternatives, including preferred location of the activity.
- (ii) Written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 1.

(e) Specialist Declaration of Interest

(i) Specialist Declaration of Interest forms must be attached to the final BAR. You are therefore requested to submit original signed Specialist Declaration of Interest forms for each specialist study conducted. The forms are available on the Department's website (please use the Department's template).

(f) Specialist Assessments

- (i) The EAP must ensure that the terms of reference for all the identified specialist studies must include the following:
 - a) A detailed description of the study's methodology; indication of the locations and descriptions of the development footprint, and all other associated infrastructures that they have assessed and are recommending for authorisation.
 - b) Provide a detailed description of all limitations to the studies. All specialist studies must be conducted in the right season and providing that as a limitation will not be allowed.
 - c) Please note that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the 'no-go' areas.
 - d) Should the specialist definition of 'no-go' area differ from the Department's definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.
 - e) All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.
 - f) Bird and bat specialist studies must have support from Birdlife South Africa and SABAA.
 - g) Should a specialist recommend specific mitigation measures, these must be clearly indicated.
- (ii) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defendable reasons; and were necessary, include further expertise advice.
- (iii) It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting in identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols") and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species),

- have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols.
- (iv) Please also ensure that the final BAR includes the Site Verification Report and Compliance Statements (where applicable) as required by the relevant themes.
- (v) Please note further that the protocols, if applicable, require certain specialists' to be SACNASP registered. Please ensure that the relevant specialist certificates are attached to the relevant reports.
- (vi) As such, the Specialist Declaration of Interest forms must also indicate the scientific organisation registration/member number and status of registration/membership for each specialist.

(g) Cumulative Assessment

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

(h) Undertaking of an Oath

- (i) Please ensure that the final BAR includes an undertaking under oath or affirmation by the EAP.
- (ii) Based on the above, you are therefore required to include an undertaking under oath or affirmation by the EAP (administered by a Commissioner of Oaths) as per Appendix 1(3)(r) of the NEMA EIA Regulations, 2014, as amended, which states that the BAR must include:
 - "an undertaking under oath or affirmation by the EAP in relation to:
 - a) the correctness of the information provided in the reports;
 - b) the inclusion of comments and inputs from stakeholders and I&APs;
 - c) the inclusion of inputs and recommendations from the specialist reports where relevant; and
 - d) any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties".

(i) Details and Expertise of the EAP

(i) You are required to include the details and expertise of the EAP in the BAR, including a curriculum vitae, in order to comply with the requirements of Appendix 1(3)(1)(a) of the NEMA EIA Regulations, 2014, as amended.

(j) Public Participation Process

(i) Please ensure that comments from all relevant stakeholders are submitted to the Department with the final BAR. This includes but is not limited to the Eastern Cape Department of Economic Development, Environmental Affairs and Tourism (DEDEAT), the Dr Beyers Naude Local Municipality, the Eastern Cape Parks and Tourism Agency, the Eastern Cape Provincial Heritage Resources Authority, the Department of Water and Sanitation (DWS), the South African Heritage Resources Agency (SAHRA), BirdLife SA, the South African Bat Assessment Association (SABAA), the Department of Mineral

- Resources and Energy, and the Department of Forestry, Fisheries and the Environment: Directorate Biodiversity and Conservation.
- (ii) The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 and 44 of the EIA Regulations, 2014, as amended.
- (iii) Please ensure that all issues raised and comments received during the circulation of the draft BAR from registered Interested and Affected Parties (I&APs) and organs of state (including this Department's Biodiversity Section), as listed in your I&APs Database, and others that have jurisdiction in respect of the proposed activity are adequately addressed and included in the final BAR.
- (iv) Copies of original comments received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity are submitted to the Department with the final BAR and must be incorporated into a Comments and Response Report (CRR).
- (v) Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. In terms of Regulation 41(2)(b) of the EIA Regulations, 2014, as amended, please provide proof of written notice for the availability of the BAR for comment.
- (vi) The CRR report must be a separate document from the main report and the format must be in the table format as indicated in Annexure 1 of this comments letter.
- (vii) Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as "noted" is not regarded as an adequate response to I&AP's comments.
- (viii) Minutes and attendance registers (where applicable) of any physical/virtual meetings held by the Environmental Assessment Practitioner (EAP) with Interested and Affected Parties (I&APs) and other role players must be included in the final BAR.

(k) Environmental Impact Statement

- (i) You are reminded that an <u>environmental impact statement must be included in the final BAR</u>, therefore you are kindly requested to include an environmental impact statement which contains
 - a) a summary of the key findings of the environmental impact assessment;
 - b) a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers; and
 - a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives.

(I) Environmental Management Programme

- (i) It is drawn to your attention that for <u>substation and overhead electricity transmission and distribution infrastructure</u>, when such facilities trigger activity 11 or 47 of the Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, the generic Environmental Management Programme, contemplated in Regulations 19(4) must be used and submitted with the final report over and above the EMPr for the facility.
- (ii) There needs to be an EMPr for the facility, the onsite substation as well as the power line, for whichever alternative is chosen.
- (iii) Further to the above, you are required to comply with the content of the EMPr in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended.
- (iv) Please be informed that the following content must be incorporated within the EMPr/s as indicated in Appendix 4 of the EIA Regulations 2014, as amended:
 - Details of the EAP who prepared the EMPr; and the expertise of that EAP to prepare an EMPr, including a curriculum vitae.

- A <u>map</u> at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers.
- c) A description of the <u>impact management outcomes</u>, including management statements, identifying the impacts and risks that need to be avoided, managed and mitigated as identified through the environmental impact assessment process for all phases of the development including —
 - (aa) Planning and design;
 - (bb) Pre-construction activities;
 - (cc) Construction activities;
 - (dd) Rehabilitation of the environment after construction and where applicable post closure; and
 - (ee) Where relevant, operation activities.
- d) A description of proposed impact management actions, identifying the manner in which the impact management outcomes contemplated in paragraph (d) of Appendix 4 of the EIA Regulations 2014, as amended, will be achieved, and must, where applicable, include actions to —
- e) Avoid, modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation;
- f) Comply with any prescribed environmental management standards or practices;
- g) Comply with any applicable provisions of the Act regarding closure, where applicable; and
- h) Comply with any provisions of the Act regarding financial provision for rehabilitation, where applicable.
- i) The method of monitoring the implementation of the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.
- j) The frequency of monitoring the implementation of the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.
- k) An indication of the persons who will be responsible for the implementation of the impact management actions.
- I) The time periods within which the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended, must be implemented.
- m) The mechanism for monitoring compliance with the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.
- n) A program for reporting on compliance, taking into account the requirements as prescribed by the Regulations.

(m) General

- The final BAR must include a list providing a clear description of the infrastructure associated with the development.
- (ii) The final BAR must provide the technical details for the proposed facilities in a table format as well as their description and/or dimensions. A sample for the minimum information required is listed under Annexure 2 below.
- (iii) The EAP must provide details of the specific locations in the BAR. All associated infrastructure must be clearly indicated in the final BAR and its associated layout plans.
- (iv) When submitting the BAR and future documents kindly name each of the documents and attachments according to the information it contains e.g., instead of only naming it Appendix A, it must be Appendix A: Maps, Appendix B: EAP Declaration etc.
- (v) The EAP must provide an outline of where in the final BAR each of this Department's comments are addressed. This must be a separate document and must submitted as an appendix to the final BAR.
- (vi) Please also ensure that the final <u>BAR includes the period</u> for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended.

You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: "Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (a) a basic assessment report, inclusive of any specialist reports, an EMPr, a closure plan in the case of a closure activity and where the application is a mining application, the plans, report and calculations contemplated in the Financial Provisioning Regulations, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority".

Should there be significant changes or new information that has been added to the BAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 19(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: "the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (b) a notification in writing that the documents contemplated in subregulation 1(a) will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the documents which changes or information was not contained in the original documents consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised documents will be subjected to another public participation process of at least 30 days."

Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.

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

Yours faithfully

Mr Sabelo Malaza

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

Signed by: Mr Coenrad Agenbach

Designation: Deputy Director: Priority Infrastructure Projects

Date: 11 April 2023

CC:	Unai Urtasun	Aberdeen Wind Facility 2 (Pty) Ltd	E-mail: unai.bravo.urtasun@acciona.com	
	Dayalan Govender	Eastern Cape DEDEAT	E-mail: dayalan.govender@dedea.gov.za	
	Dr Edward Martin Rankwana	Dr Beyers Naude Local Municipality	E-mail: mmoffice@bnlm.gov.za	

Annexure 1: Format for Comments and Response Report:

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

Annexure 2: Sample of technical details for the proposed facility

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



Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 625 1042

Reference: Aberdeen Wind Facility Cluster Enquiries: Ms M Rabothata

Telephone: (012) 399 9174 E-mail: MRabothata@environment.gov.za

Ms. Nicolene Venter Savannah Environmental PO Box 148 SUNNINGHILL 2157

Telephone Number: (+ 27) 11 656 3237

Email Address: publicprocess@savannahsa.com

PER E-MAIL

Dear Ms. Venter

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ABERDEEN WIND FACILITY CLUSTER, EASTERN CAPE PROVINCE.

The Directorate: Biodiversity Conservation reviewed and evaluated the aforementioned report.

Based on the information provided in the report, the Gannaleegte non-perennial river passes through the centre of the project site and several non-perennial drainage lines traverse across the project site. It has been noted that the facility layout has avoided all the environmental sensitive ecological areas identified within the development area and the recommended buffers are established. In addition, the proposed development will not result in unacceptable environmental impacts. Cumulative significance of impact of the project will be high to bats.

Notwithstanding the above, the following recommendations must be considered in the final report:

- No turbine development is permitted within the identified no-go areas.
- Sensitive habitats in close proximity to the development footprint must be avoided or demarcated as No-Go area (i.e. Gannaleegte River, plains, rocky areas and ridges).
- Pre--construction walk-through to locate Species of Conservation Concern that can avoided must be undertaken with a qualified specialist.
- Alien Invasive Plant Species Management Plan and Rehabilitation Plan must be developed and submitted as part of the final report to mitigate on habitat degradation due to erosion and alien plant invasion.
- Appropriate buffer must be established around medium sensitive habitats (i.e. Bats habitats, River).



COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ABERDEEN WIND FACILITY CLUSTER, EASTERN CAPE PROVINCE.

 The final Layout Map overlaid with sensitivities and indicating the final footprint for the proposed development avoiding environmentally sensitive areas must be included in the Final report.

All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@environment.gov.za for attention of **Mr Seoka Lekota**.

Yours faithfully

Mr. Seoka Lekota

Control Biodiversity Officer Grade B: Biodiversity Conservation

Department of Forestry, Fisheries & the Environment

Date: 13/04/2023

From: Savannah Public Process
Sent: Friday, 14 April 2023 11:03

To: Central Karoo Black Business Development Forum

Subject: RE: Aberdeen Windfarms Project

Attachments: SE3060-Aberdeen WEF AFR BID-FINAAL.pdf; SE3060-Aberdeen WEF BID-FINAL.pdf

Dear Mr Van Wyk,

Thank you for your e-mail below requesting to be part of the public participation process for the Aberdeen Wind Facility 1, Aberdeen Wind Facility 3 located west of the town of Aberdeen.

Savannah Environmental has been appointed as the independent environmental consultant responsible for managing the separate applications for Environmental Authorisation (EA) and undertaking the supporting BA process required to identify and assess potential environmental impacts associated with each project, as well as propose appropriate mitigation and management measures to be contained within the Environmental Management Programmes (EMPrs).

The BA and public participation process was initiated in February 2023 (please refer to the attached Background Information Document which provides details regarding these three (3) projects).

The Basic Assessment Report for each project was made available for review and comment from 10 March 2023 and the review and comment period ended yesterday, 13 April 2023. The reports are still available for download from Savannah Environmental website: https://savannahsa.com/public-documents/energy-generation/aberdeen-wind-energy-facilities/, and your organisation are welcome to submit your written comments **today** to Nicolene Venter at Savannah Environmental by any of the following means:

- WhatsApp: 060 978 8396 (also include please call me); and/or
- Email: publicprocess@savannahsa.com

Please also receive herewith confirmation that you, as representative of the Central Karoo Black Business Development forum, has been registered on the project databases.

Kind regards,



t: +27 (0)11 656 3237 f: +27 (0) 86 684 0547

Nicolene Venter

Public Participation and Social Consultant

e: publicprocess@savannahsa.com

c: +27 (0)60 978 8396

SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015

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From: Central Karoo Black Business Development Forum <centralkaroobbdf@gmail.com>

Sent: Wednesday, April 12, 2023 12:40 PM

To: Savannah Public Process <publicprocess@savannahsa.com>

Subject: Aberdeen Windfarms Project

Good day Sir/Ma'am

I trust you are well.

We as the above-mentioned organization would like to find the relevant contact persons involve in the project, in terms of public participation. We would like to meet those involve in assisting the smooth public participation arrangement.

Can you perhaps assist us with the contact details of the relevant role players please?

Trust you can assist us.

Regards
Basie J. Van Wyk
Communications Officer
Central Karoo Black Business Development Forum
060 413 1251

From: Savannah Public Process

Sent: Wednesday, 26 April 2023 15:45

To: etienne@karooplan.co.za

Subject: RE: ABERDEEN WIND FACILITY 1, ABERDEEN WIND FACILITY 2, ABERDEEN WIND

FACILITY 3 AND ASSOCIATED INFRASTRUCTURE

Dear Mr Terblanche,

As per our acknowledgement e-mail below dated 14 April 2023, herewith the responses to your queries raised in your e-mail dated 12 April 2023:

- Stock theft
- Equipment theft (solar panels, fencing etc.)
- Security issues resulting from influx of outsourced labor/no locals
- Personal Security and safety

It is noted that the project will lead to an increased risk of theft and security in the area. The Socio-Economic Assessment (Refer to Appendix K) has assessed the impact and mitigation measures must be implemented to ensure any negative impact is reduced. Mitigation measures being implemented (amongst others) include:

- The proponent should enter into an agreement with the local farmers in the area whereby damages to farm property etc. during the construction phase will be compensated for. The agreement should be signed before the construction phase commences.
- Contractors appointed by the proponent should provide daily transport for low and semi-skilled workers to and from the site.
- It is recommended that no construction workers, with the exception of security personnel, should be permitted to stay over-night on the site.
- Contractors appointed by the proponent must ensure that construction workers who are found guilty of stealing livestock and/or damaging farm infrastructure are dismissed and charged. This should be contained in the Code of Conduct. All dismissals must be in accordance with South African labour legislation.
- Where reasonable and practical, the proponent should appoint local contractors and implement a 'locals first'
 policy, especially for semi and low-skilled job categories. However, due to the low skills levels in the area, the
 majority of skilled posts are likely to be filled by people from outside the area.

With the implementation of mitigation, theft and security impacts were assessed as being of a low significance.

Unsightly views/scenery and degradation of the pristine Karoo landscape

A visual impact assessment was undertaken for the project (Refer to Appendix I). The assessment concluded that the visual impact of the project is expected to be of overall high significance to sensitive visual receptors. Whilst there are no feasible mitigations against this impact, mitigations will be implemented for lighting and construction phase visual impacts. However, due to the remoteness and location of the facility within a REDZ, the impacts were considered acceptable by the specialist.

- Damage to roads due to additional traffic and heavy vehicles
- Road management and repairs when the project is done

The Traffic Impact Assessment Report (Refer to Appendix M) assessed and addressed the traffic impacts. It should be noted that the construction impacts will be temporary and of low significance with the implementation of the mitigation measures. Mitigation measures are included in the EMPr for both anticipated traffic and road maintenance impacts, which include:

- Regular maintenance of gravel roads by the Contractor during the construction phase
- Stagger component delivery to site

- Reduce the construction period
- The use of mobile batching plants and quarries in close proximity to the site
- Staff and general trips should occur outside of peak traffic periods.

No impacts of high significance were identified, and no fatal flaws are associated with the Aberdeen Wind Facility 1, 2 and 3 from a traffic perspective.

Pressure on the scarce water resource, previous projects were using more than 1m liters per week only to reduce dust levels

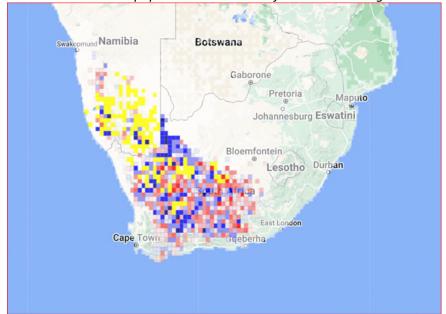
A separate water consumption study will be conducted in order to determine the water requirements of the facility but it is anticipated that 90 000 m3 per annum will be required during the construction phase and 400 m3 per annum will be required during the 20 year operation.

The water supply for the project is still to be determined. Water Use License Applications will be applied for, where required, to ensure that water is abstracted sustainably.

I would also like to find out if any studies have been done on the Vaalkorhaan bird or as known here as the "Vlakte korhaan) which is limited to a small area in the Karoo. What will be the impact on this specie.

The following reply has been provided by the avifaunal specialist, Dr Rob Simmons:

The last paper to be written on the Vaalkoorhaan was in 1994. The Roberts' text (2005) gives the most up to date text on the ecology of the bird and the SABAP2 data sets show that the species shows increasing (blue) reporting rates (likelihood that it will occur in a pentad) in the northern and central parts of its range. Orange/pink areas however show declines in reporting rates in many other parts of its range. The yellow squares are areas that have insufficient data. There are no obvious population trends therefore across its large Nama Karoo range.



The Collision-Risk Assessment presented in the avifaunal study took this species into account as a "Priority" species (one in the top 100 that may be affected by the renewable energy industry). In general this Near Threatened species is not expected to be negatively influenced by any wind farm development. This arises because it rarely flies high enough to be impacted directly by spinning blades (our records show that it spent only 9% of its flight time in the blade swept areas). In a national review of all (848) fatalities at 20 wind farms, only 8 individual korhaans (all three species) were recorded as fatalities (Perold et al. 2020). The impact is therefore expected to be very low.

The above queries and responses provided are being included in the Comments & Response Report that will be submitted with the final Basic Assessment Report to the Department for decision-making.

Kind regards,



t: +27 (0)11 656 3237 f: +27 (0) 86 684 0547

Nicolene Venter

Public Participation and Social Consultant

e: publicprocess@savannahsa.com

c: +27 (0)60 978 8396

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From: etienne@karooplan.co.za <etienne@karooplan.co.za>

Sent: Wednesday, April 12, 2023 11:19 AM

To: Savannah Public Process <publicprocess@savannahsa.com>

Subject: ABERDEEN WIND FACILITY 1, ABERDEEN WIND FACILITY 2, ABERDEEN WIND FACILITY 3 AND ASSOCIATED

INFRASTRUCTURE Importance: High

Good Day

I have a couple of questions/comments regarding the abovementioned wind farm

My concern about the following, which will impact me but for which i will receive no compensation: (based on previous experiences)

- Stock theft
- Equipment theft (solar panels, fencing etc.)
- Damage to roads due to additional traffic and heavy vehicles
- Unsightly views/scenery and degradation of the pristine Karoo landscape
- Pressure on the scarce water resource, previous projects were using more than 1m liters per week only to reduce dust levels
- Security issues resulting from influx of outsourced labor/no locals
- Personal Security and safety
- Road management and repairs when the project is done

I would also like to find out if any studies have been done on the Vaalkorhaan bird or as known here as the "Vlakte korhaan) which is limited to a small area in the Karoo. What will be the impact on this specie.

We look forward hearing from you with regards to the abovementioned

Kind Regards

Etienne Terblanche Karoo Plan Tel: 049 891 0224 **C**ell: 072 286 6884

Email: Etienne@karooplan.co.za



From: Francois Strydom < Francois.Strydom@dod.mil.za>

Sent: Tuesday, 07 February 2023 10:28

To: Savannah Public Process

Cc:Nicolene Venter; dwfopsmiem@gmail.com; Etienne van Blerk; Directorate FacilitiesSubject:Re: SE3060: ABERDEEN WIND FACILITY 1, ABERDEEN WIND FACILITY 2, ABERDEEN

WIND FACILITY 3 AND ASSOCIATED INFRASTRUCTURE - Notification of the Basic

Assessment and Public Participation Processes

Attachments: 0.gif; 1.png

Importance: High

Good Day

1. Herewith to respond to your request sent to the Department of Defence (DOD) for clearance.

- 2. Please note that this office can not respond to your request as there is a Formal and Standard process for Applications in the DOD
- 3. The correct Application Process:
- a. Send your request to the following e-mail addresses only.
- i. clogfac@gmail.com
- ii. dfacmiem@gmail.com
- b. Formulate a comprehensive request, with the Project Plan and formal letter with details of the Project. (Not an e-mail Message with the criteria) It must be on a formal company letterhead, please.
- c. Include KMZ / KML file for use in Google Earth.
- 4. Once received by the environments in Par 3, the DOD will request all DOD Stakeholders to respond in writing (Telecoms, Aviation, Environmental, Facilities etc).
- 5. Once the stakeholders has responded, a single response will be sent to the Applicant with Objection / No -objection.
- 6. Stakeholders may not correspond directly to the Applicant

Regards,

Lieutenant Colonel Francois P Strydom
Department of Defence
Command and Management Information Systems Division
Directorate CMIS Static Systems
Radio Spectrum & Communication Site Management
Eco Glades 1
Centurion
Rooihuiskraal

Pretoria South Africa

E-Mail: Francois.Strydom@dod.mil.za

Tel Office: (+27) 12 649 1503 Work Fax: (+27) 12 649 1560 Cellular: (+27) 82 655 3259

From: Savannah Environmental Public Process <publicprocess@savannahsa.com>

Sent: Monday, 06 February 2023 19:07

To: Francois Strydom Cc: Nicolene Venter

Subject: SE3060: ABERDEEN WIND FACILITY 1, ABERDEEN WIND FACILITY 2, ABERDEEN WIND FACILITY 3 AND ASSOCIATED INFRASTRUCTURE - Notification of the Basic Assessment and Public Participation Processes

BASIC ASSESSMENTS FOR ABERDEEN WIND FACILITY 1, ABERDEEN WIND FACILITY 2, ABERDEEN WIND FACILITY 3 AND ASSOCIATED INFRASTRUCTURE NEAR ABERDEEN, EASTERN CAPE PROVINCE

(DFFE Reference Nos.: To be Issued)

Dear Stakeholder and Interested & Affected Party,

The development of three (3) separate wind energy facilities and associated infrastructure are proposed to be developed on various project sites located approximately 20 km west of the town of Aberdeen in the Eastern Cape Province. The three wind energy facilities are to be known as Aberdeen Wind Facility 1, Aberdeen Wind Facility 2 and Aberdeen Wind Facility 3. The project sites are located within the Dr Beyers Naude Local Municipality and the greater Sarah Baartman District Municipality.

The project will aid in the diversification and stabilisation of the country's electricity supply with the three proposed wind farm facilities set to inject up to 720MW into the national grid. Each wind energy facility will connect to the grid via a grid connection solution consisting of an Eskom switching substation and a power line, and which will be subject to a separate application of Environmental Authorisation.

Please find attached the following documents for your perusal:

- Invitation letter to participate in the Basic Assessment and Public Participation Process for these three (3) Wind Facilities.
- Background Informatin Document which will provide you with additional technical information regarding the proposed developments (ook beskikbaar in Afrikaans).
- Registration and Comment Form (ook beskikbaar in Afrikaans).

Please do not hesitate to contact us should you require any additional information at this stage.

Kind regards,

Unsubscribe this type of

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[cid:123020619073200275@za-mta-89.za.mimecast.lan]

[cid:123020619073200175@za-mta-89.za.mimecast.lan]

Nicolene Venter Public Process t: 011 656 3237

f: 086 684 0547 e: publicprocess@savannahsa.com

c: +27 (0) 60 978 8396

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From: Savannah Public Process

Sent: Wednesday, 22 February 2023 04:58

To: Johan Theron, Vodacom; Anela Filtane, Vodacom; Joseph Tobi, Vodacom

Subject: Aberdeen Wind Facility 1, Aberdeen Wind Facility 2, Aberdeen Wind Facility 3 &

Associated Infrastructure - Response to request for kmz

Dear Johan,

Please be informed that the kmz is not yet available but will be shared with Vodacom once available.

Kind regards,



t: +27 (0)11 656 3237 f: +27 (0) 86 684 0547

Nicolene Venter

Public Participation and Social Consultant

e: publicprocess@savannahsa.com

c: +27 (0)60 978 8396

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From: Johan Theron, Vodacom < Johan. Theron@vodacom.co.za>

Sent: Friday, 10 February 2023 08:51

To: Anela Filtane, Vodacom <Anela.Filtane@vodacom.co.za>; Joseph Tobi, Vodacom <Joseph.Tobi@vodacom.co.za>;

Savannah Public Process <publicprocess@savannahsa.com>

Subject: RE: SE3060: ABERDEEN WIND FACILITY 1, ABERDEEN WIND FACILITY 2, ABERDEEN WIND FACILITY 3 AND

ASSOCIATED INFRASTRUCTURE - Notification of the Basic Assessment and Public Participation Processes

?

C2 General

From: Johan Theron, Vodacom

Sent: Thursday, 09 February 2023 11:57

To: Anela Filtane, Vodacom < Anela.Filtane@vodacom.co.za; Joseph Tobi, Vodacom < Joseph.Tobi@vodacom.co.za;

'publicprocess@savannahsa.com' < <u>publicprocess@savannahsa.com</u> >

Subject: RE: SE3060: ABERDEEN WIND FACILITY 1, ABERDEEN WIND FACILITY 2, ABERDEEN WIND FACILITY 3 AND

ASSOCIATED INFRASTRUCTURE - Notification of the Basic Assessment and Public Participation Processes

Dear Nicolene Venter

Can you please mail me a KML for the proposed wind tower locations

Appreciated

Johan Theron Eastern Vodacm tx manager 0829901184

C2 General

From: Anela Filtane, Vodacom < Anela. Filtane@vodacom.co.za>

Sent: Thursday, 09 February 2023 09:26

To: Johan Theron, Vodacom < <u>Johan.Theron@vodacom.co.za</u>>; Joseph Tobi, Vodacom < <u>Joseph.Tobi@vodacom.co.za</u>> Subject: FW: SE3060: ABERDEEN WIND FACILITY 1, ABERDEEN WIND FACILITY 2, ABERDEEN WIND FACILITY 3 AND ASSOCIATED INFRASTRUCTURE - Notification of the Basic Assessment and Public Participation Processes

Hi Gents,

Please see below email trails and attached documents.

Thereafter please respond to Nicole.

Regards



Anela Filtane
Regional Manager: Estates
Estate Management (Eastern Region & KZN)
Vodacom Tower Company (Pty) Ltd

anela.filtane@vodacom.co.za Vodacomacres, Port Elizabeth 041 396 3111 066 304 3662

vodacom.co.za

Further together



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From: Savannah Public Process

Sent: Wednesday, 15 February 2023 08:19

To: Stefan Geldenhuys (S)

Subject: RE: [C] SE3060 Wind farms 20km west of Aberdeen on farm Koppies Kraal, Doorn

Poort, Kraanvogel, Wildebeeste, Kraai Rivier, Aberdeen area

Dear Stefan,

Please receive herewith our acknowledgement of Openserve's correspondence for the Aberdeen Wind Facility 1, Aberdeen Wind Facility 2 and Aberdeen Wind Facility 3.

Kind regards,



t: +27 (0)11 656 3237 f: +27 (0) 86 684 0547

Nicolene Venter

Public Participation and Social Consultant

e: publicprocess@savannahsa.com

c: +27 (0)60 978 8396

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From: Stefan Geldenhuys (S) <GeldenS@telkom.co.za>

Sent: Tuesday, 14 February 2023 09:24

To: Savannah Public Process <publicprocess@savannahsa.com>

Subject: [C] SE3060 Wind farms 20km west of Aberdeen on farm Koppies Kraal, Doorn Poort, Kraanvogel, Wildebeeste,

Kraai Rivier, Aberdeen area

Good day

Please find attached your approved Openserve wayleave.

Please note: Our area representative as listed on the wayleave **should be contacted at least 48 hours prior to commencement of construction** in order to show services out on site, as our services on the attached plan(s) are **APPROXIMATE ONLY**.

Please note, wayleave applications will NOT be accepted by this mailbox. Please send all wayleave requests to wayleaveswr@telkom.co.za

Please ensure that the Openserve service plan(s) are printed in colour (if applicable) and on the correct page size as indicated in the bottom right corner, in order to ensure that services can be seen clearly.

Thanks.

Stefan Geldenhuys



Building Cabling & Design & Wayleaves 021 414 5546 081 353 9456 stefang@openserve.co.za

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10 Jan Smuts Drive Pinelands 7404 **Stefan Geldenhuys** Tel: 021 414 5546

Email: StefanG@openserve.co.za

Our Ref: SWIP_EABD0116_23

Your Ref : SE3060

13 February 2023

Attention: Nicolene Venter
Aberdeen Wind Facility 1,2, and 3
First Floor
Block 2
5 Woodlands Drive
Office Park
Cnr Woodlands Drive& Western Service
Woodmead

NO SERVICES AFFECTED

<u>Wayleave application</u>: Wind farms, 20km west of Aberdeen on farm Koppies Kraal, Doorn Poort, Kraanvogel, Wildebeeste, Kraai Rivier, Aberdeen area

With reference to your letter received **06 February 2023**

Please notify this office immediately if you locate any Openserve plant that was not indicated.

Please contact our representative

Thomas Phillips / 045 838 2968/ 081 366 2823 / Thomasp@openserve.co.za 48 hours prior to commencement of construction work.

I hereby inform you that Openserve approves the proposed work indicated on your drawing in principle. This approval is valid for <u>06 MONTHS ONLY</u>, after which reapplication must be made if the work has not been completed.

Any changes or deviations from the original planning during or prior to construction must immediately be communicated to this office.

As per supplied sketches it would appear as if Openserve infrastructure would not be affected.

However, care should still be taken should it become evident that there is in fact Openserve network present at the actual sites. Such lines should be treated in accordance with, and clearances stipulated in the Occupational Health and Safety Act no 85 of 1993, Electrical Machinery Regulations 20 - Crossings, and Electrical Machinery Regulations 15 – Clearances of Power Lines. If the specifications could not be met, all deviation costs will be for the applicant's account. We also refer to Section 25 of the Electronic Communication Act 36 of 2005.

Please notify this office immediately if you locate any Openserve plant not indicated.

It would be appreciated if this office can be notified within 30 days of completion of the construction work. Confirmation is required on completion of construction as per agreed requirements.

Should Openserve infrastructure be damaged while work is undertaken, kindly contact our representative immediately.

All Openserve rights remain reserved.

Yours faithfully



For Selwyn Bowers
Operations Manager

Wayleave Management: Western Region

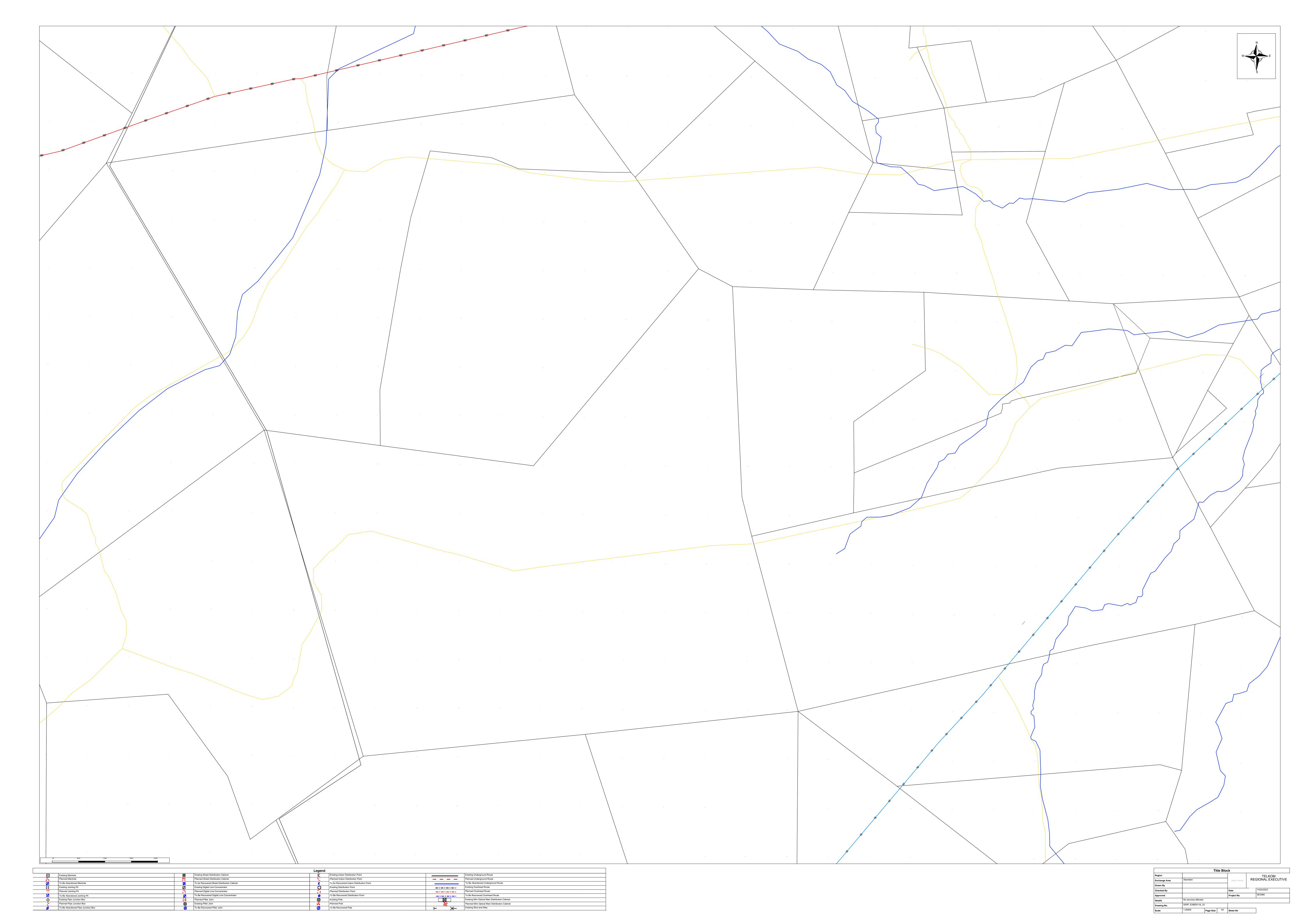
PLANT NOT AFFECTED

If any plant not indicated exists and information or supervision is required please contact this office at least <u>48 hours</u> before any work commences.

Thomas Phillips / 045 838 2968/ 081 366 2823 / Thomasp@openserve.co.za

Refence number	Marked Up	<u>Date</u>
SWIP_EABD0116_23	S Geldenhuys	14-Feb-23





From: Savannah Public Process

Sent: Tuesday, 28 February 2023 06:34

To: 'Dirk Pretorius'

Subject:RE: Aberdeen WEF EIAAttachments:PRETORIUS Dirk.pdf

Hi Dirk,

Please receive herewith confirmation of EnviroAgri's registration as an I&AP on the Aberdeen WEFs database.

The BA Reports would be release in due course and you will be notified of the availability thereof.

Would it be possible to share a kmz with us of the study area / site for the WEF cluster?

Kind regards,



t: +27 (0)11 656 3237 f: +27 (0) 86 684 0547

Nicolene Venter

Public Participation and Social Consultant

e: publicprocess@savannahsa.com

c: +27 (0)60 978 8396

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From: Dirk Pretorius < dirk@enviroagri.com>

Sent: Friday, 24 February 2023 15:26

To: Savannah Public Process <publicprocess@savannahsa.com>

Subject: Aberdeen WEF EIA

Good afternoon Nicolene,

Can you please register EnviroAgri as I&AP on the Aberdeen WEF EIA.

We are currently busy with preliminary impact assessments for a WEF cluster in close proximity to the proposed Aberdeen WEFs.

Kind regards,

Dirk Pretorius

Pr.Sci.Nat., Reg.EAP BSc Cons.Ecol., MSc Zoology Cell 072 100 27 12

Email dirk@enviroagri.com

Skype envirodirk

Website www.enviroagri.com

