

KENNISGEWING VAN 'N OMGEWINGSIMPAKEVALUERINGSPROSES (OIE) VIR DIE BEOOGDE HEUWELTJIES WINDKRAGAANLEG (WEF) EN 'N APARTE BASIESE EVALUERINGSPROSES (BE) VIR DIE BEOOGDE KRAGNETINFRASTRUKTUUR NABY BEAUFORT-WES, WES-KAAPPROVINSIE

Ingevolge die Nasionale Wet op Omgewingsbestuur, 1998 (Wet 107 van 1998) (NEMA), soos gewysig, en die Regulasies op Omgewingsimpakevaluerings (OIE-regulasies) kragtens Staatskennisgewing R982, R983, R984 en R985 wat op 4 Desember 2014 afgekondig en op 7 April 2017 gewysig is, geskied kennis hiermee dat South Africa Mainstream Renewable Power Developments (Edms.) Bpk. (hierna "Mainstream" genoem) SiVEST SA (Edms.) Bpk. aangestel het as die onafhanklike Omgewingsevalueringspraktisyn (OEP) om die nodige OIE, Basiese Evaluering (BE) en Openbare Deelnameprosesse (ODP's) vir die ontwikkeling te onderneem. Die bevoegde owerheid vir die vereiste Omgewingsprosesse is die Nasionale Departement van Bosbou, Visserye en Omgewingsake (DBVO).

PROJEKBESKRYWING

Ter stawing van die nodigheid om weg te beweeg van steenkool as 'n hoofbron van elektrisiteit en om meer volhoubare en omgewingsvriendelike energiehulpbronne te kry, het Suid-Afrika 'n program vir die ontwikkeling van infrastruktuur van stapel gestuur wat deur verskeie staatsinisiatiewe ondersteun word. In reaksie op hierdie doelwit, beoog Mainstream die oprigting en bedryf van die Heuweltjies WEF met verwante infrastruktuur naby Beaufort-Wes in die Wes-Kaapprovinsie. Gevolglik word 'n OIE- vir die WEF en 'n BE-proses vir die verwante Roosterkonneksie benodig. Hoewel die komponente onderhewig sal wees aan aparte BE-prosesse, sal die ODP vir die twee gekombineer word.

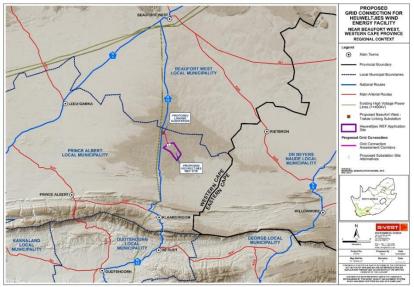
Op hierdie stadium word verwag dat die beoogde Heuweltjies Windkragaanleg (WEF) sal bestaan uit hoogstens 60 windturbines, met 'n maksimum uitvoervermoë van sowat 240 MW, asook 'n 33/132 kV interne substasie en Batterykragbergingsaanleg (BESS). Die elektrisiteit wat deur die beoogde WEF-ontwikkeling opgewek word, sal via 'n 132 kV oorhoofse kraglyn by die nasionale kragnet ingevoer word. Die finale ontwerpbesonderhede, tesame met die struktuuroriëntasie van die turbines, sal beskikbaar raak tydens die gedetailleerde ontwerpfase van die beoogde ontwikkeling vóór konstruksie 'n aanvang neem, en sal toegelig word deur die uitkoms van die spesialisstudies.

PROJEKLIGGING

Die beoogde WEF en verwante roosterkonneksie-infrastruktuur is sowat 70 km en 65 km (onderskeidelik) suid van Beaufort-Wes in die Wes-Kaapprovinsie geleë en is in die Prins Albert Plaaslike Munisipaliteit in die Sentrale Karoo Distriksmunisipaliteit. Die aansoekterrein is sowat 4 017,6 hektaar (ha) in omvang en behels die volgende plaasgedeeltes:

- Restant van die plaas Witpoortjie No. 16
- Gedeelte 8 van die plaas Klipgat No. 114

'n Kleiner boubare gebied (1 673 ha) is geïdentifiseer as gevolg van 'n voorlopige geskiktheidsevaluering wat deur Mainstream onderneem is en hierdie gebied sal waarskynlik verder op grond van uitkomste van verskeie spesialisstudies, wat as deel van die OIE- en BE-prosesse onderneem word, verfyn word.



Om as 'n Belangstellende en/of Geaffekteerde Party (B&GP) te registreer en/of om bykomende inligting te bekom, moet u asseblief u naam, kontakbesonderhede (telefoonnommer, pos- en e-posadres) en die belang wat u by die aansoek het, aan SiVEST verstrek by die onderstaande besonderhede en die verwysing 'Heuweltjies WEF and Grid' in u korrespondensie gebruik:

Hlengiwe Ntuli

 SiVEST Environmental
 Tel:
 011 798 0600

 Posbus 2921
 Faks:
 011 803 7272

RIVONIA E-pos: sivest_ppp@sivest.com
2128 Webwerf: www.sivest.com/za



NOTICE OF AN ENVIRONMENTAL IMPACT ASSESSMENT (EIA) PROCESS FOR THE PROPOSED HEUWELTJIES WIND ENERGY FACILITY (WEF) AND SEPERATE BASIC ASSESSMENT (BA) PROCESS FOR THE PROPOSED GRID INFRASTRUCTURE, NEAR BEAUFORT WEST, WESTERN CAPE PROVINCE

In terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) as amended and the Environmental Impact Assessment (EIA) Regulations, under Government Notices No R982, R983, R984 and R985 promulgated on 4 December 2014 and amended on 07 April 2017, notice is hereby given that South Africa Mainstream Renewable Power Developments (Pty) Ltd (hereafter referred to as "Mainstream"), has appointed SiVEST SA (Pty) Ltd, as the independent Environmental Assessment Practitioner (EAP), to undertake the required EIA, Basic Assessment (BA) and Public Participation Processes (PPP) for the development. The competent authority for the required Environmental Processes is the National Department of Forestry, Fisheries and the Environment (DFFE).

PROJECT DESCRIPTION

In support of the need to divert from coal as a main source of electricity and to find more sustainable and environmentally friendly energy resources, South Africa has embarked on an infrastructure growth programme supported by various government initiatives. In response to this goal, Mainstream is proposing to construct and operate the Heuweltjies WEF with associated infrastructure, near Beaufort West in the Western Cape Province. Accordingly, an EIA process is required for the WEF and a BA for the associated Grid Connection. While these will be subject to separate Processes, the PPP will be combined for both.

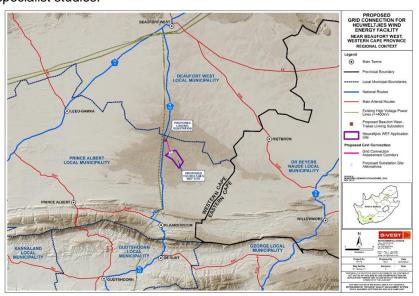
At this stage it is anticipated that the proposed Heuweltjies Wind Energy Facility (WEF) will comprise of up to 60 wind turbines, with a maximum export capacity of approximately 240MW, 33/132kV on-site substation and Battery Energy Storage Facility (BESS). The electricity generated by the proposed WEF development will be fed into the national grid via a 132kV overhead power line. The final design details along with the structure orientation of the turbines will become available during the detailed design phase of the proposed development prior to the start of construction and will be informed by the outcome of the specialist studies.

PROJECT LOCATION

The proposed WEF and associated grid connection infrastructure are located approximately 70km and 65km south (respectively) of Beaufort West in the Western Cape Province, within the Prince Albert Local Municipality, in the Central Karoo District Municipality. The application site is approximately 4017.6 hectares (ha) in extent and incorporates the following portions:

- Remainder of the Farm Witpoortje
- Portion 8 Of The Farm Klipgat No

A smaller buildable area (1673 ha ha) has been identified as a result of a preliminary suitability assessment undertaken by Mainstream and this area is likely to be further refined based on outcomes of various specialist studies being conducted as part of the



To register as an Interested and / or Affected Party (I&AP) and / or to obtain additional information please submit your name, contact details (telephone number, postal address and email address) and the interest which you have in the application to SiVEST as per the details below and please reference the 'Heuweltjies WEF and Grid' in your correspondence:

Hlengiwe Ntuli

Tel: (011) 798 0600

SiVEST Environmental P O Box 2921

Fax: (011) 803 7272 **RIVONIA** E-mail: sivest_ppp@sivest.com 2128 Website: www.sivest.com/za

SIVEST

4 Pencarrow Crescent, La Lucia Ridge Office Estate, Umhlanga Rocks. 4320 PO Box 1899, Umhlanga Rocks. 4320 KwaZulu-Natal. South Africa



Heuweltjies WEF Site Notice Proof





SiVEST SA (Pty) Ltd | Registration No. 2000/006717/07 t/a SiVEST

Part of the SiVEST Group | www.sivest.com

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www.mbmconsult.com















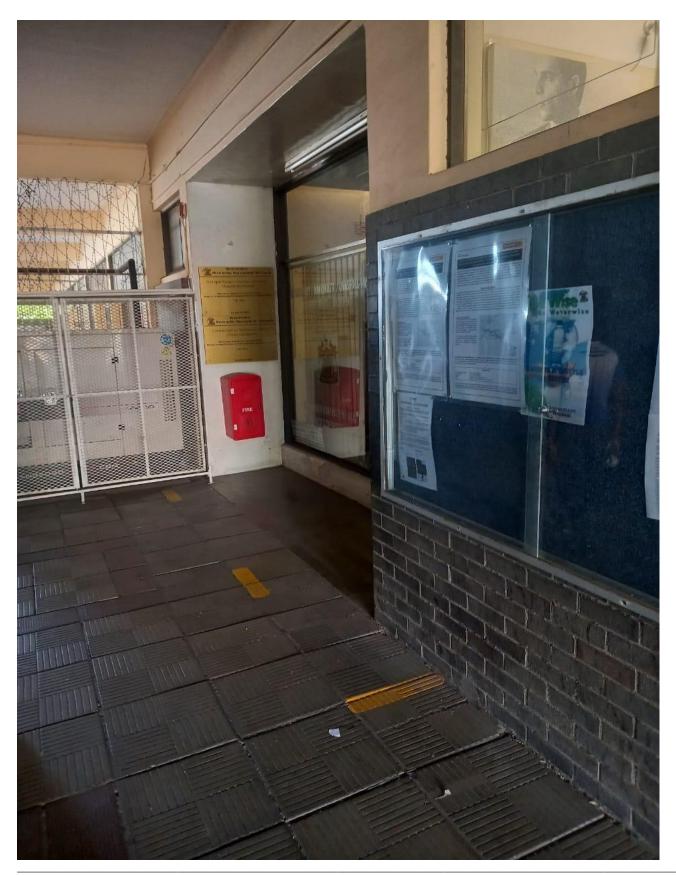






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South Africa Mainstream Renewable Power (Pty) Ltd Proof of site notices

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SIVEST

4 Pencarrow Crescent, La Lucia Ridge Office Estate, Umhlanga Rocks. 4320 PO Box 1899, Umhlanga Rocks. 4320 KwaZulu-Natal. South Africa



Beaufort West Library Tablet Proof



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Curepipe www.dwcsivest.com United Kingdom MBM Consulting

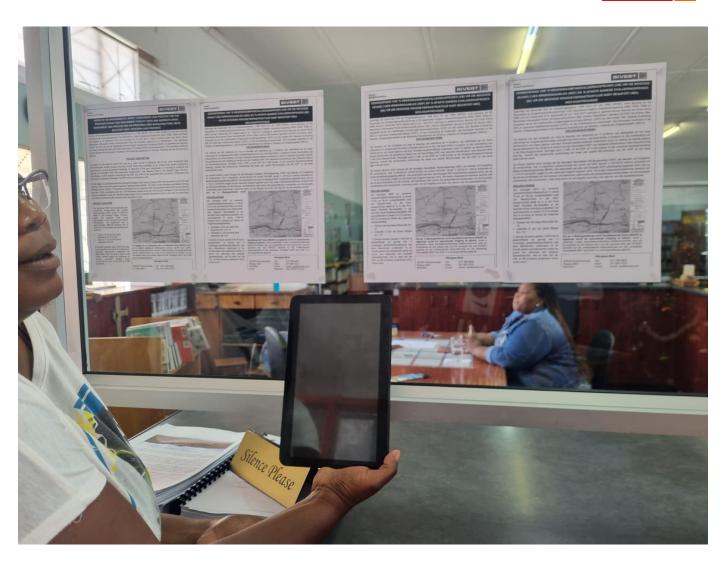
www.mbmconsult.com

London, England +44 0203 817 7691 Tunbridge Wells, England +44 1892 557 290









ENVIRONMENTAL IMPACT ASSESSMENTS (EIAS) FOR THE PROPOSED HEUWELTJIES AND KRAALTJIES WIND ENERGY FACILITIES AND BASIC ASSESSMENTS (BAS) FOR THE PROPOSED 132kV POWER LINE AND ASSOCIATED SUBSTATIONS, NEAR BEAUFORT WEST, WESTERN CAPE PROVINCE

DISTRIBUTION OF THE FINAL SCOPING REPORTS TO ORGANS OF STATE FOR COMMENT

	DISTRIBUTION OF THE FINAL SCOPING REPORTS TO ORGANS OF STATE FOR COMMENT					
TITLE	SURNAME	NAME	POSITION	POSTAL ADDRESS	EMAIL ADDRESS	RESPONSE / RECEIPT OF COMMENTS
BEAUF	ORT WEST LOCAL MI	JNICIPALITY				
Mr	Haarhoff	Kosie	Municipal Manager	Private Bag X582 BEAUFORT WEST 6970	kosieh@beaufortwestmun.co.za admin@beaufortwestmun.co.za	Access to an electronic copy of the report was emailed on 15 December 2022 and CD was posted on 15 December 2022, An email reminder was sent on 17 January 2023, 27 January 2023 and 06 February 2023 respectively. Any
Ms	Ruiters	Vuyokazi	Waste Manager	Private Bag X582 BEAUFORT WEST 6970	wastemanager@beaufortwestmun.co.za	comments received after the Final Scoping Report has been submitted will be addressed during the EIA phase.
	ALBERT LOCAL MUN					
Ms	Vorster	Anneleen	Acting Municipal Manager	Private Bag X53 PRINCE ALBERT 6930	adminklerk@pamun.gov.za annaleen@pamun.gov.za	Access to an electronic copy of the report was emailed on 15 December 2022 and CD was posted on 15 December 2022, An email reminder was sent on 17 January 2023, 27 January 2023 and 06 February 2023 respectively. Any comments received after the Final Scoping Report has been submitted will be addressed during the EIA phase.
CENTR	AL KAROO DISTRICT	MUNICIPALITY				
Mr	Jooste	Stefanus	Municipal Manager	Private Bag X582 BEAUFORT WEST 6970	manager@skdm.co.za	Access to an electronic copy of the report was emailed on 15 December 2022 and CD was posted on 15 December 2022, An email reminder was sent on 17 January 2023, 27 January 2023 and 06 February 2023 respectively. Any
Mr	Van Zyl	Gerrit	Manager: Environmental Health Services	Private Bag X582 BEAUFORT WEST 6970	gerrit@skdm.co.za	comments received after the Final Scoping Report has been submitted will be addressed during the EIA phase.
DEPAR	TMENT OF ENVIRON	MENTAL AFFAIR	RS: BIODIVERSITY SECTION			
Mr	Lekota	Seoka	Control Bidiversity officer Grade B	473 Steve Biko Road Arcadia PRETORIA 0083	slekota@environment.gov.za	Comments received from DFFE Biodiversity and Conservation on 02 February 2023.
Mr	Rabothata	Mmatlala		473 Steve Biko Road Arcadia PRETORIA 0083	mrabothata@environment.gov.za	
WESTE	RN CAPE DEPARTME	NT OF ENVIRON	IMENTAL AFFAIRS & DEVELOPMENT PLANNING	0003	_	
Mr	Gerber	Gerhard	Director: Development Facilitation	Private Bag X9086 Cape Town 8000	Gerhard.Gerber@westerncape.gov.za	Comments received from WC DEA&DP on 06 February 2023.
Mrs	La Meyer	Adri	Directorate: Development Facilitation	Private Bag X9086 Cape Town 8000	Adri.Lameyer@westerncape.gov.za	
DEPAR	TMENT OF WATER A	ND SANITATION	i			
Ms	Claassen	Marianne		Private Bag X16 Sanlamhof 7532	claassenm@dws.gov.za	Access to an electronic copy of the report was emailed on 15 December 2022 and CD was posted on 15 December 2022, An email reminder was sent on 17 January 2023, 27 January 2023 and 06 February 2023 respectively. Any
Ms	Mokhoantle	Lerato	WQM	Private Bag X6101 KIMBERLEY 8300	MokhoantleL@dws.gov.za	comments received after the Final Scoping Report has been submitted will be addressed during the EIA phase.
WESTE	RN CAPE DEPARTME	NT OF CULTURA	AL AFFAIRS & SPORT			
Ms	Peters	Ameerah	PA to CEO	Protea Assurance building Greenmarket Square CAPE TOWN 8001	ceoheritage@westerncape.gov.za	Comments received from HWC on 12 December 2022,
Ms	Heli	Vuyokazi	Heritage Resource Management	Protea Assurance building Greenmarket Square CAPE TOWN 8001	Vuyokazi.Heli@westerncape.gov.za HWC.HWC@westerncape.gov.za	
WESTE	RN CAPE DEPARTME	NT OF AGRICUL	TURE, LAND REFORM & RURAL DEVELOPMENT			
Mr	Herselman	P	Acting Land Use Manager	Private Bag X1 Elsenburg 7607	info@info@elsenburg.com	Access to an electronic copy of the report was emailed on 15 December 2022 and CD was posted on 15 December 2022, An email reminder was sent on 17 January 2023, 27 January 2023 and 06 February 2023 respectively. Any comments received after the Final Scoping Report has been submitted will be addressed during the EIA phase.

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DEAPA	RTMENT OF AGRICU	LTURE, FOREST	RY AND FISHERIES			
	rn Cape Department		T.		T.	
VIs	van Rhyn	Petro	Head of Communication	Private Bag X1 Elsenburg 7607	petrovr@elsenburg.com	Access to an electronic copy of the report was emailed on 15 December 2022 and CD was posted on 15 December 2022, An email reminder was ser on 17 January 2023, 27 January 2023 and 06 February 2023 respectively. Ar comments received after the Final Scoping Report has been submitted will be addressed during the Eld phase.
	al Department					
VIs	Buthalezi	Thoko	Directorate Land-use & Soil Management	Private Bag X120 PRETORIA 0001	Thokob@nda.agric.za	Access to an electronic copy of the report was emailed on 15 December 2022 and CD was posted on 15 December 2022, An email reminder was ser on 17 January 2023, 27 January 2023 and 06 February 2023 respectively. Ar
Ms	Marubini	Mashudu	Assistant Director	Private Bag X120 PRETORIA 0001	mashuduma@daff.gov.za	comments received after the Final Scoping Report has been submitted will be addressed during the EIA phase.
DEPAR	TMENT OF MINERAL	RESOURCES (DI	MR)			
Nation	al Department					
Mr	Msiza	David	The Director General	Private Bag X59 PRETORIA 0001	david.msiza@dmr.gov.za	Access to an electronic copy of the report was emailed on 15 December 2022 and CD was posted on 15 December 2022, An email reminder was ser on 17 January 2023, 27 January 2023 and 06 February 2023 respectively. Ar comments received after the Final Scoping Report has been submitted will be addressed during the EIA phase.
SANRA	L					
Ms	Abrahams	Nicole	Environmental Coordinator	Private Bag X19 BELLVILLE 7535	abrahamsn@nra.co.za	Access to an electronic copy of the report was emailed on 15 December 2022 and CD was posted on 15 December 2022, An email eminder was ser on 17 January 2023, 27 January 2023 and 06 February 2023 respectively. Ar comments received after the Final Scoping Report has been submitted will be addressed durine the EIA ohase.
WESTE	RN CAPE DEPARTME	NT OF TRANSPO	ORT AND PUBLIC WORKS			
Ms Mr	Kiva Manyathi	Wendy	Head of Department	Private Bag X9185 CAPE TOWN 8000	Wendy.Kiva@westerncape.gov.za	Access to an electronic copy of the report was emailed on 15 December 2022 and CD was posted on 15 December 2022, An email reminder was ser on 17 January 2023, 27 January 2023 and 06 February 2023 respectively. An comments received after the Final Scoping Report has been submitted will
	ŕ			Private Bag X9185 CAPE TOWN 8000	Transport.Publicworks@westerncape.gov.za	be addressed during the EIA phase.
	: HEAD OFFICE					
Ms	Higgitt	Natasha	Heritage Officer: Northern Cape	PO Box 4637 CAPE TOWN 8000	nhiggitt@sahra.org.za	Electronic copy of the reported uploaded onto the SAHRIS website howeve project is not within SAHRAs jurisdiction to provide comment.
ESKON	1					
Mr	Geeringh	John	Chief Planner	PO Box 1091 JOHANNESBURG 2000	<u>GeerinJH@eskom.co.za</u>	Access to an electronic copy of the report was emailed on 15 December 2022 and CD was posted on 15 December 2022, An email reminder was ser on 17 January 2023, 27 January 2023 and 06 February 2023 respectively. Ar comments received after the Final Scoping Report has been submitted will be addressed during the EIA phase.
SQUAR	E KILOMETRE ARRA	Y				
Dr	Tiplady	Adriaan	Manager: Site Categorisation	PO Box 522 SAXONWOLD 2132	atiplady@ska.ac.za	Access to an electronic copy of the report was emailed on 15 December 2022 and CD was posted on 15 December 2022, An email reminder was ser on 17 January 2023, 27 January 2023 and 06 February 2023 respectively. Ar comments received after the Final Scoping Report has been submitted will be addressed during the ElA phase.
SA CIVI	IL AVIATION AUTHO					
Ms	Stoh	Lizell	Obstacle Specialist	Private Bag X73 HALFWAY HOUSE 1685	obstacles@caa.co.za strohl@caa.co.za	Access to an electronic copy of the report was emailed on 15 December 2022 and CD was posted on 15 December 2022, An email reminder was ser on 17 January 2023, 27 January 2023 and 06 February 2023 respectively. Ar comments received after the Final Scoping Report has been submitted will be addressed during the Ela Phase.

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AIR TR	R TRAFFIC AND NAVIGATION SERVICES (ATNS)							
Ms	Mileng	Hassinah	Obstacle Evaluator	Private Bag X15 KEMPTON PARK 1620	obstacleevaluator@atns.co.za	Access to an electronic copy of the report was emailed on 15 December 2022 and CD was posted on 15 December 2022, An email reminder was sent on 17 January 2023, 27 January 2023 and 06 February 2023 respectively. Any		
Ms	Morobane	Johanna	Manager: Corporate Sustainability and Environment	Private Bag X15 KEMPTON PARK 1620	JohannaM@atns.co.za	comments received after the Final Scoping Report has been submitted will be addressed during the EIA phase.		
	ET FREIGHT RAIL							
Mr	Seaton	Eddie		PO Box 72501 Parkview 2122	eddie.seaton@transnet.net eddie.seaton@gmail.com	Access to an electronic copy of the report was emailed on 15 December 2022 and CD was posted on 15 December 2022, an email reminder was sent on 17 January 2023, 27 January 2023 and 06 February 2023 respectively. Any comments received after the Final Scoping Report has been submitted will be addressed during the ElA phase.		
SENTEC	Н		-	-		<u> </u>		
Mr	Koegelenberg	Johan	Renewable Projects	Private Bag X06 Honeydew 2040	koegelenbergj@sentech.co.za	Access to an electronic copy of the report was emailed on 15 December 2022 and CD was posted on 15 December 2022, An email reminder was sent on 17 January 2023, 27 January 2023 and 06 February 2023 respectively. Any		
Mrs	Govender	Shanti	Commercial Specialist	Private Bag X06 Honeydew 2040	govenders@sentech.co.za	comments received after the Final Scoping Report has been submitted will be addressed during the EIA phase.		
TELKO		•	<u> </u>	•				
Mr	Shaw	Leonard		Private Bag X20700 BLOEMFONTEIN 9300	leonardS@openserve.co.za	Access to an electronic copy of the report was emailed on 15 December 2022 and CD was posted on 15 December 2022, An email reminder was sent on 17 January 2023, 27 January 2023 and 06 February 2023 respectively. Any		
Ms	Peters	Ihlaam	Wayleave Officer	10 Jan Smuts Drive Pinelands CAPE TOWN 7404	ihlaamp@telkom.co.za IhlaamP@openserve.co.za	comments received after the Final Scoping Report has been submitted will be addressed during the EIA phase.		
ENDAN	GERED WILDLIFE TR	UST	1	"				
Mr	Little	lan	Senior Manager	Kirstenbosch National Botanical Garden Rhodes Drive Newlands CAPE TOWN	iani@ewt.org.za	Commented received from EWT on 20 January 2023.		
Mr	Leeuwner	Lourens	Renewable Energy Project Manager	Private Bag X11, Modderfontein, Johannesburg 1609	lourensl@ewt.org.za			
WESSA			'		+	•		
Mr	Griffiths	Morgan	Conservation Officer	PO Box 12444 Central Hill PORT ELIZABETH 6006	morgan.griffiths@wessa.co.za	Access to an electronic copy of the report was emailed on 15 December 2022 and CD was posted on 15 December 2022, An email reminder was sent on 17 January 2023, 27 January 2023 and 06 February 2023 respectively. Any comments received after the Final Scoping Report has been submitted will be addressed during the EIA phase.		
RIRDIII	E SOUTH AFRICA		-	-		The second secon		
Ms	Lewis	Melissa	Policy Manager	Private Bag X16 PINEGOWRIE 2121	advocacy@birdlife.org.za	Access to an electronic copy of the report was emailed on 15 December 2022 and CD was posted on 15 December 2022, An email reminder was sent		
Ms	Ralston	Samantha		Private Bag X16 PINEGOWRIE 2121	energy@birdlife.org.za	on 17 January 2023, 27 January 2023 and 06 February 2023 respectively. Birdlife informed Sivest that they have a lot of applications they are reviewing and if we do not receive any feedback we should assume there are no comments from the Birdlife.		
SABAA								
Mrs	Richardson	Kate	Chairman		chair@sabaa.org.za	Access to an electronic copy of the report was emailed on 15 December 2022 and CD was posted on 15 December 2022, An email reminder was sent on 17 January 2023, 27 January 2023 and 06 February 2023 respectively. Any comments received after the Final Scoping Report has been submitted will be addressed during the EIA phase.		
CAPE N								
Ms	Simons	Megan	Land Use Advice	Private Bag X6546 GEORGE 6530	msimons@capenature.co.za	Access to an electronic copy of the report was emailed on 15 December 2022 and CD was posted on 15 December 2022, An email reminder was sent on 17 January 2023, 27 January 2023 and 06 February 2023 respectively. Any comments received after the Final Scoping Report has been submitted will be addressed during the EIA phase.		
AGRIA			1					
Mr	Rabie	Janse		Muldersvlei Road ELSENBURG 7607	ianse@agrisa.co.za	Access to an electronic copy of the report was emailed on 15 December 2022 and CD was posted on 15 December 2022. An email reminder was sent on 17 January 2023, 27 January 2023 and 06 February 2023 respectively. Any comments received after the Final Scoping Report has been submitted will be addressed during the EIA phase.		
			MENT AGENCY (BGCMA)					
Ms	Mbunquka	Zama		P.O. Box 1205 George 6530	zmbunquka@bgcma.co.za	Access to an electronic copy of the report was emailed on 15 December 2022 and CD was posted on 15 December 2022, An email reminder was sent on 17 January 2023, 7 January 2023 and 06 February 2023 respectively. Any comments received after the Final Scoping Report has been submitted will be addressed during the EIA phase.		
						addressed during the EIA phase.		

sivest_PPP

From: sivest_PPP

Sent: Thursday, 15 December 2022 15:20
Cc: Rendani Rasivhetshele; Natalie Pullen

Subject: 16170: Heuweltjies and Kraaltjies Wind Energy Facilities near Beaufort West: DSR Comment

Period Starting

Attachments: 16170 Beaufort West WEF DSR Notification Letter Rev 1 14122022.pdf

Tracking: Recipient Delivery

Rendani Rasivhetshele Delivered: 15/12/2022 15:23

Natalie Pullen Delivered: 15/12/2022 15:23

'Kosie Haarhoff'

'Alana Duffell-Canham'

'Melissa Lewis'

'Amanda Visser'

'Andrew September'

'Annaleen Vorster'

'Adriaan Tiplady'

'Barbara Brown' 'Seoka Lekota'

'John Geeringh'

'Grace Swanepoel'

'Johanna Morobane'

'Justin Lesch'

'Johan Koegelenberg'

'Brandon Layman'

'Moses Mahunonyane'

'Stefanus Jooste'

'Margy Jaftha'

'Mashudu Marubini'

'Heinrich Mettler'

'Biodiversity Conservation'

'Edward Njadu'

'G Lottering'

'Petro van Rhyn'

'Roeloef Van Staden'

'Jan Bostander'

'Thoko Buthelezi'

'Truman Prince'

'Vuyokazi Ruiters'

'Morgan Griffiths'

'vanvelden@crawfordsattorneys.co.za'

'admin@pienaarmotors.co.za'

'janse@agrisa.co.za'

'ObstacleEvaluators@atns.co.za'

'JohannaM@atns.co.za'

'piero@amdadevelopments.co.za'

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'admin@beaufortwestmun.co.za'

'wastemanager@beaufortwestmun.co.za'

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Dear Interested and/or Affected Party

NOTICE OF THE SCOPING & ENVIRONMENTAL IMPACT ASSESSMENTS (S&EIAs) FOR THE PROPOSED HEUWELTJIES AND KRAALTJIES WIND ENERGY FACILITIES AND ASSOCIATED INFRASTRUCTURE, NEAR BEAUFORT WEST, WESTERN CAPE PROVINCE

Heuweltjies WEF – (DFFE Ref No: To be announced)

Kraaltjies WEF – (DFFE Ref No: <u>To be announced</u>)

AVAILABILITY OF DRAFT SCOPING REPORTS FOR PUBLIC REVIEW

Please note that SiVEST SA (Pty) Ltd has been appointed by South Africa Mainstream Renewable Power Developments (Pty) Ltd (here after referred to as "Mainstream") as the Environmental Assessment Practitioner (EAP) for the abovementioned projects.

We would like to take this opportunity to inform you that, in accordance with the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) (as amended), the Draft Scoping Reports (DSRs) for the above mentioned projects will be available for public comment and review from **14 December 2022 until 05 February 2023** (end of business day).

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Beaufort West Library	15 Church Street, Beaufort West	Mondays- Fridays 10:00 – 17:00	023 414 8106

The reports as well as the accompanying appendices are also available on SiVEST's website: http://www.sivest.com/za, click on Downloads, then browse to the folder '16170 Beaufort West Wind Energy Facilities'.

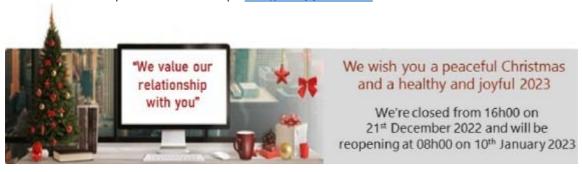
SiVEST is committed to complying with the requirements as set out in terms of POPIA.

I.T.O POPIA, you hereby declare and confirm that you, as an I&AP providing information, consent for your information to be gathered, stored and distributed for the purpose of this project.

Kind Regards, Hlengiwe Ntuli

Project Secretary & PPP Administrators SiVEST Environmental Division

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sivest_PPP

From: sivest_PPP

Sent: Tuesday, 17 January 2023 12:11
Cc: Rendani Rasivhetshele; Natalie Pullen

Subject: FW: 16170: Heuweltjies and Kraaltjies Wind Energy Facilities near Beaufort West: DSR Comment

Period Starting

Attachments: 16170 Beaufort West WEF DSR Notification Letter Rev 1 14122022.pdf

Tracking: Recipient Delivery

Rendani Rasivhetshele Delivered: 17/01/2023 12:15
Natalie Pullen Delivered: 17/01/2023 12:15

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Dear Interested and/or Affected Party (I&AP) / Stakeholder,

NOTICE OF THE SCOPING & ENVIRONMENTAL IMPACT ASSESSMENTS (S&EIAs) FOR THE PROPOSED HEUWELTJIES AND KRAALTJIES WIND ENERGY FACILITIES AND ASSOCIATED INFRASTRUCTURE, NEAR BEAUFORT WEST, WESTERN CAPE PROVINCE

- Heuweltjies WEF (DFFE Ref No: <u>To be announced</u>)
- Kraaltjies WEF (DFFE Ref No: <u>To be announced)</u>

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REMINDER ABOUT COMMENTING PERIOD FOR DRAFT SCOPING & ENVIRONMENTAL IMPACT ASSESSMENTS (S&EIAs)

Please note that the Draft Scoping reports (DSRs) for the above-mentioned projects were made available for public review and comment from **14 December 2022 until 05 February 2023** (end of business day). The review and comment period for the above-mentioned projects, therefore, ends on **Monday 06 February 2023** (end of business day).

SiVEST, therefore, wishes to remind you to submit comments for the above-mentioned projects before the close of business on **Monday 06 February 2023**, if you have not done so already.

Should you have any comments, please feel free to contact the public participation office at the details below:

SiVEST Environmental

PO Box 2921, RIVONIA, 2128

Phone: (011) 798 0600

E-mail: sivest ppp@sivest.co.za

Fax: (011) 803 7272

We would like to thank you in anticipation of your active and meaningful contribution to the EIA and public participation processes.

Kind Regards,
Hlengiwe Ntuli
Project Secretary & PPP Administrator
SiVEST Environmental Division

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Kenya Nairob

United Kingdom MBM Consulting: London, England | Tunbridge Wells, England www.mbmconsult.com

From: sivest PPP

Sent: Thursday, 15 December 2022 15:23

Cc: Rendani Rasivhetshele <RendaniR@sivest.com>; Natalie Pullen <NatalieP@sivest.com>

Subject: 16170: Heuweltjies and Kraaltjies Wind Energy Facilities near Beaufort West: DSR Comment Period Starting

Dear Interested and/or Affected Party

NOTICE OF THE SCOPING & ENVIRONMENTAL IMPACT ASSESSMENTS (S&EIAs) FOR THE PROPOSED HEUWELTJIES AND KRAALTJIES WIND ENERGY FACILITIES AND ASSOCIATED INFRASTRUCTURE, NEAR BEAUFORT WEST, WESTERN CAPE PROVINCE

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Kraaltjies WEF – (DFFE Ref No: <u>To be announced</u>)

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I.T.O POPIA, you hereby declare and confirm that you, as an I&AP providing information, consent for your information to be gathered, stored and distributed for the purpose of this project.

Kind Regards,
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Project Secretary & PPP Administrators
SiVEST Environmental Division

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sivest_PPP

From: sivest_PPP

Sent: Friday, 27 January 2023 08:51

Cc: Rendani Rasivhetshele; Natalie Pullen

Subject: FW: 16170: Heuweltjies and Kraaltjies Wind Energy Facilities near Beaufort West: DSR Comment

Period Ending

Attachments: 16170 Beaufort West WEF DSR Notification Letter Rev 1 14122022.pdf

Tracking: Recipient Delivery

Rendani Rasivhetshele

Natalie Pullen Delivered: 27/01/2023 08:55

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'kevinvw@mtnloaded.co.za'

'morgan.griffiths@wessa.co.za'

'BrandonL@elsenburg.com'

'neels.mathee@gmail.com'

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Heuweltjies WEF – (DFFE Ref No: 14/12/16/3/3/2/2263)

Kraaltjies WEF – (DFFE Ref No: 14/12/16/3/3/2/2264)

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SiVEST Environmental

PO Box 2921, RIVONIA, 2128

Phone: (011) 798 0600

E-mail: sivest ppp@sivest.co.za

Fax: (011) 803 7272

We would like to thank you in anticipation of your active and meaningful contribution to the EIA and public participation processes.



Hlengiwe Ntuli

Projects Secretary & PPP Administrator



+27 11 798 0600

From: sivest_PPP

Sent: Tuesday, 17 January 2023 12:15

Cc: Rendani Rasivhetshele <RendaniR@sivest.com>; Natalie Pullen <NatalieP@sivest.com>

Subject: FW: 16170: Heuweltjies and Kraaltjies Wind Energy Facilities near Beaufort West: DSR Comment Period

Starting

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Kenya Nairobi

United Kingdom MBM Consulting: London, England | Tunbridge Wells, England www.mbmconsult.com

From: sivest PPP

Sent: Thursday, 15 December 2022 15:23

Cc: Rendani Rasivhetshele <RendaniR@sivest.com>; Natalie Pullen <NatalieP@sivest.com>

Subject: 16170: Heuweltjies and Kraaltjies Wind Energy Facilities near Beaufort West: DSR Comment Period Starting

Dear Interested and/or Affected Party

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Heuweltjies WEF – (DFFE Ref No: <u>To be announced</u>)

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			09:00-13:00; 14:30- 17:30	
Beaufort West Library	15 Church Beaufort West	Street,	Mondays- Fridays 10:00 – 17:00	023 414 8106

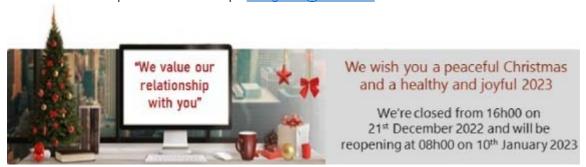
The reports as well as the accompanying appendices are also available on SiVEST's website: http://www.sivest.com/za, click on Downloads, then browse to the folder '16170 Beaufort West Wind Energy Facilities'.

SiVEST is committed to complying with the requirements as set out in terms of POPIA.

I.T.O POPIA, you hereby declare and confirm that you, as an I&AP providing information, consent for your information to be gathered, stored and distributed for the purpose of this project.

Kind Regards,
Hlengiwe Ntuli
Project Secretary & PPP Administrators
SiVEST Environmental Division

D +27 11 798 0690 | T +27 11 798 0600 | E <u>HlengiweN@sivest.com</u>



sivest_PPP

From: sivest_PPP

Sent: Monday, 06 February 2023 08:44
Cc: Rendani Rasivhetshele; Natalie Pullen

Subject: RE: 16170: Heuweltjies and Kraaltjies Wind Energy Facilities near Beaufort West: DSR Comment

Period Ending

Attachments: 16170 Beaufort West WEF DSR Notification Letter Rev 1 14122022.pdf

Tracking: Recipient Delivery

Rendani Rasivhetshele Delivered: 06/02/2023 08:48
Natalie Pullen Delivered: 06/02/2023 08:48

'Ryan David-Andersen'

'Kosie Haarhoff'

'Alana Duffell-Canham'

'Melissa Lewis'

'Amanda Visser'

'Andrew September'

'Annaleen Vorster'

'Adriaan Tiplady'

'Barbara Brown'

'Seoka Lekota'

'John Geeringh'

'Grace Swanepoel'

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'Justin Lesch'

'Johan Koegelenberg'

'Brandon Layman'

'Moses Mahunonyane'

'Stefanus Jooste'

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Phone: (011) 798 0600

E-mail: sivest_ppp@sivest.co.za

Fax: (011) 803 7272

We would like to thank you in anticipation of your active and meaningful contribution to the EIA and public participation processes.

Kind regards,



Hlengiwe Ntuli

Projects Secretary & PPP Administrator

6

+27 11 798 0600

From: sivest_PPP

Sent: Friday, 27 January 2023 08:55

Cc: Rendani Rasivhetshele <RendaniR@sivest.com>; Natalie Pullen <NatalieP@sivest.com>

Subject: FW: 16170: Heuweltjies and Kraaltjies Wind Energy Facilities near Beaufort West: DSR Comment Period

Ending

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Kenya Nairobi

United Kingdom MBM Consulting: London, England | Tunbridge Wells, England www.mbmconsult.com

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-	Beauf	ort West		10:00 – 17:00		

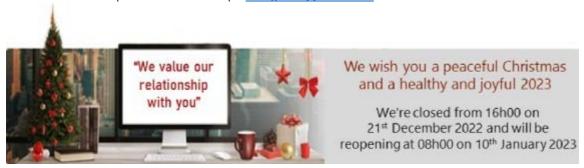
The reports as well as the accompanying appendices are also available on SiVEST's website: http://www.sivest.com/za, click on Downloads, then browse to the folder '16170 Beaufort West Wind Energy Facilities'.

SiVEST is committed to complying with the requirements as set out in terms of POPIA.

I.T.O POPIA, you hereby declare and confirm that you, as an I&AP providing information, consent for your information to be gathered, stored and distributed for the purpose of this project.

Kind Regards,
Hlengiwe Ntuli
Project Secretary & PPP Administrators
SiVEST Environmental Division

D +27 11 798 0690 | T +27 11 798 0600 | E HlengiweN@sivest.com





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

DFFE Reference: 14/12/16/3/3/2/2263
Enquiries: Ms Trisha Pillay
Telephone: (012) 399 9406 E-mail: TPillay@dffe.gov.za

Ms Rendani Rasivhetshele SiVEST SA (Pty) Ltd PO Box 2921 **RIVONIA** 2128

Telephone Number: (011) 798 0634 **Email Address:** rendanir@sivest.com

PER E-MAIL

Dear Ms Rasivhetshele

COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED HEUWELTJIES WIND ENERGY FACILITY (WEF) AND ITS ASSOCIATED INFRASTRUCTURE NEAR BEAUFORT WEST IN THE PRINCE ALBERT LOCAL MUNICIPALITY, CENTRAL KAROO DISTRICT IN THE WESTERN CAPE PROVINCE

The Application for Environmental Authorisation and draft Scoping Report (SR) dated December 2022 and received by the Department on 06 January 2023, refer.

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

(a) Specific Comments

- (i) Please provide a concise, but complete, summary and bullet list of the project description and associated infrastructure (or project scope). This must include a list of all development components and associated infrastructure.
- (ii) Kindly ensure the development footprints (hectares/square metres) and specifications of all proposed infrastructure and associated infrastructure during all phases are included in the final SR.
- (iii) The co-ordinates must be specific to each activity and infrastructure that is proposed on the site. The co-ordinates for substations and the battery energy storage system (BESS) must be included in the report, i.e., we require that you provide us with the specific development footprints for each development parameter, and not an area outlining the entire site.
- (iv) Kindly take note that when finalising the layout plan the position of all proposed infrastructure and linear activities, which includes but not limited to the following must be illustrated:
 - ➤ Wind turbines (the proposed 60 turbines should be numbered on the layout plan);
 - > Access roads and internal roads;
 - Onsite substations:
 - Battery energy storage systems (BESS);
 - > Operation and maintenance buildings; and
 - > Construction camp laydown areas.
- (v) The screening tool indicates that seventeen (17) specialist assessments need to be undertaken or conducted. Only eleven (11) specialist reports are planned to be done. Kindly take note that it is the

- responsibility of the EAP to confirm this list and to motivate in the final SR, the reason for not including any of the identified specialist studies.
- (vi) Kindly peruse the protocols and provide in the SR site sensitivity reports for each theme/study listed, as well as compliance statements for assessments not needed to be conducted based on your site sensitivity verification.
- (vii) The following Appendices under the Application form and Appendices folder do not have any documents uploaded to the folder:
 - > Appendix 4 -List of Authorities in document;
 - > Appendix 6- Coordinates and SG Codes in document; and
 - > Appendix 13-Grid STC.

Please resubmit an amended application form which includes these relevant documents in the folders you are referring too in the final SR.

(b) Listed Activities

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

(c) Layout & Sensitivity Maps

- (i) The final SR must provide coordinate points for the proposed development site (note that if the site has numerous bend points, at each bend point coordinates must be provided) as well as the start, middle and end point of all linear activities.
- (ii) All preferred turbine positions must be clearly numbered. The turbine position numbers must be consistently used in all maps to be included in the reports.
- (iii) Please provide a layout map which indicates the following:
 - a) The proposed position of the 60 wind energy turbines, laydown areas, internal and external roads, substations, BESS, operational and maintenance buildings etc.;
 - b) The proposed WEF and associated infrastructure, overlain by the sensitivity map;
 - c) All supporting onsite infrastructure e.g. roads (existing and proposed);
 - d) The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected;
 - e) Buffer areas; and
 - f) All "no-go" areas.
- (iv) The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure.
- (v) Google maps will not be accepted.

(d) Alternatives

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

(e) Public Participation Process

- (i) Kindly refer to Regulation 3(3) of the EIA Regulations 2014, as amended which stipulates "Unless justified by exceptional circumstances, as agreed to by the competent authority, the proponent and applicant must refrain from conducting any public participation process during the period of 15 December to 5 January." Provide a motivation in the final SR as to the why the newspaper advert was advertised in a local newspaper (namely Die Courier) on 16 December 2022, as this period is to be excluded from conducting any public participation process unless justified by exceptional circumstances.
- (ii) Please provide a brief description under the site photographs in the final SR of where in relation to the site these photos were taken.
- (iii) Comments must be obtained from this Department's Biodiversity Conservation Directorate at BCAdmin@dffe.gov.za.
- (iv) Please ensure that all issues raised and comments received during the circulation of the SR from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final SR, including comments from this Department, and must be incorporated into a Comments and Response Report (CRR).
- (v) Proof of correspondence with the various stakeholders must be included in the final SR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.
- (vi) The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 and 44 of the EIA Regulations 2014, as amended.
- (vii) A comments and response trail report (C&R) must be submitted with the final SR. The C&R report must incorporate all historical comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Annexure 1 of this comments letter. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as "Noted" is not regarded as an adequate response to I&AP's comments.
- (viii) The final SR must provide evidence that all identified and relevant competent authorities have been given an opportunity to comment on the proposed development.

(f) Specialist Assessments

- (i) A detailed description as well as any associated assessments related to the technology required for the Battery Energy Storage System (BESS) must be included in the Plan of Study of the final SR.
- (ii) All Specialist Declaration of Interest forms must be signed by the relevant specialists and attached to the final SR. The forms are available on Department's website (please use the Department's template).
- (iii) The final EIAr and all the attached specialist studies must indicate and adequately assess a consistent number of turbines.
- (iv) The EAP must ensure that the terms of reference for all the identified specialist studies include the following:
 - a) A detailed description of the study's methodology; indication of the locations and descriptions of the development footprint, turbine positions and all other associated infrastructures that they have assessed and are recommending for authorisation.
 - b) Provide a detailed description of all limitations to the studies. All specialist studies must be conducted in the right season and providing that as a limitation will not be allowed.
 - c) Please note that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the 'no-go' areas.
 - d) Should the specialist definition of 'no-go' area differ from the Department's definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.

- All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.
- f) Bird and Bat specialist studies must have support from Birdlife South Africa and SABAA.
- g) Should a specialist recommend specific mitigation measures, these must be clearly indicated.
- (v) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defendable reasons; and were necessary, include further expertise advice.
- (vi) Please ensure that all mitigation recommendations are in line with applicable and most recent guidelines.
- (vii) It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols.
- (viii) As such, the Specialist Declaration of Interest forms must also indicate the scientific organisation registration/member number and status of registration/membership for each specialist.
- (ix) Please also ensure that the final SR includes the Site Verification Report as required by the relevant environmental themes and assessments.
- (x) Please note further that the protocols, if applicable, require certain specialists' to be SACNASP registered. Please ensure that the relevant specialist certificates are attached to the relevant reports.

(g) Cumulative Assessment

- (i) There are several WEFs within a 35km radius of the proposed Heuweltjies WEF. The wake effect should be investigated as the surrounding WEFs may impact on the energy production of the proposed Heuweltjies WEFs may impact on the energy production of the surrounding WEFs. Investigating the potential impacts of the wake effect are imperative to ensure the efficiency and effectiveness of WEF's.
- (ii) A cumulative impact assessment for all identified and assessed impacts must be conducted and indicate the following:
 - a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.
 - b) Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.
 - c) The cumulative impacts significance rating must also inform the need and desirability of the proposed development.
 - d) A cumulative impact environmental statement on whether the proposed development must proceed.

General

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

"If S&EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has been subjected to a public

participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority"

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

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

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

Yours sincerely

Ms Milicent Solomons

Acting Chief Director: Integrated Environmental Authorisations

Department of Forestry, Fisheries and the Environment

Letter signed by: Mr Coenrad Agenbach

Designation: Deputy Director: Priority Infrastructure Projects

Date: 02 February 2023

CC	:	Eugene Marais	South Africa Mainstream Renewable Power Email: eugene.marais@mainstreammrp.com
			Developments (Pty) Ltd
		Zaahir Toefy	WC DEA&DP Email: Zaahir.Toefy@westerncape.gov.za

Annexure 1

Format for Comments and Response Report:

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





References:

16/3/3/6/4/2/1/C3/2/0301/22 (Development Management)
18/2/3/2022-2023 (Development Facilitation)
19/3/2/4/C3/1/DDF0106/22 (Pollution and Chemicals Management)
19/2/5/3/C3/2/WL0200/22 (Waste Management)
19/4/4/1/BB1 – Heuweltjies Wind Farm, Beaufort West (Air Quality Management)

Attention: Ms Rendani Rasivhetshele

SiVEST SA (Pty) Ltd P.O. Box 2921 RIVONIA 2128

sivest ppp@sivest.com

Dear Madam

COMMENTS ON THE DRAFT SCOPING REPORT AND PLAN OF STUDY FOR ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED DEVELOPMENT OF THE 240MW HEUWELTJIES WIND ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE ON THE REMAINDER OF THE FARM WITPOORTJIE NO. 16 AND PORTION 8 OF THE FARM KLIPGAT NO. 114, KLAARSTROOM, PRINCE ALBERT MUNICIPALITY (DFFE REF: 14/12/16/3/3/2/2263)

- 1. The email notification of 15 December 2022 regarding the availability of the Draft Scoping Report ("DSR") refers.
- 2. Please find consolidated comment from various directorates within the Department on the DSR and Plan of Study for Environmental Impact Assessment ("EIA") dated 14 December 2022 that was available for download from the website of the environmental assessment practitioner ("EAP").
- 3. Directorate: Development Management (Region 3) Ms Dorien Werth (Email: Dorien.Werth@westerncape.gov.za; Tel.: (044) 814 2005):
- 3.1. This Directorate agrees with the distribution list of the DSR to organs of state for their comments. Please ensure that you obtain comments from the Breede-Gouritz Catchment Management Agency as early as possible during the EIA process.

- 3.2. In terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") and the NEMA EIA Regulations, 2014 (as amended), the investigation of alternatives is mandatory. It is noted that only layout alternatives for the proposed on-site substation were investigated. Note that the two layout alternatives must be comparatively assessed and reported on in environmental impact reporting ("EIR") phase.
- 3.3. The proposed final layout with environmental sensitivities and exclusion areas based on the various specialists' inputs must be included in the Draft EIA Report.
- 3.4. This Directorate agree with the Plan of Study for EIA as described in the DSR dated 14 December 2022.
- 4. Directorate: Development Facilitation Ms Adri La Meyer (Email: <u>Adri.Lameyer@westerncape.gov.za</u>; Tel.: (021) 483 2887):
- 4.1. Per paragraph 3.2. above, all reasonable and feasible alternatives that have been comparatively assessed and informed by the specialists, must be reported on in the Draft EIA Report. Per regulation 3(1)(h)(i) of Appendix 3 of the NEMA EIA Regulations, 2014 (as amended), an EIA Report must contain a full description of the process followed to reach the proposed development footprint within the approved site, including details of the development footprint alternatives considered.
- 4.2. It is noted that the project site measures 4017.60ha in extent; however, the development footprint (in ha) of the proposed wind energy facility ("WEF") and associated infrastructure in relation to the project site was not provided. The development footprint of each component of the proposed development and the combined development footprint must be indicated in the Draft EIA Report.
- 4.3. It is noted that Activity 14 of Listing Notice 1 of the NEMA EIA Regulations, 2014 (as amended) is applied for the construction of an on-site battery energy storage system ("BESS"). Please note that said activity refers specifically to the <u>development</u> of facilities or infrastructure for the storage of a dangerous good <u>in containers</u>. Please provide more information on the proposed BESS and whether it will consist of dangerous goods to be stored in containers.
- 4.4. In addition, please provide more detail of the impacts and risks associated with the proposed BESS, the preferred BESS technology alternative, whether other technology alternatives have been considered, and why those technology alternatives are not deemed appropriate.
- 4.5. Please amend the proposed layout and site sensitivity maps by clearly indicating the numbered wind turbines. Furthermore, the various specialist studies must be updated to clearly indicate the proposed numbered wind turbines.
- 4.6. Please further amend the various maps and site layouts by indicating the location of the BESS. According to the DSR, the BESS will be located next to the on-site 132kV substation.
- 4.7. Table 26 of the DSR provides a list of renewable energy developments within a 35km radius of the proposed site. The Draft EIA Report and relevant specialist studies must provide a cumulative assessment of the renewable energy developments within a 35km radius of the proposed site.

- 4.8. Further to the above, please note that environmental authorisations were granted by the Department of Forestry, Fisheries and the Environment on 20 June 2022 for Jessa M WEF (14/12/16/3/3/1/2494) and Jessa S WEF (14/12/16/3/3/1/2497), and on 20 May 2022 for Jessa Z WEF (14/12/16/3/3/1/2496), respectively.
- 4.9. According to the Terrestrial Biodiversity Assessment compiled by EnviroSci (Pty) Ltd dated 20 November 2022, "Riverine rabbits are habitat-specific associated with dense patches of riverine bush along seasonal rivers similar to those found downstream of the site. The Riverine rabbit is the only indigenous burrowing species in Africa, and thus requires deep, soft alluvial soils. It is therefore important that the Alluvial Wash Floodplains with riparian areas, which also contain both Lycium and Salsola plant species, a favoured food source for this rabbit, are avoided as far as possible by the proposed development." The Terrestrial Biodiversity Assessment further notes that "Camera traps were deployed for the maximum possible time with important or strategic habitat, thus any images collected will form part of the EIA phase of the assessment". It is therefore assumed that the Terrestrial Biodiversity Assessment will be updated during the EIR phase and will include the results of camera trap monitoring, which will inform if additional management measures for the protection of the Riverine Rabbit are required.
- 5. Directorate: Pollution and Chemicals Management Ms Nabeelah Achmat (Email: Nabeelah.Achmat@westerncape.gov.za; Tel.: (021) 483 8309):
- 5.1. This Directorate notes and supports the recommendation for a stormwater management plan to be developed, as indicated on page 105 of the DSR. It is recommended that this is compiled and included in the Environmental Management Programme ("EMPr") to be released in the next phase of the application.
- 5.2. It has been noted on pages 18 19 of the Aquatic Biodiversity Assessment compiled by EnviroSci (Pty) Ltd dated 20 November 2022 that "three natural aquatic systems were observed within the study area, namely the broader non-perennial rivers (with & without riparian vegetation) and the minor drainage lines. The fine scale delineation of the broader systems was focused on for the proposed wind farm infrastructure, to ensure that turbines, buildings and any new internal access roads (as far as possible) avoided these areas. Due to the nature of the landscape, the small drainage lines are unavoidable, but these must also be avoided by the turbines and buildings. This also includes the previously indicated 20m buffer, used in defining the buildable areas shown later in this report (Sensitivity Assessment)." It is imperative that the buffers and no-go zones are adhered to throughout the life cycle of this project to ensure the watercourses are not negatively impacted upon.
- 5.3. Please note that the EAP's comments in track changes were recorded in the Aquatic Biodiversity Assessment. Please ensure that all specialists' reports are marked as "final" and without track changes during the EIR phase.
- 5.4. This Directorate has no further comments at this stage of the application and awaits the Draft EIA Report and EMPr.

- 6. Directorate: Waste Management Mr Muneeb Baderoon (Email: Muneeb.Baderoon@westerncape.gov.za; Tel.: (021) 483 2965):
- 6.1. The DSR briefly mentions waste removal and littering. Waste management, disposal and waste manifest documentation must be covered in detail for inclusion in the EMPr and must be strictly monitored during inspections and audits that are prescheduled in the EMPr.
- 6.2. Audits of the proposed construction and operation phases must take place according to fixed schedules that are to be included in the EMPr.
- 6.3. The DSR indicates that large areas will be cleared of vegetation during site clearance. Vegetation clearing must be monitored by the environmental control officer. Alien vegetation and other removed vegetation may be taken to a green/garden waste chipping facility for composting or be disposed of at an appropriately licenced facility but may not be disposed of on adjacent land. The Municipality should be consulted for available options to deal with green waste as part of their Organic Waste Diversion Plan.
- 7. Directorate: Air Quality Management Mr Mzolisi Benxa (E-mail: <u>Mzolisi.Benxa@westerncape.gov.za</u>; Tel.: (021) 483 6510):
- 7.1. Noise generated on site from all the proposed activities must comply with the Western Cape Noise Control Regulations published in Provincial Notice 200/2013.
- 7.2. It is noted that the Environmental Noise Impact Assessment compiled by Enviro-Acoustic Research dated November 2022 indicated that the ambient sound level measurements for residual noise level is low and typical of a rural noise district (45 dBA for the daytime period and 35 dBA for the night-time period).
- 7.3. The noise specialist further indicated that the Western Cape Noise Control Regulations and the South African National Standards 10103 do not cater for instances when background noise levels change due to the impact of external forces, such as noise induced by higher wind speeds. The Environmental Noise Impact Assessment proposed to use a night-time noise limit of 42 dBA (periods with low or no winds), and an upper limit of 45 dBA (periods that wind turbines may operate), stating that the wind turbines will only operate during periods of higher wind speeds. This Directorate agrees with the noise specialist's assessment.
- 7.4. The mitigation measures in section 10.4.1 of the Environmental Noise Impact Assessment should be included in the forthcoming EMPr.
- 7.5. Furthermore, the special conditions in section 10.4.2 of the Environmental Noise Impact Assessment should be considered for inclusion in the proposed "conditions for approval" of the forthcoming Draft EIA Report.

The Department reserves the right to revise initial comments and request further information based on any or new information received.

Yours sincerely



pp HEAD OF DEPARTMENT

DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

Letter signed by:

Thea Jordan Date: 6 February 2023

Director: Development Facilitation

Copy to: Ms Trisha Pillay (DFFE)

TPillay@dffe.gov.za



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

Reference: 14/12/16/3/3/2/2263 & 2264 Enquiries: Ms M Rabothata / Mr K Mathetja

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

Ms. Rendani Rasivhetshele SiVEST SA (PTY) Ltd 12 Autumn Road, **Rivonia** 2128

Telephone Number: (+ 27) 11 798 0600 Email Address: rendanir@sivest.com

PER E-MAIL

Dear Ms. Rasivhetshele

COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE HEUWELTJIES AND KRAALTJIES WIND ENERGY FACILITIES (WEF) WITH THEIR ASSOCIATED INFRASTRUCTURE NEAR BEAUFORT WEST IN THE WESTERN CAPE PROVINCE

The Directorate: Biodiversity Conservation reviewed and evaluated the report and does not object the proposed draft Scoping Report & Plan of Study.

It is noted in the report that the High avifaunal Sensitivity classification was confirmed based on the observed presence of Martial Eagle (Globally and Regionally Endangered), Karoo Korhaan (Regionally Near Threatened) and Ludwig's Bustard (Globally and Regionally Endangered) during the field surveys carried out at the project site. Monitoring must be implemented in accordance with BirdLife South Africa/Endangered Wildlife Trust: best-practice guidelines for avian monitoring and impact mitigation at proposed wind energy development sites in southern Africa. The investigations have also confirmed the high bat sensitivity. A bat monitoring program must be developed and be implemented according to the latest South African Bat Assessment Advisory (SABAA) guidelines.

In view of the above identified significant environmental aspects, kindly take note that any development within highly sensitive area that might result with negative significant impacts post mitigation measures is prohibited.

The final report must comply with all the requirements as outlined in the Environmental Impact Assessment (EIA) guideline for renewable energy projects and the Best Practice Guideline for Birds & Solar Energy for assessing and monitoring the impact of solar energy facilities on birds in Southern Africa.



COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE HEUWELTJIES AND KRAALTJIES WIND ENERGY FACILITIES (WEF) WITH THEIR ASSOCIATED INFRASTRUCTURES NEAR BEAUFORT WEST IN THE WESTERN CAPE PROVINCE

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

10ths

Mr. Seoka Lekota

Control Biodiversity Officer Grade B: Biodiversity Conservation

Department of Forestry, Fisheries & the Environment

Letter signed by: Portia Makitla

Designation: Control Biodiversity Officer Grade A

Date: 02/02/2023







Private Bag X08 Wierda Park 0149 20 January 2023

Attention: Hlengiwe Ntuli, Project Secretary & PPP Administrator, SiVEST Environmental Division

Dear Hlengiwe Ntuli

Company name: Sivent

Contact details sivest ppp@sivest.co.za or HlengiweN@sivest.com or 011 798 0600

Response to the Proposed HEUWELTJIES AND KRAALTJIES WIND ENERGY FACILITIES AND ASSOCIATED INFRASTRUCTURE, NEAR BEAUFORT WEST, WESTERN CAPE PROVINCE DFFE reference number....

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

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

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

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

Tel: +27(0)11 372 3600 Fax: +27(0)11 608 4682 Email: ewt@ewt.org.za Web: www.ewt.org.za

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

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







direct risk to collision-prone species across sensitive areas, and an amplified level of disturbance and loss of habitat for wildlife in areas that overlap with WEFs.

The EWT believes that some of the impacts of WEFs can be avoided and reduced using suitable remedial actions and mitigation measures. Accordingly, we recommend four priority measures that must be considered and implemented to ensure minimum impact of wind energy on wildlife, for details of these four priority measures click <a href="https://example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-example.com/here-exa

The <u>National Web-based Environmental Screening Tool</u> is a geographically based web-enabled application that allows a proponent intending to submit an application for environmental authorisation in terms of the Environmental Impact Assessment (EIA) Regulations 2014, as amended, to screen their proposed site for any environmental sensitivity. Based on the proposed footprint of **Heuweltjies and Kraaltjies wind energy facilities and associated infrastructure**, a number of species have been highlighted as potentially occurring in the proposed development area, these include Verreaux's Eagle, martial Eagle and Ludwigs Bustard.

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

Avifaunal Impacts:

- Arguably, six large, globally and/or regionally threatened, impact sensitive species are
 potentially the most heavily affected by wind farming, and are likely to account for much of
 the bird impact profile of any given proposed WEF. Of these, the three large eagle species Verreaux's Eagle Aquila verreauxii, Martial Eagle Polemaetus bellicosus, and Crowned Eagle
 Stephanoeatus coronatus, one vulture species, the Cape Vulture Gyps coprotheres, one
 Harrier species, the Black Harrier Circus and also the Secretarybird and Ludwigs Bustard. The
 latter is impacted more by associated powerline infrastructure than the turbines themselves.
- We highly recommend a shut down on demand system is implemented, either through on the
 ground observers, or automated systems, to shut down turbines when collision prone birds
 enter wind farms and are heading within rotor sweep zones. These species include, but are
 not limited to Martial Eagles, Verreaux's Eagles and Ludwig's Bustards. These species are
 known to occur within the region. This has been highly effective on Excelsior Wind Farm in the
 Western Cape.
- It is critical that no human disturbance associated with any construction activity occurs within these buffers near active breeding eagle nests in the peak breeding period between May and September, i.e. construction vehicles, labourers on foot, etc. All other human disturbance should also be minimized or avoided during this breeding period.

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- Although the power line design will minimise bird electrocution incidents due to satisfactory
 phase clearances, collisions with shield wires or conductors are still likely to occur. With
 regards to the transmission lines fitting Bird Flight Diverters (BFDs) may mitigate collisions
 involving large raptors but it will not mitigate (at all) collisions by Ludwig's Bustard. Due to the
 fact that lines are likely to be handed over to Eskom (for long term management as per
 standard power purchase agreements), they need to be constructed to specification as
 determined by Eskom and fitted with approved BDFs at the Eskom recommended intervals.
- New power lines need to be placed, as far as possible, in areas where linear infrastructure already exists and ideally as close to the existing lines as possible.
- Should new, more effective BDFs come available the developer needs to be ready to procure and fit these. The EWT is in the process of expanding its current long-term line marking experiment near De Aar where a further 4 BFD designs will be tested, specifically to reduce Ludwig's Bustard collisions. If this development proceeds, we urge the developer to contact the EWT Wildlife and Energy programme directly and to participate in this important and ongoing research. In the event that a more effective BFD is identified and approved, this must be applied to the line. Possibly including the replacement of old BFDs where possible.
- Lines need to be seasonally monitored (according to the ESKOM/EWT partnership protocol) for fatalities and these fatalities should be reported to the Eskom/EWT Strategic partnership.
- While the turbine design has not yet been finalised, we recommend that minimum blade tip height be set as high as is possible (even more than the 25 m recommended).

Verreaux's Eagle Collision Risk:

- For Verreaux's Eagles, space use is dependent on not only the distance from an individual eagles nest site, but also the local density or distribution of conspecific nest sites, the topographic slope and the elevation. In line with BLSA (2017) absolute minimum guidance.
 BLSA (2017) in fact recommends 3 km buffers, and these have since been updated to 5.2 km buffers or VERA modeling (Ralston-Paton & Murgatroyd, 2021), although these buffers are briefly discussed they are not implemented.
- The <u>Verreaux's Eagle Risk Assessment (VERA) tool</u> has been developed to reduce Verreaux's Eagle collisions on wind farms. VERA modelling represents the latest available methods for the assessment of wind turbine collision risk potential for Verreaux's Eagles. It has been widely accepted as the primary tool in assessing the spatial distribution of collision risk for this species and has been adopted into the most recent version of Birdlife South Africa's Verreaux's Eagles and Wind Farm guidelines for impact assessments (Ralston-Paton & Murgatroyd, 2021). Although the publication of the guidelines only occurred in 2021, VERA modelling has been

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available in some format since 2018. The first publication on the modelling methods it was made available in January 2021 (Murgatroyd, Bouten, & Amar, 2021), and since then VERA has been applied to 15 wind energy developments.

- VERA uses the locations of Verreaux's Eagle nests and the topography of the site to determine collision risk. The risk is classified into three levels; high, medium and low. It is recommended that as a minimum requirement no turbines should be built within high risk locations. Furthermore, for optimal conservation, medium risk locations should also be avoided by developments, however with additional site-specific specialist input or mitigation methods a limited amount of development in these areas may be permissible (Murgatroyd et al., 2021). These recommendations have since be expanded on in the updated guidelines following the same approach (Ralston-Paton & Murgatroyd, 2021). VERA predicts collision risk for Verreaux's eagles on a 90 x 90m grid square resolution and it is the best tool available for understanding the likely impacts of wind energy development pre-construction. In comparison to circular buffers, it has been used to correctly predict 11 of the 14 collisions which have occurred. Thus we recommend that this tool is applied to the development site to determine turbine layout in a way which minimises risk to this species rather than any circular buffers. This demonstrates a 3 km circular nest buffer to be inadequate and that a dynamic 5.2 km buffer is more realistically required to reduce fatalities. We also know that raptor space use around a nest site is not even or circular.
- The EWT will make the VERA tool available to recalculate buffers and adjust design if required.

Martial Eagle Collision Risk:

• Martial Eagle is notoriously wide-ranging, with internest distances in the central Karoo averaging about 15 km (Boshoff 1993, Machange et al. 2005), and nearest neighbour distances in the Cookhouse area apparently averaging about 19 km. Although such extreme social spacing suggests the need to apply buffers of 8-12 km, recent GPS tracking-based data from breeding adults in the Karoo (G. Tate, pers. comm.) suggest a generic buffer distance of 6 km is probably sufficient, based on the core habitat used by the species derived our tracking data of 19 Martial Eagles across the central and eastern Karoo.

Bat collision risk:

Bats are particularly susceptible to anthropogenic changes because of their low reproductive rate, longevity, and high metabolic rates, limiting their ability to recover from declines and to maintain sustainable populations. Bat fatalities due to wind turbines raise serious concerns about population-level impacts. The main documented direct impacts of wind energy on bats includes fatality via mainly direct collision with turbine blades or less likely by barotrauma. Indirect impacts include roost

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disturbances and/or destruction (if construction, operational or decommissioning activities occur close to bat roosts), destruction of foraging habitat (due to WEF construction and habitat change), displacement of bats from their foraging habitat (bats avoid the WEF area) and obstruction of movement paths to drinking, foraging, roosting and migration sites.

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

General recommendations:

- We further recommend a comprehensive, long-term avifaunal and terrestrial monitoring programme be implemented by an independent qualified service provider (see guidelines in appendix 1). Little is known about terrestrial impacts of large wind developments and as such this project, if approved, will provide an opportunity to measure baselines and changes over time for terrestrial species.
- Avifaunal impacts need to be closely monitored with seasonal line surveys and surveys in the vicinity of turbines.
- The developments will constitute an additional pressure on biodiversity in the area. This runs against the purpose of the conservancies and formal protected areas in the region, that have taken many years of conservation investment to get off the ground. Therefore, the EWT would like to see a commitment to conservation from the developer. A variety of options are available and the developer is welcome to contact the EWT to discuss these.
- Significant adverse impacts can be expected during the construction phase including vehicular collisions with wildlife, collection and cutting of shrubs for firewood, potential snaring, pollution, etc., and as such strict controls and protocols are required during this phase.
- We strongly advise the appointment of an independent consultant to monitor activities during the construction phase and to report issues and non-compliance to the authorities and developer.
- There is seldom evidence of sufficiently robust implementation of the mitigation hierarchy in the process of site selection. Avoidance, which is the first and most important step, must be duly considered as the first priority

The EWT appreciates the opportunity provided by the developer to comment and we look forward to the opportunity to participate in the process of informing the responsible placement of turbines or alternatively avoidance if no environmentally responsible options are available. We would value the opportunity to provide our detailed landscape planning data and to assist through negotiation to inform decision making, but we cannot support high-risk options. We further request that the relevant competent authority and Department of Forestry, Fisheries, and the Environment (DFFE) need to take

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these concerns into consideration, including the associated powerlines and other infrastructure that will be required as a result of the proposed wind energy development.

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

Regards,

Dr Ian Little

Endangered Wildlife Trust

Email: ianL@ewt.org.za Phone: +27 84 240 7341

Reference list

Boshoff, A.F. 1993., Density, active performance and stability of Martial Eagles *Polemaetus bellicosus* active on electricity pylons in the Nama-Karoo, South Africa. In: Wilson, R.T. (Ed.). Proceedings of the Eighth Pan-African Ornithological Congress. Musee Royal de 1'Afrique Centrale, Tervuren. pp 95-104.

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Murgatroyd, M., Bouten, W., & Amar, A. (2021). A predictive model for improving placement of wind turbines to minimise collision risk potential for a large soaring raptor. Journal of Applied Ecology, 1–12.

Ralston-Paton, S., & Murgatroyd, M. (2021). Verreaux's eagle and wind farms: Guidelines for impact assessment, monitoring and mitigation. BirdLife South Africa, Johannesburg, South Africa.

BirdLife South Africa. 2020. Black Harriers and Wind Energy: Guidelines for impact assessment, monitoring, and mitigation (compiled by Simmons RE, Ralston-Paton S, Colyn R and Garcia-Heras M-S).

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DFFE Reference: 14/12/16/3/3/2/2264
Enquiries: Ms Trisha Pillay
Telephone: (012) 399 9406 E-mail: TPillay@dffe.gov.za

Ms Rendani Rasivhetshele SiVEST SA (Pty) Ltd PO Box 2921 **RIVONIA** 2128

Telephone Number: (011) 798 0634 **Email Address:** rendanir@sivest.com

PER E-MAIL

Dear Ms Rasivhetshele

COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED KRAALTJIES WIND ENERGY FACILITY (WEF) AND ITS ASSOCIATED INFRASTRUCTURE NEAR BEAUFORT WEST IN THE BEAUFORT WEST LOCAL MUNICIPALITY IN WESTERN CAPE PROVINCE

The Application for Environmental Authorisation and draft Scoping Report (SR) dated December 2022 and received by the Department on 06 January 2023, refer.

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

(a) Specific Comments

- (i) Please provide a concise, but complete, summary and bullet list of the project description and associated infrastructure (or project scope). This must include a list of all development components and associated infrastructure.
- (ii) Kindly ensure the development footprints (hectares/square metres) and specifications of all proposed infrastructure and associated infrastructure during all phases are included in the final SR.
- (iii) The co-ordinates must be specific to each activity and infrastructure that is proposed on the site. The co-ordinates for substations and the battery energy storage systems (BESS) must be included in the report, i.e., we require that you provide us with the specific development footprints for each development parameter, and not an area outlining the entire site.
- (iv) Kindly take note that when finalising the layout plan the position of all proposed infrastructure and linear activities, which includes but not limited to the following must be illustrated:
 - ➤ Wind turbines (the proposed 60 turbines should be numbered on the layout plan);
 - > Access roads and internal roads;
 - Onsite substations:
 - Battery energy storage systems (BESS);
 - > Operation and maintenance buildings; and
 - > Construction camp laydown areas.
- (v) The screening tool indicates that seventeen (17) specialist assessments need to be undertaken or conducted. Only eleven (11) specialist reports are planned to be done as mentioned on Page XXX (30)

- of the draft SR. Kindly take note that it is the responsibility of the EAP to confirm this list and to motivate in the final SR, the reason for not including any of the identified specialist studies.
- (vi) Kindly peruse the protocols and provide in the final SR site sensitivity reports for each theme/study listed, as well as compliance statements for assessments not needed to be conducted based on your site sensitivity verification.
- (vii) The following Appendices under the Application and Appendices folder do not have any documents uploaded to the folder:
 - > Appendix 4 -List of Authorities in document;
 - Appendix 6- Coordinates and SG Codes in document; and
 - Appendix 13-Grid STC.

Please resubmit an amended application form which includes these relevant documents in the folders you are referring too in the final SR.

(b) Listed Activities

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

(c) Layout & Sensitivity Maps

- (i) Please be advised that the map under Appendix 2 illustrating the proposed preliminary turbine development area and the proposed substation site option 2 are encroaching into areas declared as CBA 1. According to the Western Cape Biodiversity Spatial Plan, 2017, Wind Farms are not compatible land-use activities to be undertaken in areas classified as CBA 1. Therefore, the mitigation hierarchy should be applied in full, and if possible, these areas should be avoided. If these areas cannot be avoided a Biodiversity Offset should be considered to ensure that significant residual impacts of the development are remedied. This must be included and addressed in the Plan of Study of the final SR.
- (ii) The final SR must provide coordinate points for the proposed development site (note that if the site has numerous bend points, at each bend point coordinates must be provided) as well as the start, middle and end point of all linear activities.
- (iii) 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.
- (iv) Please provide a layout map which indicates the following:
 - a) The proposed position of the 60 wind energy turbines, laydown areas, internal and external roads, substations, BESS, operational and maintenance buildings etc.;
 - b) The proposed WEF and associated infrastructure, overlain by the sensitivity map;
 - c) All supporting onsite infrastructure e.g. roads (existing and proposed);
 - The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected;
 - e) Buffer areas; and
 - f) All "no-go" areas.
- (v) The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure.
- (vi) Google maps will not be accepted.

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(d) Alternatives

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

(e) Public Participation Process

- (i) Kindly refer to Regulation 3 (3) of the EIA Regulations 2014, as amended which stipulates "Unless justified by exceptional circumstances, as agreed to by the competent authority, the proponent and applicant must refrain from conducting any public participation process during the period of 15 December to 5 January." Provide a motivation in the final SR as to the why the newspaper advert was advertised in a local newspaper (namely Die Courier) on 16 December 2022, as this period is to be excluded from conducting any public participation process unless justified by exceptional circumstances.
- (ii) Please provide a brief description under the site photographs in the final SR of where in relation to the site these photos were taken.
- (iii) Comments must be obtained from this Department's Biodiversity Conservation Directorate at BCAdmin@dffe.gov.za.
- (iv) Please ensure that all issues raised and comments received during the circulation of the SR from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final SR, including comments from this Department, and must be incorporated into a Comments and Response Report (CRR).
- (v) Proof of correspondence with the various stakeholders must be included in the final SR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.
- (vi) The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 and 44 of the EIA Regulations 2014, as amended.
- (vii) A comments and response trail report (C&R) must be submitted with the final SR. The C&R report must incorporate all historical comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Annexure 1 of this comments letter. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as "Noted" is not regarded as an adequate response to I&AP's comments.
- (viii) The final SR must provide evidence that all identified and relevant competent authorities have been given an opportunity to comment on the proposed development.

(f) Specialist Assessments

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

- a) A detailed description of the study's methodology; indication of the locations and descriptions of the development footprint, turbine positions and all other associated infrastructures that they have assessed and are recommending for authorisation.
- b) Provide a detailed description of all limitations to the studies. All specialist studies must be conducted in the right season and providing that as a limitation will not be allowed.
- c) Please note that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the 'no-go' areas.
- d) Should the specialist definition of 'no-go' area differ from the Department's definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.
- e) All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.
- f) Bird and Bat specialist studies must have support from Birdlife South Africa and SABAA.
- g) Should a specialist recommend specific mitigation measures, these must be clearly indicated.
- (v) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defendable reasons; and were necessary, include further expertise advice.
- (vi) Please ensure that all mitigation recommendations are in line with applicable and most recent guidelines.
- (vii) It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols.
- (viii) As such, the Specialist Declaration of Interest forms must also indicate the scientific organisation registration/member number and status of registration/membership for each specialist.
- (ix) Please also ensure that the final SR includes the Site Verification Report as required by the relevant environmental themes and assessments.
- (x) Please note further that the protocols, if applicable, require certain specialists' to be SACNASP registered. Please ensure that the relevant specialist certificates are attached to the relevant reports.

(g) Cumulative Assessment

- (i) There are several WEFs within a 35km radius of the proposed Kraaltjies WEF. The wake effect should be investigated as the surrounding WEFs may impact on the energy production of the proposed Kraaltjies WEF or the proposed Kraaltjies WEF may impact on the energy production of the surrounding WEFs. Investigating the potential impacts of the wake effect are imperative to ensure the efficiency and effectiveness of WEFs.
- (ii) A cumulative impact assessment for all identified and assessed impacts must be conducted and indicate the following:
 - a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.
 - b) Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.
 - c) The cumulative impacts significance rating must also inform the need and desirability of the proposed development.

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

General

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

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

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

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

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

Yours sincerely

Ms Milicent Solomons

Acting Chief Director: Integrated Environmental Authorisations

Department of Forestry, Fisheries and the Environment

Letter signed by: Mr Coenrad Agenbach

Designation: Deputy Director: Priority Infrastructure Projects

Date: 02 February 2023

CC:	Eugene Marais	South Africa Mainstream F Developments (Pty) Ltd	Renewable Power	Email: eugene.marais@mainstreammrp.com
	Zaahir Toefy	WC DEA&DP		Email: Zaahir.Toefy@westerncape.gov.za

Annexure 1

Format for Comments and Response Report:

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





References:

16/3/3/6/4/2/1/C3/2/0302/22 (Development Management)
18/2/3/2022-2023 (Development Facilitation)
19/3/2/4/C3/1/DDF0107/22 (Pollution and Chemicals Management)
19/2/5/3/C3/2/WL0201/22 (Waste Management)
19/4/4/1/BB1 – Kraaltjies Wind Farm, Beaufort West (Air Quality Management)

Attention: Ms Rendani Rasivhetshele

SiVEST SA (Pty) Ltd P.O. Box 2921 RIVONIA 2128

sivest ppp@sivest.com

Dear Madam

COMMENTS ON THE DRAFT SCOPING REPORT AND PLAN OF STUDY FOR ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED DEVELOPMENT OF THE 240MW KRAALTJIES WIND ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE ON PORTIONS 10 AND 25 OF THE FARM BRITS EIGENDOM NO. 374, BEAUFORT WEST, BEAUFORT WEST MUNICIPALITY (DFFE REF: 14/12/16/3/3/2/2264)

- 1. The email notification of 15 December 2022 regarding the availability of the Draft Scoping Report ("DSR") refers.
- 2. Please find consolidated comment from various directorates within the Department on the DSR and Plan of Study for Environmental Impact Assessment ("EIA") dated 14 December 2022 that was available for download from the website of the environmental assessment practitioner.
- 3. Directorate: Development Management (Region 3) Ms Dorien Werth (Email: Dorien.Werth@westerncape.gov.za; Tel.: (044) 814 2005):
- 3.1. This Directorate agrees with the distribution list of the DSR to organs of state for their comments. Please ensure that you obtain comments from the Breede-Gouritz Catchment Management Agency as early as possible during the EIA process.

- 3.2. In terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") and the NEMA EIA Regulations, 2014 (as amended), the investigation of alternatives is mandatory. It is noted that only layout alternatives for the proposed on-site substation were investigated. Note that the two layout alternatives must be comparatively assessed and reported on in environmental impact reporting ("EIR") phase.
- 3.3. The proposed final layout with environmental sensitivities and exclusion areas based on the various specialists' inputs must be included in the Draft EIA Report.
- 3.4. According to the Pre-Construction Bat Monitoring Scoping Report compiled by EkoVler dated October 2022, it is noted that there is high bat activity in the proposed area and the development must not occur in certain sensitive areas where high bat activity was observed. The potential mitigation measures and bat sensitivity map must be included in the Final Bat Monitoring Report to be released with the Draft EIA Report.
- 3.5. This Directorate agree with the Plan of Study for EIA as described in the DSR dated 14 December 2022.
- 4. Directorate: Development Facilitation Ms Adri La Meyer (Email: <u>Adri.Lameyer@westerncape.gov.za</u>; Tel.: (021) 483 2887):
- 4.1. Per paragraph 3.2. above, all reasonable and feasible alternatives that have been comparatively assessed and informed by the specialists, must be reported on in the Draft EIA Report. Per regulation 3(1)(h)(i) of Appendix 3 of the NEMA EIA Regulations, 2014 (as amended), an EIA Report must contain a full description of the process followed to reach the proposed development footprint within the approved site, including details of the development footprint alternatives considered.
- 4.2. It is noted that the project site measures 3994.9ha in extent; however, the development footprint of the proposed wind energy facility ("WEF") and associated infrastructure in relation to the project site was not provided. The development footprint of each component of the proposed development and the combined development footprint must be indicated in the Draft EIA Report.
- 4.3. It is noted that Activity 14 of Listing Notice 1 of the NEMA EIA Regulations, 2014 (as amended) is applied for the construction of an on-site battery energy storage system ("BESS"). Please note that said activity refers specifically to the <u>development</u> of facilities or infrastructure for the storage of a dangerous good <u>in containers</u>. Please provide more information on the proposed BESS and whether it will consist of dangerous goods to be stored in containers.
- 4.4. In addition, please provide more detail of the impacts and risks associated with the proposed BESS, the preferred BESS technology alternative, whether other technology alternatives have been considered, and why those technology alternatives are not deemed appropriate.
- 4.5. Please amend the proposed layout and site sensitivity maps by clearly indicating the numbered wind turbines. Furthermore, the various specialist studies must be updated to clearly indicate the proposed <u>numbered</u> wind turbines.
- 4.6. Please further amend the various maps and site layouts by indicating the location of the BESS. According to the DSR, the BESS will be located next to the on-site 132kV substation.

- 4.7. Table 25 of the DSR provides a list of renewable energy developments within a 35km radius of the proposed site. The Draft EIA Report and relevant specialist studies must provide a cumulative assessment of the renewable energy developments within a 35km radius of the proposed site.
- 4.8. Further to the above, please note that environmental authorisations were granted by the Department of Forestry, Fisheries and the Environment on 20 June 2022 for Jessa M WEF (14/12/16/3/3/1/2494) and Jessa S WEF (14/12/16/3/3/1/2497), and on 20 May 2022 for Jessa Z WEF (14/12/16/3/3/1/2496), respectively.
- 4.9. According to the Terrestrial Biodiversity Assessment compiled by EnviroSci (Pty) Ltd dated 20 November 2022, "Riverine rabbits are habitat-specific associated with dense patches of riverine bush along seasonal rivers similar to those found downstream of the site. The Riverine rabbit is the only indigenous burrowing species in Africa, and thus requires deep, soft alluvial soils. It is therefore important that the Alluvial Wash Floodplains with riparian areas, which also contain both Lycium and Salsola plant species, a favoured food source for this rabbit, are avoided as far as possible by the proposed development." The Terrestrial Biodiversity Assessment further notes that "Camera traps were deployed for the maximum possible time with important or strategic habitat, thus any images collected will form part of the EIA phase of the assessment". It is therefore assumed that the Terrestrial Biodiversity Assessment will be updated during the EIR phase and will include the results of camera trap monitoring, which will inform if additional management measures for the protection of the Riverine Rabbit are required.
- 5. Directorate: Pollution and Chemicals Management Ms Nabeelah Achmat (Email: Nabeelah.Achmat@westerncape.gov.za; Tel.: (021) 483 8309):
- 5.1. This Directorate notes and supports the recommendations (mitigation measures) indicated for surface water on pages 110 112 of the DSR.
- 5.2. Page 21 of the Aquatic Specialist Report compiled by EnviroSci (Pty) Ltd dated 20 November 2022 indicates "However, except for several new watercourse crossings, within or near existing roads/tracks, the overall layout (buildable area) could avoid the High sensitivity areas shown in Figures 11, with the activities thus located within the Low sensitivity areas according to the DFFE Screening Tool, once the suggested road and building placement has taken place." It is imperative that the buffers and no-go zones are adhered to throughout the lifecycle of the project to ensure the watercourses are not negatively impacted.
- 5.3. This Directorate has no further comments at this stage of the application and awaits the Draft EIA Report and Environmental Management Programme ("EMPr").
- 6. Directorate: Waste Management Mr Gary Arendse (Email: <u>Gary.Arendse@westerncape.gov.za</u>; Tel.: (021) 483 6307):
- 6.1. Should the project generate both general and hazardous waste, emphasis would also have to be placed on the training of staff to distinguish what waste is seen as general and hazardous to prevent the mixing of these waste streams. Separate storage bins/skips must be provided for storage/disposal of general and hazardous waste.

6.2. Please note that any significant event resulting in the spill or leak of hydrocarbons (e.g., petrol, diesel or oil) or any other hazardous solvents into the ground and/or watercourses must be reported to all

relevant authorities.

7. Directorate: Air Quality Management – Mr Mzolisi Benxa (E-mail: Mzolisi.Benxa@westerncape.gov.za;

Tel.: (021) 483 6510):

7.1. Noise generated on site from all the proposed activities must comply with the Western Cape Noise

Control Regulations published in Provincial Notice 200/2013.

7.2. It is noted that the Environmental Noise Impact Assessment compiled by Enviro-Acoustic Research

dated November 2022 indicated that the ambient sound level measurements for residual noise level

is low and typical of a rural noise district (45 dBA for the daytime period and 35 dBA for the night-time

period).

7.3. The noise specialist further indicated that the Western Cape Noise Control Regulations and the South

African National Standards 10103 do not cater for instances when background noise levels change due to the impact of external forces, such as noise induced by higher wind speeds. The Environmental

Noise Impact Assessment proposed to use a night-time noise limit of 42 dBA (periods with low or no

winds), and an upper limit of 45 dBA (periods that wind turbines may operate), stating that the wind

turbines will only operate during periods of higher wind speeds. This Directorate agrees with the noise

specialist's assessment.

7.4. The mitigation measures in section 10.4.1 of the Environmental Noise Impact Assessment should be

included in the forthcoming EMPr.

7.5. Furthermore, the special conditions in section 10.4.2 of the Environmental Noise Impact Assessment

should be considered for inclusion in the proposed "conditions for approval" of the forthcoming Draft

EIA Report.

The Department reserves the right to revise initial comments and request further information based on any

or new information received.

Yours sincerely

Thea Jordan Date: 2023.02.06 16:47:16

DD HEAD OF DEPARTMENT

DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

Letter signed by:

Thea Jordan Date: 6 February 2023

Director: Development Facilitation

Copy to: Ms Trisha Pillay (DFFE)

IPillay@dffe.gov.za



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

Reference: 14/12/16/3/3/2/2263 & 2264 Enquiries: Ms M Rabothata / Mr K Mathetja

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

Ms. Rendani Rasivhetshele SiVEST SA (PTY) Ltd 12 Autumn Road, **Rivonia** 2128

Telephone Number: (+ 27) 11 798 0600 Email Address: rendanir@sivest.com

PER E-MAIL

Dear Ms. Rasivhetshele

COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE HEUWELTJIES AND KRAALTJIES WIND ENERGY FACILITIES (WEF) WITH THEIR ASSOCIATED INFRASTRUCTURE NEAR BEAUFORT WEST IN THE WESTERN CAPE PROVINCE

The Directorate: Biodiversity Conservation reviewed and evaluated the report and does not object the proposed draft Scoping Report & Plan of Study.

It is noted in the report that the High avifaunal Sensitivity classification was confirmed based on the observed presence of Martial Eagle (Globally and Regionally Endangered), Karoo Korhaan (Regionally Near Threatened) and Ludwig's Bustard (Globally and Regionally Endangered) during the field surveys carried out at the project site. Monitoring must be implemented in accordance with BirdLife South Africa/Endangered Wildlife Trust: best-practice guidelines for avian monitoring and impact mitigation at proposed wind energy development sites in southern Africa. The investigations have also confirmed the high bat sensitivity. A bat monitoring program must be developed and be implemented according to the latest South African Bat Assessment Advisory (SABAA) guidelines.

In view of the above identified significant environmental aspects, kindly take note that any development within highly sensitive area that might result with negative significant impacts post mitigation measures is prohibited.

The final report must comply with all the requirements as outlined in the Environmental Impact Assessment (EIA) guideline for renewable energy projects and the Best Practice Guideline for Birds & Solar Energy for assessing and monitoring the impact of solar energy facilities on birds in Southern Africa.



COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE HEUWELTJIES AND KRAALTJIES WIND ENERGY FACILITIES (WEF) WITH THEIR ASSOCIATED INFRASTRUCTURES NEAR BEAUFORT WEST IN THE WESTERN CAPE PROVINCE

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

OCT CO

Mr. Seoka Lekota

Control Biodiversity Officer Grade B: Biodiversity Conservation

Department of Forestry, Fisheries & the Environment

Letter signed by: Portia Makitla

Designation: Control Biodiversity Officer Grade A

Date: 02/02/2023







Private Bag X08 Wierda Park 0149 20 January 2023

Attention: Hlengiwe Ntuli, Project Secretary & PPP Administrator, SiVEST Environmental Division

Dear **Hlengiwe Ntuli**

Company name: Sivent

Contact details sivest ppp@sivest.co.za or HlengiweN@sivest.com or 011 798 0600

Response to the Proposed HEUWELTJIES AND KRAALTJIES WIND ENERGY FACILITIES AND ASSOCIATED INFRASTRUCTURE, NEAR BEAUFORT WEST, WESTERN CAPE PROVINCE DFFE reference number....

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

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

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

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direct risk to collision-prone species across sensitive areas, and an amplified level of disturbance and loss of habitat for wildlife in areas that overlap with WEFs.

The <u>National Web-based Environmental Screening Tool</u> is a geographically based web-enabled application that allows a proponent intending to submit an application for environmental authorisation in terms of the Environmental Impact Assessment (EIA) Regulations 2014, as amended, to screen their proposed site for any environmental sensitivity. Based on the proposed footprint of **Heuweltjies and Kraaltjies wind energy facilities and associated infrastructure**, a number of species have been highlighted as potentially occurring in the proposed development area, these include Verreaux's Eagle, martial Eagle and Ludwigs Bustard.

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

Avifaunal Impacts:

- Arguably, six large, globally and/or regionally threatened, impact sensitive species are
 potentially the most heavily affected by wind farming, and are likely to account for much of
 the bird impact profile of any given proposed WEF. Of these, the three large eagle species Verreaux's Eagle Aquila verreauxii, Martial Eagle Polemaetus bellicosus, and Crowned Eagle
 Stephanoeatus coronatus, one vulture species, the Cape Vulture Gyps coprotheres, one
 Harrier species, the Black Harrier Circus and also the Secretarybird and Ludwigs Bustard. The
 latter is impacted more by associated powerline infrastructure than the turbines themselves.
- We highly recommend a shut down on demand system is implemented, either through on the
 ground observers, or automated systems, to shut down turbines when collision prone birds
 enter wind farms and are heading within rotor sweep zones. These species include, but are
 not limited to Martial Eagles, Verreaux's Eagles and Ludwig's Bustards. These species are
 known to occur within the region. This has been highly effective on Excelsior Wind Farm in the
 Western Cape.
- It is critical that no human disturbance associated with any construction activity occurs within these buffers near active breeding eagle nests in the peak breeding period between May and September, i.e. construction vehicles, labourers on foot, etc. All other human disturbance should also be minimized or avoided during this breeding period.

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- Although the power line design will minimise bird electrocution incidents due to satisfactory
 phase clearances, collisions with shield wires or conductors are still likely to occur. With
 regards to the transmission lines fitting Bird Flight Diverters (BFDs) may mitigate collisions
 involving large raptors but it will not mitigate (at all) collisions by Ludwig's Bustard. Due to the
 fact that lines are likely to be handed over to Eskom (for long term management as per
 standard power purchase agreements), they need to be constructed to specification as
 determined by Eskom and fitted with approved BDFs at the Eskom recommended intervals.
- New power lines need to be placed, as far as possible, in areas where linear infrastructure already exists and ideally as close to the existing lines as possible.
- Should new, more effective BDFs come available the developer needs to be ready to procure and fit these. The EWT is in the process of expanding its current long-term line marking experiment near De Aar where a further 4 BFD designs will be tested, specifically to reduce Ludwig's Bustard collisions. If this development proceeds, we urge the developer to contact the EWT Wildlife and Energy programme directly and to participate in this important and ongoing research. In the event that a more effective BFD is identified and approved, this must be applied to the line. Possibly including the replacement of old BFDs where possible.
- Lines need to be seasonally monitored (according to the ESKOM/EWT partnership protocol) for fatalities and these fatalities should be reported to the Eskom/EWT Strategic partnership.
- While the turbine design has not yet been finalised, we recommend that minimum blade tip height be set as high as is possible (even more than the 25 m recommended).

Verreaux's Eagle Collision Risk:

- For Verreaux's Eagles, space use is dependent on not only the distance from an individual eagles nest site, but also the local density or distribution of conspecific nest sites, the topographic slope and the elevation. In line with BLSA (2017) absolute minimum guidance.
 BLSA (2017) in fact recommends 3 km buffers, and these have since been updated to 5.2 km buffers or VERA modeling (Ralston-Paton & Murgatroyd, 2021), although these buffers are briefly discussed they are not implemented.
- The <u>Verreaux's Eagle Risk Assessment (VERA) tool</u> has been developed to reduce Verreaux's Eagle collisions on wind farms. VERA modelling represents the latest available methods for the assessment of wind turbine collision risk potential for Verreaux's Eagles. It has been widely accepted as the primary tool in assessing the spatial distribution of collision risk for this species and has been adopted into the most recent version of Birdlife South Africa's Verreaux's Eagles and Wind Farm guidelines for impact assessments (Ralston-Paton & Murgatroyd, 2021). Although the publication of the guidelines only occurred in 2021, VERA modelling has been

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available in some format since 2018. The first publication on the modelling methods it was made available in January 2021 (Murgatroyd, Bouten, & Amar, 2021), and since then VERA has been applied to 15 wind energy developments.

- VERA uses the locations of Verreaux's Eagle nests and the topography of the site to determine collision risk. The risk is classified into three levels; high, medium and low. It is recommended that as a minimum requirement no turbines should be built within high risk locations. Furthermore, for optimal conservation, medium risk locations should also be avoided by developments, however with additional site-specific specialist input or mitigation methods a limited amount of development in these areas may be permissible (Murgatroyd et al., 2021). These recommendations have since be expanded on in the updated guidelines following the same approach (Ralston-Paton & Murgatroyd, 2021). VERA predicts collision risk for Verreaux's eagles on a 90 x 90m grid square resolution and it is the best tool available for understanding the likely impacts of wind energy development pre-construction. In comparison to circular buffers, it has been used to correctly predict 11 of the 14 collisions which have occurred. Thus we recommend that this tool is applied to the development site to determine turbine layout in a way which minimises risk to this species rather than any circular buffers. This demonstrates a 3 km circular nest buffer to be inadequate and that a dynamic 5.2 km buffer is more realistically required to reduce fatalities. We also know that raptor space use around a nest site is not even or circular.
- The EWT will make the VERA tool available to recalculate buffers and adjust design if required.

Martial Eagle Collision Risk:

• Martial Eagle is notoriously wide-ranging, with internest distances in the central Karoo averaging about 15 km (Boshoff 1993, Machange et al. 2005), and nearest neighbour distances in the Cookhouse area apparently averaging about 19 km. Although such extreme social spacing suggests the need to apply buffers of 8-12 km, recent GPS tracking-based data from breeding adults in the Karoo (G. Tate, pers. comm.) suggest a generic buffer distance of 6 km is probably sufficient, based on the core habitat used by the species derived our tracking data of 19 Martial Eagles across the central and eastern Karoo.

Bat collision risk:

Bats are particularly susceptible to anthropogenic changes because of their low reproductive rate, longevity, and high metabolic rates, limiting their ability to recover from declines and to maintain sustainable populations. Bat fatalities due to wind turbines raise serious concerns about population-level impacts. The main documented direct impacts of wind energy on bats includes fatality via mainly direct collision with turbine blades or less likely by barotrauma. Indirect impacts include roost

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disturbances and/or destruction (if construction, operational or decommissioning activities occur close to bat roosts), destruction of foraging habitat (due to WEF construction and habitat change), displacement of bats from their foraging habitat (bats avoid the WEF area) and obstruction of movement paths to drinking, foraging, roosting and migration sites.

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

General recommendations:

- We further recommend a comprehensive, long-term avifaunal and terrestrial monitoring programme be implemented by an independent qualified service provider (see guidelines in appendix 1). Little is known about terrestrial impacts of large wind developments and as such this project, if approved, will provide an opportunity to measure baselines and changes over time for terrestrial species.
- Avifaunal impacts need to be closely monitored with seasonal line surveys and surveys in the vicinity of turbines.
- The developments will constitute an additional pressure on biodiversity in the area. This runs against the purpose of the conservancies and formal protected areas in the region, that have taken many years of conservation investment to get off the ground. Therefore, the EWT would like to see a commitment to conservation from the developer. A variety of options are available and the developer is welcome to contact the EWT to discuss these.
- Significant adverse impacts can be expected during the construction phase including vehicular collisions with wildlife, collection and cutting of shrubs for firewood, potential snaring, pollution, etc., and as such strict controls and protocols are required during this phase.
- We strongly advise the appointment of an independent consultant to monitor activities during the construction phase and to report issues and non-compliance to the authorities and developer.
- There is seldom evidence of sufficiently robust implementation of the mitigation hierarchy in the process of site selection. Avoidance, which is the first and most important step, must be duly considered as the first priority

The EWT appreciates the opportunity provided by the developer to comment and we look forward to the opportunity to participate in the process of informing the responsible placement of turbines or alternatively avoidance if no environmentally responsible options are available. We would value the opportunity to provide our detailed landscape planning data and to assist through negotiation to inform decision making, but we cannot support high-risk options. We further request that the relevant competent authority and Department of Forestry, Fisheries, and the Environment (DFFE) need to take

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these concerns into consideration, including the associated powerlines and other infrastructure that will be required as a result of the proposed wind energy development.

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

Regards,

Dr Ian Little

Endangered Wildlife Trust

Email: ianL@ewt.org.za Phone: +27 84 240 7341

Reference list

Boshoff, A.F. 1993., Density, active performance and stability of Martial Eagles *Polemaetus bellicosus* active on electricity pylons in the Nama-Karoo, South Africa. In: Wilson, R.T. (Ed.). Proceedings of the Eighth Pan-African Ornithological Congress. Musee Royal de 1'Afrique Centrale, Tervuren. pp 95-104.

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SOUTH AFRICA MAINSTREAM RENEWABLE POWER DEVELOPMENTS (PTY) LTD

Proposed Development of the Heuweltjies Wind Energy Facility (WEF) and Associated Infrastructure near Beaufort West in the Western Cape Province

Appendix 3E: Comments and Response Report

Issue Date: 17 February 2023

Revision no.: 1.0

Project No. 16170

DFFE Reference Number: 14/12/16/3/3/2/2263

Date:	17 February 2023	
Document Title:	Proposed Development of the Heuweltjies Wind Energy Facility and	
	Associated Infrastructure near Beaufort West in the Western Cape	
	Province.	
Revision Number	1.0	
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Approved By:	Natalie Pullen	
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Client:	South Africa Mainstream Renewable Power Developments (Pty) Ltd	

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SOUTH AFRICA MAINSTREAM RENEWABLE POWER DEVELOPMENTS (PTY) LTD

PROPOSED DEVELOPMENT OF THE HEUWELTJIES WIND ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE NEAR BEAUFORT WEST IN THE WESTERN CAPE PROVINCE.

COMMENTS AND RESPONSES REPORT

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SOUTH AFRICA MAINSTREAM RENEWABLE POWER DEVELOPMENTS (PTY) LTD

PROPOSED DEVELOPMENT OF THE HEUWELTJIES WIND ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE NEAR BEAUFORT WEST IN THE WESTERN CAPE PROVINCE.

COMMENTS AND RESPONSES REPORT

1. INTRODUCTION

The Public Participation Process forms an integral part of the EIA process. It is a mechanism that aids to identify the potential impacts of proposed projects on the biophysical and human environments. Identified Interested and Affected Parties (I&APs) are given an opportunity to comment on the proposed project and make recommendations on mitigation requirements.

The process followed in informing I&APs of the proposed project is outlined in Sections 24(2) (a) and 24(d) of the National Environmental Management Act 107 of 1998 (as amended) and the EIA Regulations 2014 (as amended). This report presents comments received from I&APs and responses provided as part of the 30 day commenting period of the Draft Scoping Assessment Report.

South Africa Mainstream Renewable Power Developments (Pty) Ltd

Prepared By:



Project No.: 16170

Description: Proposed Development of the Heuweltjies WEF & Associated Infrastructure near Beaufort West in the Western Cape

Province.

Revision No.: 1.0

COMMENTS AND RESPONSE TABLE 2.

2.1. COMMENTS ON DRAFT SCOPING ASSESSMENT REPORT

The following issues were raised on the Draft Scoping Assessment Report:

Table 1: Comments and Responses Table

Date of comment, format of comment,	Comment	Response from EAP / Applicant / Specialist
name of organisation / I&AP		
02 February 2023	COMMENTS ON THE DRAFT SCOPING REPORT	Acknowledged, no further action required.
Director: Integrated Environmental	FOR THE PROPOSED HEUWELTJIES WIND	
Authorisations	ENERGY FACILITY (WEF) AND ITS ASSOCIATED	
Department of Forestry, Fisheries and	INFRASTRUCTURE NEAR BEAUFORT WEST IN	
the Environment (DFFE)	THE PRINCE ALBERT LOCAL MUNICIPALITY,	
Ms Trisha Pillay	CENTRAL KAROO DISTRICT IN THE WESTERN	
	CAPE PROVINCE	
	The Application for Environmental Authorisation	
	and draft Scoping Report (SR) dated December	
	2022 and received by the Department on 06	
	January 2023, refer.	
	This letter serves to inform you that the following	
	information must be included to the final SR:	
	Specific Comments	A concise summary and bullet list of the project
	Please provide a concise, but complete, summary	including a list of all development components and
	and bullet list of the project description and	associated infrastructure is included in the final SR.
	associated infrastructure (or project scope). This	(Refer to Section 6.1).
	must include a list of all development components	
	and associated infrastructure.	

South Africa Mainstream Renewable Power Developments (Pty) Ltd

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	 Kindly ensure the development footprints (hectares/square metres) and specifications of all proposed infrastructure and associated infrastructure during all phases are included in the final SR. 	Development footprints have been provided as far as possible. However, are subject to refinements to be undertaken as part of the EIA phase.
	The co-ordinates must be specific to each activity and infrastructure that is proposed on the site. The co-ordinates for substations and the battery energy storage system (BESS) must be included in the report, i.e., we require that you provide us with the specific development footprints for each development parameter, and not an area outlining the entire site.	Noted. When the applicant has designed the layout which will be assessed in the EIA phase, specific coordinates and specific development footprint for each activity and infrastructure will be included in the EIAr. At this stage, the co-ordinates for the substation area have been provided where the BESS and substations will be located.
	 Kindly take note that when finalising the layout plan the position of all proposed infrastructure and linear activities, which includes but not limited to the following must be illustrated: Wind turbines (the proposed 60 turbines should be numbered on the layout plan). Access roads and internal roads. Onsite substations. Battery energy storage systems (BESS). Operation and maintenance buildings; and Construction camp laydown areas. 	When designing the impact phase layout plan once all sensitivities have been taken into account, the position of all proposed infrastructure including the turbine numbers and linear activities, which includes but is not limited to the following as requested will be illustrated: • Wind turbines • Access roads and internal roads. • Onsite substations. • Battery energy storage systems (BESS). • Operation and maintenance buildings; and • Construction camp laydown areas.
	The screening tool indicates that seventeen (17) specialist assessments need to be undertaken or conducted. Only eleven (11) specialist reports are	Refer to table 9 for the updated screening table which confirms the list of assessments to be undertaken and

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	planned to be done. Kindly take note that it is the responsibility of the EAP to confirm this list and to motivate in the final SR, the reason for not including any of the identified specialist studies.	further provides reasons for assessments that will not be undertaken as part of the EIA process.
	Kindly peruse the protocols and provide in the SR site sensitivity reports for each theme/study listed, as well as compliance statements for assessments not needed to be conducted based on your site sensitivity verification.	Please refer to Appendix 6 for site sensitivity reports for each theme/study listed as well as compliance statements where required.
	The following Appendices under the Application form and Appendices folder do not have any documents uploaded to the folder: Appendix 4 -List of Authorities in document. Appendix 6- Coordinates and SG Codes in document; and Appendix 13-Grid STC. Please resubmit an amended application form which includes these relevant documents in the	Acknowledged. Please take note that Appendix 4 does not apply to the proposed site because more than one locality or provincial authority is not involved, and Appendix 6 does not apply either because more than four farms are not affected by the proposed site. A map illustrating the position of the WEF development in relation to the closest REDZ is attached as Appendix 13 . The application has been amended to include all relevant documentation.
	folders you are referring to in the final SR. Listed Activities 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. If the activities applied for in the application form	The Listed Activities applied for are relevant to the proposed Heuweltjies WEF development and can be linked to the development activity or infrastructure in the project description. Activities applied for do not differ from those
	differ from those mentioned in the final SR, an amended application form must be submitted.	mentioned in the final SR, however the application

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	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.	has been amended to include the missing appendix as per the above comment.
	Layout & Sensitivity Maps	Please refer to Section 5 for the coordinate's points
	The final SR must provide coordinate points for the proposed development site (note that if the site has numerous bend points, at each bend point coordinates must be provided) as well as the start, middle and end point of all linear activities.	for the proposed development site. Specific points of the infrastructures will be included in the EIAr
	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.	Once the layout has been finalised taking into account all sensitivities identified in both the scoping and impact phases all proposed turbine locations will be consistently numbered.
	Please provide a layout map which indicates the following: The proposed position of the 60 wind energy turbines, laydown areas, internal and external roads, substations, BESS, operational and maintenance buildings etc. The proposed WEF and associated infrastructure, overlain by the sensitivity map. All supporting onsite infrastructure e.g. roads (existing and proposed);	The layout map which indicates the below requirements will be submitted in the EIA phase, The proposed position of the 60 wind energy turbines, laydown areas, internal and external roads, substations, BESS, operational and maintenance buildings etc. The proposed WEF and associated infrastructure, overlain by the sensitivity map. All supporting onsite infrastructure e.g., roads (existing and proposed);

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	 The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines etc. that will be affected. Buffer areas; and All "no-go" areas. 	 The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines etc. that will be affected. Buffer areas; and All "no-go" areas. Please note the proposed layout for the development of the Heuweltjies WEF will be designed in line with the environmental sensitivities identified during this Scoping Phase. The impact phase layout which avoids identified scoping sensitivities will be made available for assessment and ground-truthing by the independent specialists in the EIA Phase.
	The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure.	The layout map will be overlain with a sensitivity map and a cumulative map which shows the neighbouring RE developments and existing grid infrastructure. (Refer to Figure 50 for a preliminary cumulative map showing identified renewable projects within 35km of Heuweltjies WEF.
	Google maps will not be accepted.	It is noted that Google maps will not be accepted. The EAP has refrained from using such maps.
	Please provide a description of any identified alternatives for the proposed activity that are feasible and reasonable, including the advantages and disadvantages that the proposed activity or alternatives will have on the environment and on the community that may be affected by the activity as per Appendix 2 of GN	The impact phase layout will be made available as a layout alternative for assessment and ground-truthing by the independent specialists in the EIA Phase as well as for commenting. The activity alternatives will be clearly defined including the advantages and disadvantages that the proposed activity or alternative will have on the environment and or the community.

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	R.982 of 2014 (as amended). • Alternatively, you should submit written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 2. Public Participation Process • Kindly refer to Regulation 3(3) of the EIA Regulations 2014, as amended which stipulates "Unless justified by exceptional circumstances, as agreed to by the competent authority, the proponent and applicant must refrain from conducting any public participation process during the period of 15 December to 5 January." • Provide a motivation in the final SR as to the	Should there be no alternatives, a detailed motivation will be submitted. Please refer to Section 14.2 for the Description of alternatives to be further considered in the EIA phase. Regulation 3(3) of the EIA Regulations 2014, as amended which stipulates "Unless justified by exceptional circumstances, as agreed to by the competent authority, the proponent and applicant must refrain from conducting any public participation process during the period of 15 December to 5 January" is noted. The intended public comment period was to run from 14 December 2022 until 05 February 2023 – a 30-day comment period, excluding
	why the newspaper advert was advertised in a local newspaper (namely Die Courier) on 16 December 2022, as this period is to be excluded from conducting any public participation process unless justified by exceptional circumstances.	the period of 15 December 2022 to 05 January 2023. The newspaper, "Die Courier", publication days are on Fridays, which unfortunately fell on the 16 of December 2022. Although the newspaper advert was advertised on the 16 th , the commenting and the public participation dates commenced on the 14 th (excluding the period of 15 December 2022 to 5 January 2023, as mentioned above). The DSR was ready to be uploaded on 14 December 2022 onto the DFFE submission system, however, when we tried uploading, we found that the Department had already closed the system earlier

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		than what was communicated to EAPs on the closure notice signed on 11 November 2022. Please refer to Appendix 5 for the proof of email that was sent to the DFFE to query the online submission system closure time. No response was received from DFFE on 14 December 2022.
		The I&AP notification was distributed and DSR was available on SiVEST's website on 14 December 2022. The advert which was preloaded was published on 16 December 2022.
		Please note that the public commenting period excluded the days of reckoning.
	Please provide a brief description under the site photographs in the final SR of where in relation to the site these photos were taken.	A brief description in relation to the site photos taken has been provided under the site photographs.
	Comments must be obtained from this Department's Biodiversity Conservation Directorate at BCAdmin@dffe.gov.za.	Comments have been obtained from the Directorate: Biodiversity Conservation and responded to in this Comments and Response Report.
	Please ensure that all issues raised, and comments received during the circulation of the SR from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final SR, including comments from this Department, and must be incorporated into a Comments and Response Report (CRR).	All comments received from I&APs and organs of state during the review and comment period of the SR have been included within this C&RR and have been addressed appropriately.

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	Proof of correspondence with the various stakeholders must be included in the final SR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.	Proof of correspondence and attempts to obtain comments from I&APs, organs of state and key stakeholders with the various stakeholders during the Scoping process is included in Appendix 5 of the Final SR.
	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.	The Public Participation Process has been conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.
	A comments and response trail report (C&R) must be submitted with the final SR. The C&R report must incorporate all historical comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Annexure 1 of this comments letter. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as "Noted" is not regarded as an adequate response to I&AP's comments.	A C&RR has been drafted and is included as a separate appendix to the SR. All comments raised have been incorporated. All comments submitted are captured verbatim and not summarised. It is noted that a response such as "Noted" is not regarded as an adequate response to I&AP's comments, therefore the EAP has refrained from using such a response.
	The final SR must provide evidence that all identified and relevant competent authorities have been given an opportunity to comment on the proposed development.	Proof of attempts to obtain comments from all identified and relevant competent authorities is included in Appendix 5 of the SR.

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	A detailed description as well as any associated assessments related to the technology required for the Battery Energy Storage System (BESS) must be included in the Plan of Study of the final SR.	A detailed description as well as any associated assessment related to the technology required for the Battery Energy Storage System has been included in the Plan of Study. Refer to Section 14.1 .
	All Specialist Declaration of Interest forms must be signed by the relevant specialists and attached to the final SR. The forms are available on Department's website (please use the Department's template).	Signed and commissioned specialist declarations, using the Department template have been attached as Appendix 6. The declaration forms have been obtained on the Department's website.
	The final EIAr and all the attached specialist studies must indicate and adequately assess a consistent number of turbines.	The final EIAr and all attached specialist studies will adequately assess a consistent number of turbines based on the layout that will be provided and further assessed in the EIA phase.
	The EAP must ensure that the terms of reference for all the identified specialist studies include the following: • A detailed description of the study's methodology; indication of the locations and descriptions of the development footprint, turbine positions and all other associated infrastructures that they have assessed and are recommending for	The identified specialist studies include a detailed description of the methodology followed as well as an indication of the location and description of the development and all other associated infrastructure provided in the scoping phase. No recommendations regarding recommendations for authorisation have been made as yet, recommendations will be based on the impact phase layout to be assessed in the EIA
	authorisation.	phase.

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	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.	The specialist studies provide a detailed description of the limitations of the studies. All specialist studies included have been conducted in the right seasons.
	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.	The Department's definition of 'no go' areas is noted. This is the same approach is taken by the EAP and specialists.
	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.	The specialist's definition of 'no go' areas does not differ from that of the Department. Please note all nogo zones and buffers as determined by specialists are clearly indicated and will be adhered to by the developer during the impact phase layout design for submission to the Competent Authority for decision making and approval.
	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.	All specialist studies included have been conducted as part of the scoping phase and based on the available information. Detailed assessments will be submitted as part of the EIA phase. Recommendations to be included in the EA will be provided in the EIA phase.
	Bird and Bat specialist studies must have support from Birdlife South Africa and SABAA.	The Bat and Birds specialist studies will be conducted in accordance with the Birdlife South Africa and SABAA guidelines. Furthermore, SABAA and Birdlife South Africa will be included in the database in order for them to comment on the EIA documents.

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	 Should a specialist recommend specific mitigation measures, these must be clearly indicated. 	All recommended mitigation measures provided by the specialists have been indicated in the FSR, further recommendations based on the layout will be indicated in the EIA Report.
	 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. 	No contradicting recommendations were provided by the specialist as part of the scoping phase. This comment is noted and will be taken into consideration during the EIA phase of the process.
	 Please ensure that all mitigation recommendations are in line with applicable and most recent guidelines. 	All mitigation recommendations are in line with applicable and most recent guidelines. This comment is noted and will be taken into consideration during the EIA phase of the process.
	• It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please note that specialist	The specialists' studies have been conducted in accordance with Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and Government Notice No. 1150 of 30 October 2020.

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	assessments must be conducted in accordance with these protocols.	
	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. Please also ensure that the final SR includes the	Signed and commissioned specialist declarations, including scientific organisation registration number and status of registration, are contained in Appendix 6 of the SR. The final SR includes the Site Verification Report as
	Site Verification Report as required by the relevant environmental themes and assessments.	required by the relevant environmental themes and assessments. Refer to Appendix 6
	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.	Signed and commissioned specialist declarations, including SACNASP registration number and status of registration, are contained in Appendix 6 of the SR.

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	 Cumulative Assessment There are several WEFs within a 35km radius of the proposed Heuweltjies WEF. The wake effect should be investigated as the surrounding WEFs may impact on the energy production of the proposed Heuweltjies WEFs may impact on the energy production of the surrounding WEFs. Investigating the potential impacts of the wake effect are imperative to ensure the efficiency and effectiveness of WEF's. A cumulative impact assessment for all identified and assessed impacts must be conducted and indicate the following: 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. 	Acknowledged. A scoping level evaluation of potential cumulative impacts is provided in Section 13.3.1 of the final SR. Renewable energy developments within 35km radius of the proposed development have been identified as detailed in Section 13.3.1 . An assessment of potential cumulative impacts will be undertaken during the EIA phase of the process in accordance with these requirements. The wake effect will be studied outside of the impact assessment process and addressed with the surrounding wind farms as required, should the project become a preferred bidder.

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	 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. 	
	 You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that: 	The SR has been subjected to a 30-day review period and the final SR is submitted within the prescribed timeframe of the Regulations.
	"If S&EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority".	
	You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Scoping reports in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.	The final SR complies with the requirements of Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.

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	 Further note that in terms of Regulation 45 of the EIA Regulations 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7). You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 	The submission of the final SR complies with the prescribed timeframes of the EIA Regulations. The Applicant acknowledges that no activity may commence prior to receipt of the Environmental
	107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.	Authorisation.
02 February 2023 Department of Forestry, Fisheries and the Environment (DFFE) – The Directorate: Biodiversity Conservation Ms M Rabothatha	COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE HEUWELTJIES AND KRAALTJIES WIND ENERGY FACILITIES (WEF) WITH THEIR ASSOCIATED INFRASTRUCTURE NEAR BEAUFORT WEST IN THE WESTERN CAPE PROVINCE. The Directorate: Biodiversity Conservation reviewed and evaluated the report and does not object the proposed draft Scoping Report & Plan of Study.	It is acknowledged that the Directorate: Biodiversity Conservation does not object the proposed draft SR & Plan of Study.
	It is noted in the report that the High avifaunal Sensitivity classification was confirmed based on the observed presence of Martial Eagle (Globally and Regionally Endangered), Karoo Korhaan (Regionally Near Threatened) and Ludwig's Bustard (Globally and	It is acknowledged. Pre-construction Monitoring will be implemented in accordance with BirdLife South Africa/Endangered Wildlife Trust: best-practice guidelines for avian monitoring and impact mitigation

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	Regionally Endangered) during the field surveys carried out at the project site. Monitoring must be implemented in accordance with BirdLife South Africa/Endangered Wildlife Trust: best-practice guidelines for avian monitoring and impact mitigation at proposed wind energy development sites in southern Africa.	at the proposed wind energy development sites in southern Africa.
	The investigations have also confirmed the high bat sensitivity. A bat monitoring program must be developed and be implemented according to the latest South African Bat Assessment Advisory (SABAA) guidelines. The final report must comply with all the requirements as outlined in the Environmental Impact Assessment (EIA) guideline for renewable energy projects and the	It is acknowledged. A bat monitoring program will be developed and implemented according to the latest South African Bat Assessment Advisory (SABAA) guidelines The SR does comply with all the requirements outlined in the EIA guidelines for renewable projects and the Best Practice Guideline for Birds & Wind
	Best Practice Guideline for Birds & Solar Energy for assessing and monitoring the impact of solar energy facilities on birds in Southern Africa.	Energy.
	In view of the above identified significant environmental aspects, kindly take note that any development within highly sensitive area that might result with negative significant impacts post mitigation measures is prohibited.	It is noted that any development within highly sensitive areas (in this case taken to be turbine no-go areas only) that might result in negative significant impacts post-mitigation measures is prohibited. This comment is noted and will be taken into consideration during the EIA phase of the process.
06 February 2023	COMMENTS ON THE DRAFT SCOPING REPORT	Acknowledged, no further action is required.
Department of Environmental Affairs and	AND PLAN OF STUDY FOR ENVIRONMENTAL	
Development Planning (DEADP)	IMPACT ASSESSMENT FOR THE PROPOSED	
,	DEVELOPMENT OF THE 240MW HEUWELTJIES	

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Directorate: Development Management (Region 3) – Ms Dorien Werth (Email: Dorien.Werth@westerncape.gov.za; Tel.: (044) 814 2005):	WIND ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE ON THE REMAINDER OF THE FARM WITPOORTJIE NO. 16 AND PORTION 8 OF THE FARM KLIPGAT NO. 114, KLAARSTROOM, PRINCE ALBERT MUNICIPALITY (DFFE REF:14/12/16/3/3/2/2263). The email notification of 15 December 2022 regarding the availability of the Draft Scoping Report ("DSR") refers.	
	Please find consolidated comment from various directorates within the Department on the DSR and Plan of Study for Environmental Impact Assessment ("EIA") dated 14 December 2022 that was available for download from the website of the environmental assessment practitioner ("EAP").	
	This Directorate agrees with the distribution list of the DSR to organs of state for their comments. Please ensure that you obtain comments from the Breede-Gouritz Catchment Management Agency as early as possible during the EIA process.	It is acknowledged. Comments will be obtained from the Breede-Gouritz Catchment Management Agency during the Scoping & EIA phase.
	In terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") and the NEMA EIA Regulations, 2014 (as amended), the investigation of alternatives is	Acknowledged. Please note the proposed layout for the development of the Heuweltjies WEF will be designed in line with the environmental sensitivities identified during this Scoping Phase. The impact

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	mandatory. It is noted that only layout alternatives for the proposed on-site substation were investigated. Note that the two layout alternatives must be comparatively assessed and reported on in environmental impact reporting ("EIR") phase.	phase facility layout will be made available for assessment and ground-truthing by the independent specialists in the EIA Phase. The layout alternatives will be comparatively assessed and reported on in the EIA Report.
	The proposed final layout with environmental sensitivities and exclusion areas based on the various specialists' inputs must be included in the Draft EIA Report.	The proposed impact phase layout with all identified environmental sensitivities will be included in the Draft EIA Report.
06 February 2023 Department of Environmental Affairs and Development Planning (DEADP) -	This Directorate agree with the Plan of Study for EIA as described in the DSR dated 14 December 2022.	It is noted that the Directorate agrees with the proposed Plan of Study for the EIA phase.
Directorate: Development Facilitation – Ms Adri La Meyer (Email: Adri.Lameyer@westerncape.gov.za. Tel.: (021) 483 2887):	 Per paragraph 3.2. above, all reasonable and feasible alternatives that have been comparatively. assessed and informed by the specialists, must be reported on in the Draft EIA Report. Per regulation 3(1)(h)(i) of Appendix 3 of the NEMA EIA Regulations, 2014 (as amended), an EIA Report must contain. a full description of the process followed to reach the proposed development footprint within the approved site, including details of the development footprint alternatives considered. 	A full description of the process followed to reach the proposed development footprint within the approved site, including details of the development footprint alternatives considered will be detailed and alternatives comparatively assessed in the EIA Report.
	It is noted that the project site measures 4017.60ha in extent; however, the development footprint (in ha) of the proposed wind energy facility ("WEF") and associated infrastructure in	The development footprint of each component of the proposed development and the combined development footprint will be indicated in the Draft EIA Report.

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	relation to the project site was not provided. The development footprint of each component of the proposed development and the combined development footprint must be indicated in the Draft EIA Report.	
	It is noted that Activity 14 of Listing Notice 1 of the NEMA EIA Regulations, 2014 (as amended) is applied for the construction of an on-site battery energy storage system ("BESS"). Please note that said activity refers specifically to the development of facilities or infrastructure for the storage of a dangerous good in containers. Please provide more information on the proposed BESS and whether it will consist of dangerous goods to be stored in containers.	More information on the proposed BESS and whether it will consist of dangerous goods to be stored in containers will be discussed and detailed in the EIA Report.
	In addition, please provide more detail of the impacts and risks associated with the proposed BESS, the preferred BESS technology alternative, whether other technology alternatives have been considered, and why those technology alternatives are not deemed appropriate.	More details of the impacts and risks associated with the proposed BESS will be discussed and detailed in the EIA phase. A description of the proposed BESS technology has now also been provided in the Plan of Study of the FSR.

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	 Please amend the proposed layout and site sensitivity maps by clearly indicating the numbered wind turbines. Furthermore, the various specialist studies must be updated to clearly indicate the proposed numbered wind turbines. Please further amend the various maps and site layouts by indicating the location of the BESS. According to the DSR, the BESS will be located next to the on-site 132kV substation. 	Please note the proposed layout for the development of the Heuweltjies WEF is being designed in line with the environmental sensitivities identified during this Scoping Phase. The impact phase facility layout will be made available for assessment and ground-truthing by the independent specialists in the EIA Phase.
	Table 26 of the DSR provides a list of renewable energy developments within a 35km radius of the proposed site. The Draft EIA Report and relevant specialist studies must provide a cumulative assessment of the renewable energy developments within a 35km radius of the proposed site.	It is acknowledged. The Draft EIA Report and relevant specialist studies will provide a cumulative assessment of the renewable energy developments within a 35km radius of the proposed site.
	• Further to the above, please note that environmental authorisations were granted by the Department of Forestry, Fisheries and the Environment on 20 June 2022 for Jessa M WEF (14/12/16/3/3/1/2494) and Jessa S WEF (14/12/16/3/3/1/2497), and on 20 May 2022 for Jessa Z WEF (14/12/16/3/3/1/2496), respectively.	It is noted, this has been updated in the SR.
	 According to the Terrestrial Biodiversity Assessment compiled by EnviroSci (Pty) Ltd 	Acknowledged. The Terrestrial Biodiversity Assessment will be updated during the EIR phase

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Traine of Organisation / Texas	dated 20 November 2022, "Riverine rabbits are habitat-specific associated with dense patches of riverine bush along seasonal rivers similar to those found downstream of the site. The Riverine rabbit is the only indigenous burrowing species in Africa, and thus requires deep, soft alluvial soils. It is therefore important that the Alluvial Wash Floodplains with riparian areas, which also contain both Lycium and Salsola plant species, a favoured food source for this rabbit, are avoided as far as possible by the proposed development." The Terrestrial Biodiversity Assessment further notes that "Camera traps were deployed for the maximum possible time with important or strategic habitat, thus any images collected will form part of the EIA phase of the assessment". It is therefore assumed that the Terrestrial Biodiversity Assessment will be updated during the EIR phase and will include the results of camera trap monitoring, which will inform if additional management measures for the protection of the Riverine Rabbit are required.	and will include the results of camera trap monitoring, which will inform if additional management measures for the protection of the Riverine Rabbit are required.
Department of Environmental Affairs and	This Directorate notes and supports the	Acknowledged. Stormwater Management Plan will be
Development Planning (DEADP) Directorate: Pollution and Chemicals	recommendation for a stormwater management	developed during the EIA phase and included in the
Management – Ms Nabeelah Achmat	plan to be developed, as indicated on page 105 of the DSR. It is recommended that this is	EMPr but will be finalised based on the final layout following the specialist's final walkthrough.
(Email:	compiled and included in the Environmental	Tollowing the specialist's fillal walktillough.

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Nabeelah.Achmat@westerncape.gov.za;	Management Programme ("EMPr") to be	A stormwater management plan will be developed
Tel.: (021) 483 8309):	released in the next phase of the application.	during the EIA phase but will be finalised and is
		subject to finalised facility, road layouts and final walk
		throughs.
	It has been noted on pages 18 - 19 of the Aquatic	Acknowledged, please note the proposed layout for
	Biodiversity Assessment compiled by EnviroSci	the development of the Heuweltjies WEF will be
	(Pty) Ltd dated 20 November 2022 that "three	designed in line with the environmental sensitivities
	natural aquatic systems were observed within the	identified during this Scoping Phase. The
	study area, namely the broader non-perennial	development footprint will adhere to recommended
	rivers (with & without riparian vegetation) and the	buffers and avoid the identified sensitivities.
	minor drainage lines. The fine scale delineation of	
	the broader systems was focused on for the	
	proposed wind farm infrastructure, to ensure that	
	turbines, buildings and any new internal access	
	roads (as far as possible) avoided these areas.	
	Due to the nature of the landscape, the small	
	drainage lines are unavoidable, but these must	
	also be avoided by the turbines and buildings.	
	This also includes the previously indicated 20m	
	buffer, used in defining the buildable areas shown	
	later in this report (Sensitivity Assessment)." It is	
	imperative that the buffers and no-go zones are	
	adhered to throughout the life cycle of this project	
	to ensure the watercourses are not negatively	
	impacted upon.	
	Please note that the EAP's comments in track	It is noted. All reports will be Final in the EIA phase.
	changes were recorded in the Aquatic	
	Biodiversity Assessment. Please ensure that all	

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	specialists' reports are marked as "final" and without track changes. during the EIR phase.	
	 This Directorate has no further comments at this stage of the application and awaits the Draft EIA Report and EMPr. 	Acknowledged. The Draft EIA Report and associated EMPr will be circulated for commenting purposes.
Department of Environmental Affairs and Development Planning (DEADP) Directorate: Waste Management – Mr Muneeb Baderoon (Email: Muneeb.Baderoon@westerncape.gov.za; Tel.: (021) 483 2965):	The DSR briefly mentions waste removal and littering. Waste management, disposal and waste manifest documentation must be covered in detail for inclusion in the EMPr and must be strictly monitored during inspections and audits that are prescheduled in the EMPr.	Noted. The waste management approach will be covered in detail in the EMPr and Draft EIA Report.
	Audits of the proposed construction and operation phases must take place according to fixed schedules that are to be included in the EMPr.	This comment is noted and will be taken into consideration during the EIA phase of the process.
	The DSR indicates that large areas will be cleared of vegetation during site clearance. Vegetation clearing must be monitored by the environmental control officer. Alien vegetation and other removed vegetation may be taken to a green/garden waste chipping facility for composting or be disposed of at an appropriately licenced facility but may not be disposed of on adjacent land. The Municipality should be consulted for available options to deal with green waste as part of their Organic Waste Diversion Plan.	This comment is noted and will be taken into consideration in the EMPr during the EIA phase of the process.

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Department of Environmental Affairs and Development Planning (DEADP) Directorate: Air Quality Management – Mr Mzolisi Benxa (E-mail: Mzolisi.Benxa@westerncape.gov.za.	 Noise generated on site from all the proposed activities must comply with the Western Cape Noise Control Regulations published in Provincial Notice 200/2013. 	A noise impact assessment has been undertaken for the project. Noise generated on site will comply with the Western Cape Noise Control Regulations published in Provincial Notice 200/2013 and all other relevant guidelines.
Tel.: (021) 483 6510):	It is noted that the Environmental Noise Impact Assessment compiled by Enviro-Acoustic Research dated November 2022 indicated that the ambient sound level measurements for residual noise level is low and typical of a rural noise district (45 dBA for the daytime period and 35 dBA for the night-time period).	Acknowledged. No further action is required.
	The noise specialist further indicated that the Western Cape Noise Control Regulations and the South African National Standards 10103 do not cater for instances when background noise levels change due to the impact of external forces, such as noise induced by higher wind speeds. The Environmental Noise Impact Assessment proposed to use a night-time noise limit of 42 dBA (periods with low or no winds), and an upper limit of 45 dBA (periods that wind turbines may operate), stating that the wind turbines will only operate during periods of higher wind speeds. This Directorate agrees with the noise specialist's assessment.	It is noted that this Directorate agrees with the noise specialist's assessment.

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name of organisation / take	The mitigation measures in section 10.4.1 of the Environmental Noise Impact Assessment should be included in the forthcoming EMPr.	It is noted. The mitigation measures in Section 10.4.1 of the Environmental Noise Impact Assessment will be included in the EMPr during the EIA phase of the project.
	Furthermore, the special conditions in section 10.4.2 of the Environmental Noise Impact Assessment should be considered for inclusion in the proposed "conditions for approval" of the forthcoming Draft EIA Report.	It is noted. The special conditions will be considered for inclusion in the EA based on the assessment of the final layout.
	The Department reserves the right to revise initial comments and request further information based on any or new information received.	It is acknowledged. No further action is required.
20 January2023 Endangered Wildlife Trust Dr Ian Little	Response to the Proposed HEUWELTJIES AND KRAALTJIES WIND ENERGY FACILITIES AND ASSOCIATED INFRASTRUCTURE, NEAR BEAUFORT WEST, WESTERN CAPE PROVINCE DFFE reference number	Acknowledged, no further action is required.
	The Endangered Wildlife Trust (EWT) is a non-governmental, non-profit, conservation organisation, founded in 1973 and operating throughout southern Africa. The EWT conserves threatened species and ecosystems in southern Africa by implementing research and conservation action towards mitigating threats facing species diversity and supporting	

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name of organisation / I&AP	sustainable natural resource management. The EWT furthermore communicates the principles of sustainable living through awareness programmes to the broadest possible constituency for the benefit of the region. The EWT is driven by a team of passionate and dedicated conservationists working through 13 specialised programmes across southern and East Africa, each falling under one of our three key strategic pillars: Saving species, conserving habitats, and benefitting people. • While the EWT supports the just transition to renewable energy, these proposed developments are only considered feasible if they follow the mitigation hierarchy and the species environmental assessment guideline and avoid unnecessary and unsustainable environmental impacts. We further support wind energy but only where all possible options for avoiding, reducing, minimising, and offsetting of impacts (in that order) have been considered and implemented. Please refer to the links embedded in this paragraph for further insight into the EWT's perspectives, concerns, and considerations linked to renewable energy in general, and wind energy in particular. • The demand for energy is increasing globally and	
	Wind Energy Facilities (WEFs) are considered a	

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name of organisation / I&AP	viable option for renewable energy production. There are, however, concerns over the impacts of wind farms on wildlife in three key aspects: the disturbance or displacement of species from their habitats due to the construction of the associated WEF infrastructure; bird and bat collisions with turbine blades; and collisions and electrocutions on energy infrastructure associated with WEFs. This concern is compounded by the potential cumulative impacts of ongoing wind energy developments posing a direct risk to collision-prone species across sensitive areas, and an amplified level of disturbance and loss of habitat for wildlife in areas that overlap with WEFs. • The EWT believes that some of the impacts of WEFs can be avoided and reduced using suitable remedial actions and mitigation measures. Accordingly, we recommend four priority measures that must be considered and implemented to ensure minimum impact of wind energy on wildlife, for details of these four priority measures click here www.ewt.goz.za • The National Web-based Environmental Screening Tool is a geographically based webenabled application that allows a proponent intending to submit an application for environmental authorisation in terms of the Environmental Impact Assessment (EIA)	

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	Regulations 2014, as amended, to screen their proposed site for any environmental sensitivity. Based on the proposed footprint of Heuweltjies and Kraaltjies wind energy facilities and associated infrastructure, a number of species have been highlighted as potentially occurring in the proposed development area, these include Verreaux's Eagle, martial Eagle and Ludwigs Bustard.	
	 In evaluating the above application, we wish to highlight the following impacts and resultant recommendations: It is critical that no human disturbance associated with any construction activity occurs within these buffers near active breeding eagle nests in the peak breeding period between May and September, i.e. construction vehicles, labourers on foot, etc. All other human disturbance should also be minimized or avoided during this breeding period. 	This comment is noted and will be taken into consideration in the EMPr during the EIA phase of the process.
	Although the power line design will minimise bird electrocution incidents due to satisfactory phase clearances, collisions with shield wires or conductors are still likely to occur. With regards to the transmission lines fitting Bird Flight Diverters (BFDs) may mitigate collisions involving large raptors but it will not mitigate (at all) collisions by	It is noted. Powerlines to be handed over to Eskom will be constructed to specification as determined by Eskom and fitted with approved BFDs at the Eskom-recommended intervals.

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	Ludwig's Bustard. Due to the fact that lines are	
	likely to be handed over to Eskom (for long term	
	management as per standard power purchase	
	agreements), they need to be constructed to	
	specification as determined by Eskom and fitted	
	with approved BDFs at the Eskom recommended	
	intervals.	
	New power lines need to be placed, as far as	This comment is noted and will be taken into
	possible, in areas where linear infrastructure	consideration when designing the layout in the EIA
	already exists and ideally as close to the existing	phase of the project.
	lines as possible.	

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	 Avifaunal Impacts: Arguably, six large, globally and/or regionally threatened, impact sensitive species are potentially the most heavily affected by wind farming and are likely to account for much of the bird impact profile of any given proposed WEF. Of these, the three large eagle species - Verreaux's Eagle Aquila verreauxii, Martial Eagle Polemaetus bellicosus, and Crowned Eagle Stephanoeatus coronatus, one vulture species, the Cape Vulture Gyps coprotheres, one Harrier species, the Black Harrier Circus and also the Secretarybird and Ludwigs Bustard. The latter is impacted more by associated powerline infrastructure than the turbines themselves. We highly recommend a shut down on demand system is implemented, either through on the ground observers, or automated systems, to shut down turbines when collision prone birds enter wind farms and are heading within rotor sweep zones. These species include, but are not limited to Martial Eagles, Verreaux's Eagles and Ludwig's Bustards. These species are known to occur within the region. This has been highly effective on Excelsior Wind Farm in the Western Cape. 	The recommendation for shut down on demand is noted, which includes for the following species, but are not limited to Martial Eagles, Verreaux's Eagles and Ludwig's Bustards. The avifaunal specialist will be engaged to obtain specialist opinion on this matter and the relevance and applicability of this measure for the proposed wind farm. This will be addressed in the avifaunal impact phase specialist report accordingly.

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Traine of organisation? Taxit	Should new, more effective BDFs come available the developer needs to be ready to procure and fit these. The EWT is in the process of expanding its current long-term line marking experiment near De Aar where a further 4 BFD designs will be tested, specifically to reduce Ludwig's Bustard collisions. If this development proceeds, we urge the developer to contact the EWT Wildlife and Energy programme directly and to participate in this important and ongoing research. In the event that a more effective BFD is identified and approved, this must be applied to the line. Possibly including the replacement of old BFDs where possible.	This comment is noted. If need be the developer will contact EWT Wildlife.
	Lines need to be seasonally monitored (according to the ESKOM/EWT partnership protocol) for fatalities and these fatalities should be reported to the Eskom/EWT Strategic partnership.	It is noted that where overhead powerlines are constructed that monitoring should take place seasonally and that these fatalities should be reports to the Eskom/EWT Strategic Partnership. This will be undertaken accordingly where applicable to overhead lines and included in the EMPr accordingly.
	While the turbine design has not yet been finalised, we recommend that minimum blade tip height be set as high as is possible (even more than the 25 m recommended).	This comment is noted. The applicant will take this into consideration in the design of the layout.
	 Verreaux's Eagle Collision Risk: For Verreaux's Eagles, space use is dependent on not only the distance from an individual eagle's 	Please note that no Verreaux's Eagle (VE) nests were identified within proximity of the site, therefore the implementation of VE buffers are not relevant nor

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	nest site, but also the local density or distribution of conspecific nest sites, the topographic slope and the elevation. In line with BLSA (2017) absolute minimum guidance. BLSA (2017) in fact recommends 3 km buffers, and these have since been updated to 5.2 km buffers or VERA modelling (Ralston-Paton & Murgatroyd, 2021), although these buffers are briefly discussed they are not implemented.	applicable. As such, these have not been implemented accordingly.
	The Verreaux's Eagle Risk Assessment (VERA) tool has been developed to reduce Verreaux's Eagle collisions on wind farms. VERA modelling represents the latest available methods for the assessment of wind turbine collision risk potential for Verreaux's Eagles. It has been widely accepted as the primary tool in assessing the spatial distribution of collision risk for this species and has been adopted into the most recent version of Birdlife South Africa's Verreaux's Eagles and Wind Farm guidelines for impact assessments (Ralston-Paton & Murgatroyd, 2021). Although the publication of the guidelines only occurred in 2021, VERA modelling has been available in some format since 2018. The first publication on the modelling methods it was made available in January 2021 (Murgatroyd, Bouten, & Amar, 2021), and since then VERA has been applied to 15 wind energy developments.	Acknowledged, no further action is required.

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name of organisation / I&AP	VERA uses the locations of Verreaux's Eagle nests and the topography of the site to determine collision risk. The risk is classified into three levels: high, medium and low. It is recommended that as a minimum requirement no turbines should be built within high-risk locations. Furthermore, for optimal conservation, medium risk locations should also be avoided by developments, however with additional site-specific specialist input or mitigation methods a limited amount of development in these areas may be permissible (Murgatroyd et al., 2021). These recommendations have since be expanded on in the updated guidelines following the same approach (Ralston-Paton & Murgatroyd, 2021). VERA predicts collision risk for Verreaux's eagles on a 90 x 90m grid square resolution and it is the best tool available for understanding the likely impacts of wind energy development pre-construction. In comparison to circular buffers, it has been used to correctly predict 11 of the 14 collisions which have occurred. Thus, we recommend that this tool is applied to the development site to determine turbine layout in a way which minimises risk to this species rather than any circular buffers. This demonstrates a 3 km circular nest buffer to be inadequate and that a dynamic 5.2 km buffer is	A Martial Eagle nest was the only identified Eagle nest within proximity to the site and was buffered accordingly using a circular buffer which is considered appropriate for this species, as recommended and applied in the avifaunal specialist scoping report. Please note that Verreaux's Eagle was only identified as a species that could potentially occur in the broader area. In addition, this species was noted as having a Low likelihood of regular occurrence at the site. No specific sightings were made of the species, nor were any nests identified. As such, the applicability of the VERA model is not deemed appropriate as no known nests occur in proximity to the wind farm.

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	more realistically required to reduce fatalities. We also know that raptor space use around a nest site is not even or circular.	
	The EWT will make the VERA tool available to recalculate buffers and adjust design if required.	Please see the response above.
	 Martial Eagle Collision Risk: Martial Eagle is notoriously wide-ranging, with internest distances in the central Karoo averaging about 15 km (Boshoff 1993, Machange et al. 2005), and nearest neighbour distances in the Cookhouse area apparently averaging about 19 km. Although such extreme social spacing suggests the need to apply buffers of 8-12 km, recent GPS tracking-based data from breeding adults in the Karoo (G. Tate, pers. comm.) suggest a generic buffer distance of 6 km is probably sufficient, based on the core habitat used by the species derived our tracking data of 19 Martial Eagles across the central and eastern Karoo. 	The avifaunal specialist will be engaged to obtain specialist opinion on this matter and the relevance and applicability of this measure for the proposed wind farm. This will be addressed in the avifaunal impact phase specialist report accordingly.
	Bats are particularly susceptible to anthropogenic changes because of their low reproductive rate, longevity, and high metabolic rates, limiting their ability to recover from declines and to maintain sustainable populations. Bat fatalities due to wind	Acknowledged, no further action is required.

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	turbines raise serious concerns about population-level impacts. The main documented direct impacts of wind energy on bats includes fatality via mainly direct collision with turbine blades or less likely by barotrauma. Indirect impacts include roost disturbances and/or destruction (if construction, operational or decommissioning activities occur close to bat roosts), destruction of foraging habitat (due to WEF construction and habitat change), displacement of bats from their foraging habitat (bats avoid the WEF area) and obstruction of movement paths to drinking, foraging, roosting and migration sites. • Impacts of wind turbines on bats vary depending on site selection, specifications of the wind turbines, species occurring in the area, season and time of night. Bat fatalities may outnumber bird fatalities by 10:1 and fatality rates may be affected by turbine size and wind speed (low-wind nights are generally associated with increased fatality). Until we have a better understanding of South African bat population levels and fluxes, bat ecology and migration, it is recommended that a precautionary approach is adopted, and all known bat data are carefully considered. For detailed pre-construction monitoring, operational phase monitoring and mitigation guidelines please click	Acknowledged, no further action is required.

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	General recommendations: • We further recommend a comprehensive, long-term avifaunal and terrestrial monitoring programme be implemented by an independent qualified service provider (see guidelines in appendix 1). Little is known about terrestrial impacts of large wind developments and as such this project, if approved, will provide an opportunity to measure baselines and changes over time for terrestrial species.	The avifaunal and terrestrial specialist will be engaged to obtain specialist opinion on this matter and the relevance and applicability of this measure for the proposed wind farm. This will be addressed in the avifaunal impact phase specialist report accordingly.
	Avifaunal impacts need to be closely monitored with seasonal line surveys and surveys in the vicinity of turbines.	Acknowledged. Monitoring of powerlines will be undertaken accordingly for overhead powerlines (where constructed). In addition, monitoring surveys in the vicinity of turbines will be undertaken in accordance with the latest operation monitoring best practice guidelines and carcass searching requirements for avifauna.
	The developments will constitute an additional pressure on biodiversity in the area. This runs against the purpose of the conservancies and formal protected areas in the region, that have taken many years of conservation investment to get off the ground. Therefore, the EWT would like to see a commitment to conservation from the developer. A variety of options are available, and	This is acknowledged and welcomed. The Developer will contact EWT to explore the variety of options available to gain more insight.

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V	the developer is welcome to contact the EWT to discuss these. • Significant adverse impacts can be expected during the construction phase including vehicular collisions with wildlife, collection and cutting of shrubs for firewood, potential snaring, pollution, etc., and as such strict controls and protocols are required during this phase.	Acknowledged, strict controls and protocols as per the EMPr will be implemented during the construction phase.
	We strongly advise the appointment of an independent consultant to monitor activities during the construction phase and to report issues and non-compliance to the authorities and developer.	An independent consultant will be appointed to monitor activities as part of the Environmental Control Officer duties during the construction phase.
	There is seldom evidence of sufficiently robust implementation of the mitigation hierarchy in the process of site selection. Avoidance, which is the first and most important step, must be duly considered as the first priority.	Acknowledged, the mitigation hierarchy will be considered starting from avoidance.
	The EWT appreciates the opportunity provided by the developer to comment and we look forward to the opportunity to participate in the process of informing the responsible placement of turbines or alternatively avoidance if no environmentally responsible options are_available. We would value the opportunity to provide our detailed landscape planning data and to assist through	Acknowledged. The EIA Report with detailed layout will be subjected to a 30-day review to all interested and affected parties for commenting purposes.

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	negotiation to inform decision making, but we cannot support high-risk options.	
	We further request that the relevant competent authority and Department of Forestry, Fisheries, and the Environment (DFFE) need to take these concerns into consideration, including the associated powerlines and other infrastructure that will be required as a result of the proposed wind energy development.	Acknowledged. All comments received from I&APs and organs of state during the review and comment period of the SR have been included within this C&RR to be submitted to the Competent Authority with the final SR.
	The EWT reserves the right to revise initial comments presented here, if additional information becomes available.	Acknowledged, no further action is required.

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SOUTH AFRICA MAINSTREAM RENEWABLE POWER DEVELOPMENTS (PTY) LTD

Proposed Development of the Heuweltjies Wind Energy Facility and Associated Infrastructure near Beaufort West in the Western Cape Province

Appendix 3E: Comments and Response Report

Issue Date: September 2023

Revision no.: 3.0

Project No. 16170

DFFE Reference Number: 14/12/16/3/3/2/2263

Date:	September 2023	
Document Title:	Proposed Development of the Heuweltjies Wind Energy Facility and	
	Associated Infrastructure near Beaufort West in the Western Cape	
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Revision Number	3.0	
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SOUTH AFRICA MAINSTREAM RENEWABLE POWER DEVELOPMENTS (PTY) LTD

PROPOSED DEVELOPMENT OF THE HEUWELTJIES WIND ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE NEAR BEAUFORT WEST IN THE WESTERN CAPE PROVINCE.

COMMENTS AND RESPONSES REPORT

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COMMENTS AND RESPONSES REPORT

1. INTRODUCTION

The Public Participation Process forms an integral part of the EIA process. It is a mechanism that aids to identify the potential impacts of proposed projects on the biophysical and human environments. Identified Interested and Affected Parties (I&APs) are given an opportunity to comment on the proposed project and make recommendations on mitigation requirements.

The process followed in informing I&APs of the proposed project is outlined in Sections 24(2) (a) and 24(d) of the National Environmental Management Act 107 of 1998 (as amended) and the EIA Regulations 2014 (as amended). This report presents comments received from I&APs and responses provided as part of the 30-day commenting period of the Draft Scoping Assessment Report.

South Africa Mainstream Renewable Power Developments (Pty) Ltd

Prepared By:



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COMMENTS AND RESPONSE TABLE 2.

2.1. COMMENTS ON DRAFT SCOPING ASSESSMENT REPORT

The following issues were raised on the Draft Scoping Assessment Report:

Table 1: Comments and Responses Table

Date of comment, format of comment,	Comment	Response from EAP / Applicant / Specialist
name of organisation / I&AP		
02 February 2023	COMMENTS ON THE DRAFT SCOPING REPORT	Acknowledged, no further action required.
Director: Integrated Environmental	FOR THE PROPOSED HEUWELTJIES WIND	
Authorisations	ENERGY FACILITY (WEF) AND ITS ASSOCIATED	
Department of Forestry, Fisheries and	INFRASTRUCTURE NEAR BEAUFORT WEST IN	
the Environment (DFFE)	THE PRINCE ALBERT LOCAL MUNICIPALITY,	
Ms Trisha Pillay	CENTRAL KAROO DISTRICT IN THE WESTERN	
	CAPE PROVINCE	
	The Application for Environmental Authorisation	
	and draft Scoping Report (SR) dated December	
	2022 and received by the Department on 06	
	January 2023, refer.	
	This letter corres to inform you that the following	
	This letter serves to inform you that the following	
	information must be included to the final SR:	A consist summary and bullet list of the project
	Specific Comments	A concise summary and bullet list of the project
	Please provide a concise, but complete, summary	including a list of all development components and
	and bullet list of the project description and	associated infrastructure is included in the final SR.
	associated infrastructure (or project scope). This	(Refer to Section 6.1).
	must include a list of all development components	
	and associated infrastructure.	

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	 Kindly ensure the development footprints (hectares/square metres) and specifications of all proposed infrastructure and associated infrastructure during all phases are included in the final SR. 	Development footprints have been provided as far as possible. However, are subject to refinements to be undertaken as part of the EIA phase.
	The co-ordinates must be specific to each activity and infrastructure that is proposed on the site. The co-ordinates for substations and the battery energy storage system (BESS) must be included in the report, i.e., we require that you provide us with the specific development footprints for each development parameter, and not an area outlining the entire site.	Noted. When the applicant has designed the layout which will be assessed in the EIA phase, specific coordinates and specific development footprint for each activity and infrastructure will be included in the EIAr. At this stage, the co-ordinates for the substation area have been provided where the BESS and substations will be located.
	Kindly take note that when finalising the layout plan the position of all proposed infrastructure and linear activities, which includes but not limited to the following must be illustrated: Wind turbines (the proposed 60 turbines should be numbered on the layout plan). Access roads and internal roads. Onsite substations. Battery energy storage systems (BESS). Operation and maintenance buildings; and Construction camp laydown areas.	When designing the impact phase layout plan once all sensitivities have been taken into account, the position of all proposed infrastructure including the turbine numbers and linear activities, which includes but is not limited to the following as requested will be illustrated: Wind turbines Access roads and internal roads. Onsite substations. Battery energy storage systems (BESS). Operation and maintenance buildings; and Construction camp laydown areas.
	The screening tool indicates that seventeen (17) specialist assessments need to be undertaken or conducted. Only eleven (11) specialist reports are	Refer to table 9 for the updated screening table which confirms the list of assessments to be undertaken and

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name of organisation / I&AP		Response from EAP / Applicant / Specialist
	planned to be done. Kindly take note that it is the responsibility of the EAP to confirm this list and to motivate in the final SR, the reason for not including any of the identified specialist studies. • Kindly peruse the protocols and provide in the SR	further provides reasons for assessments that will not be undertaken as part of the EIA process. Please refer to Appendix 6 for site sensitivity reports
	site sensitivity reports for each theme/study listed, as well as compliance statements for assessments not needed to be conducted based on your site sensitivity verification.	for each theme/study listed as well as compliance statements where required.
	 The following Appendices under the Application form and Appendices folder do not have any documents uploaded to the folder: Appendix 4 -List of Authorities in document. Appendix 6- Coordinates and SG Codes in document; and Appendix 13-Grid STC. Please resubmit an amended application form which includes these relevant documents in the 	Acknowledged. Please take note that Appendix 4 does not apply to the proposed site because more than one locality or provincial authority is not involved, and Appendix 6 does not apply either because more than four farms are not affected by the proposed site. A map illustrating the position of the WEF development in relation to the closest REDZ is attached as Appendix 13 . The application has been amended to include all relevant documentation.
	folders you are referring to in the final SR. Listed Activities 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. If the activities applied for in the application form differ from those mentioned in the final SR, an	The Listed Activities applied for are relevant to the proposed Heuweltjies WEF development and can be linked to the development activity or infrastructure in the project description. Activities applied for do not differ from those mentioned in the final SR, however the application

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name of organisation / I&AP	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.	has been amended to include the missing appendix as per the above comment.
	The final SR must provide coordinate points for the proposed development site (note that if the site has numerous bend points, at each bend point coordinates must be provided) as well as the start, middle and end point of all linear activities.	Please refer to Section 5 for the coordinate's points for the proposed development site. Specific points of the infrastructures will be included in the EIAr
	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.	Once the layout has been finalised taking into account all sensitivities identified in both the scoping and impact phases all proposed turbine locations will be consistently numbered.
	Please provide a layout map which indicates the following: The proposed position of the 60 wind energy turbines, laydown areas, internal and external roads, substations, BESS, operational and maintenance buildings etc. The proposed WEF and associated infrastructure, overlain by the sensitivity map. All supporting onsite infrastructure e.g. roads (existing and proposed);	The layout map which indicates the below requirements will be submitted in the EIA phase, The proposed position of the 60 wind energy turbines, laydown areas, internal and external roads, substations, BESS, operational and maintenance buildings etc. The proposed WEF and associated infrastructure, overlain by the sensitivity map. All supporting onsite infrastructure e.g., roads (existing and proposed);

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	 The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines etc. that will be affected. Buffer areas; and All "no-go" areas. 	 The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines etc. that will be affected. Buffer areas; and All "no-go" areas. Please note the proposed layout for the development of the Heuweltjies WEF will be designed in line with the environmental sensitivities identified during this Scoping Phase. The impact phase layout which avoids identified scoping sensitivities will be made available for assessment and ground-truthing by the independent specialists in the EIA Phase.
	The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure.	The layout map will be overlain with a sensitivity map and a cumulative map which shows the neighbouring RE developments and existing grid infrastructure. (Refer to Figure 50 for a preliminary cumulative map showing identified renewable projects within 35km of Heuweltjies WEF.
	Google maps will not be accepted.	It is noted that Google maps will not be accepted. The EAP has refrained from using such maps.
	Please provide a description of any identified alternatives for the proposed activity that are feasible and reasonable, including the advantages and disadvantages that the proposed activity or alternatives will have on the environment and on the community that may be affected by the activity as per Appendix 2 of GN	The impact phase layout will be made available as a layout alternative for assessment and ground-truthing by the independent specialists in the EIA Phase as well as for commenting. The activity alternatives will be clearly defined including the advantages and disadvantages that the proposed activity or alternative will have on the environment and or the community.

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	 R.982 of 2014 (as amended). Alternatively, you should submit written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 2. Public Participation Process Kindly refer to Regulation 3(3) of the EIA Regulations 2014, as amended which stipulates "Unless justified by exceptional circumstances, as agreed to by the competent authority, the proponent and applicant must refrain from conducting any public participation process during the period of 15 December to 5 January." Provide a motivation in the final SR as to the why the newspaper advert was advertised in a local newspaper (namely Die Courier) on 16 December 2022, as this period is to be excluded from conducting any public participation process unless justified by exceptional circumstances. 	Should there be no alternatives, a detailed motivation will be submitted. Please refer to Section 14.2 for the Description of alternatives to be further considered in the EIA phase. Regulation 3(3) of the EIA Regulations 2014, as amended which stipulates "Unless justified by exceptional circumstances, as agreed to by the competent authority, the proponent and applicant must refrain from conducting any public participation process during the period of 15 December to 5 January" is noted. The intended public comment period was to run from 14 December 2022 until 05 February 2023 – a 30-day comment period, excluding the period of 15 December 2022 to 05 January 2023. The newspaper, "Die Courier", publication days are on Fridays, which unfortunately fell on the 16 of December 2022. Although the newspaper advert was advertised on the 16th, the commenting and the public participation dates commenced on the 14th (excluding the period of 15 December 2022 to 5 January 2023, as mentioned above). The DSR was ready to be uploaded on 14 December 2022 onto the DFFE submission system, however, when we tried uploading, we found that the Department had already closed the system earlier

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Date of comment, format of comment, name of organisation / I&AP	 Please provide a brief description under the site photographs in the final SR of where in relation to the site these photos were taken. Comments must be obtained from this Department's Biodiversity Conservation Directorate at BCAdmin@dffe.gov.za. Please ensure that all issues raised, and comments received during the circulation of the SR from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final SR, including comments from this Department, and must be incorporated into a Comments and Response Report (CRR). 	than what was communicated to EAPs on the closure notice signed on 11 November 2022. Please refer to Appendix 5 for the proof of email that was sent to the DFFE to query the online submission system closure time. No response was received from DFFE on 14 December 2022. The I&AP notification was distributed and DSR was available on SiVEST's website on 14 December 2022. The advert which was preloaded was published on 16 December 2022. Please note that the public commenting period excluded the days of reckoning. A brief description in relation to the site photos taken has been provided under the site photographs. Comments have been obtained from the Directorate: Biodiversity Conservation and responded to in this Comments and Response Report. All comments received from I&APs and organs of state during the review and comment period of the SR have been included within this C&RR and have been addressed appropriately.

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	 Proof of correspondence with the various stakeholders must be included in the final SR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. 	Proof of correspondence and attempts to obtain comments from I&APs, organs of state and key stakeholders with the various stakeholders during the Scoping process is included in Appendix 5 of the Final SR.
	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.	The Public Participation Process has been conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.
	A comments and response trail report (C&R) must be submitted with the final SR. The C&R report must incorporate all historical comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Annexure 1 of this comments letter. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as "Noted" is not regarded as an adequate response to I&AP's comments.	A C&RR has been drafted and is included as a separate appendix to the SR. All comments raised have been incorporated. All comments submitted are captured verbatim and not summarised. It is noted that a response such as "Noted" is not regarded as an adequate response to I&AP's comments, therefore the EAP has refrained from using such a response.
	The final SR must provide evidence that all identified and relevant competent authorities have been given an opportunity to comment on the proposed development.	Proof of attempts to obtain comments from all identified and relevant competent authorities is included in Appendix 5 of the SR.

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	A detailed description as well as any associated assessments related to the technology required for the Battery Energy Storage System (BESS) must be included in the Plan of Study of the final SR.	A detailed description as well as any associated assessment related to the technology required for the Battery Energy Storage System has been included in the Plan of Study. Refer to Section 14.1 .
	All Specialist Declaration of Interest forms must be signed by the relevant specialists and attached to the final SR. The forms are available on Department's website (please use the Department's template).	Signed and commissioned specialist declarations, using the Department template have been attached as Appendix 6. The declaration forms have been obtained on the Department's website.
	The final EIAr and all the attached specialist studies must indicate and adequately assess a consistent number of turbines.	The final EIAr and all attached specialist studies will adequately assess a consistent number of turbines based on the layout that will be provided and further assessed in the EIA phase.
	The EAP must ensure that the terms of reference for all the identified specialist studies include the following: • A detailed description of the study's methodology; indication of the locations and descriptions of the development footprint, turbine positions and all other associated infrastructures that they have	The identified specialist studies include a detailed description of the methodology followed as well as an indication of the location and description of the development and all other associated infrastructure provided in the scoping phase. No recommendations regarding recommendations for authorisation have been made as yet, recommendations will be based on
	assessed and are recommending for authorisation.	the impact phase layout to be assessed in the EIA phase.

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	 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. 	The specialist studies provide a detailed description of the limitations of the studies. All specialist studies included have been conducted in the right seasons.
	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.	The Department's definition of 'no go' areas is noted. This is the same approach is taken by the EAP and specialists.
	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.	The specialist's definition of 'no go' areas does not differ from that of the Department. Please note all nogo zones and buffers as determined by specialists are clearly indicated and will be adhered to by the developer during the impact phase layout design for submission to the Competent Authority for decision making and approval.
	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.	All specialist studies included have been conducted as part of the scoping phase and based on the available information. Detailed assessments will be submitted as part of the EIA phase. Recommendations to be included in the EA will be provided in the EIA phase.
	Bird and Bat specialist studies must have support from Birdlife South Africa and SABAA.	The Bat and Birds specialist studies will be conducted in accordance with the Birdlife South Africa and SABAA guidelines. Furthermore, SABAA and Birdlife South Africa will be included in the database in order for them to comment on the EIA documents.

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	Should a specialist recommend specific mitigation measures, these must be clearly indicated.	All recommended mitigation measures provided by the specialists have been indicated in the FSR, further recommendations based on the layout will be indicated in the EIA Report.
	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.	No contradicting recommendations were provided by the specialist as part of the scoping phase. This comment is noted and will be taken into consideration during the EIA phase of the process.
	 Please ensure that all mitigation recommendations are in line with applicable and most recent guidelines. 	All mitigation recommendations are in line with applicable and most recent guidelines. This comment is noted and will be taken into consideration during the EIA phase of the process.
	• It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please note that specialist	The specialists' studies have been conducted in accordance with Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and Government Notice No. 1150 of 30 October 2020.

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	assessments must be conducted in accordance with these protocols.	
	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. Please also ensure that the final SR includes the	Signed and commissioned specialist declarations, including scientific organisation registration number and status of registration, are contained in Appendix 6 of the SR. The final SR includes the Site Verification Report as
	Site Verification Report as required by the relevant environmental themes and assessments.	required by the relevant environmental themes and assessments. Refer to Appendix 6
	 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. 	Signed and commissioned specialist declarations, including SACNASP registration number and status of registration, are contained in Appendix 6 of the SR.

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	Cumulative Assessment There are several WEFs within a 35km radius of the proposed Heuweltjies WEF. The wake effect should be investigated as the surrounding WEFs may impact on the energy production of the proposed Heuweltjies WEFs may impact on the energy production of the surrounding WEFs. Investigating the potential impacts of the wake effect are imperative to ensure the efficiency and effectiveness of WEF's. A cumulative impact assessment for all identified and assessed impacts must be conducted and indicate the following: 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.	Acknowledged. A scoping level evaluation of potential cumulative impacts is provided in Section 13.3.1 of the final SR. Renewable energy developments within 35km radius of the proposed development have been identified as detailed in Section 13.3.1. An assessment of potential cumulative impacts will be undertaken during the EIA phase of the process in accordance with these requirements. The wake effect will be studied outside of the impact assessment process and addressed with the surrounding wind farms as required, should the project become a preferred bidder.

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	 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. 	
	 You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that: 	The SR has been subjected to a 30-day review period and the final SR is submitted within the prescribed timeframe of the Regulations.
	"If S&EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority".	
	You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Scoping reports in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.	The final SR complies with the requirements of Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.

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	• Further note that in terms of Regulation 45 of the EIA Regulations 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).	The submission of the final SR complies with the prescribed timeframes of the EIA Regulations.
	 You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department. 	The Applicant acknowledges that no activity may commence prior to receipt of the Environmental Authorisation.
02 February 2023 Department of Forestry, Fisheries and the Environment (DFFE) – The Directorate: Biodiversity Conservation Ms M Rabothatha	COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE HEUWELTJIES AND KRAALTJIES WIND ENERGY FACILITIES (WEF) WITH THEIR ASSOCIATED INFRASTRUCTURE NEAR BEAUFORT WEST IN THE WESTERN CAPE PROVINCE. The Directorate: Biodiversity Conservation reviewed and evaluated the report and does not object the proposed draft Scoping Report & Plan of Study.	It is acknowledged that the Directorate: Biodiversity Conservation does not object the proposed draft SR & Plan of Study.
	It is noted in the report that the High avifaunal Sensitivity classification was confirmed based on the observed presence of Martial Eagle (Globally and Regionally Endangered), Karoo Korhaan (Regionally Near Threatened) and Ludwig's Bustard (Globally and	It is acknowledged. Pre-construction Monitoring will be implemented in accordance with BirdLife South Africa/Endangered Wildlife Trust: best-practice guidelines for avian monitoring and impact mitigation

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	Regionally Endangered) during the field surveys carried out at the project site. Monitoring must be implemented in accordance with BirdLife South Africa/Endangered Wildlife Trust: best-practice guidelines for avian monitoring and impact mitigation at proposed wind energy development sites in southern Africa.	at the proposed wind energy development sites in southern Africa.
	The investigations have also confirmed the high bat sensitivity. A bat monitoring program must be developed and be implemented according to the latest South African Bat Assessment Advisory (SABAA) guidelines.	It is acknowledged. A bat monitoring program will be developed and implemented according to the latest South African Bat Assessment Advisory (SABAA) guidelines
	The final report must comply with all the requirements as outlined in the Environmental Impact Assessment (EIA) guideline for renewable energy projects and the Best Practice Guideline for Birds & Solar Energy for assessing and monitoring the impact of solar energy facilities on birds in Southern Africa.	The SR does comply with all the requirements outlined in the EIA guidelines for renewable projects and the Best Practice Guideline for Birds & Wind Energy.
	In view of the above identified significant environmental aspects, kindly take note that any development within highly sensitive area that might result with negative significant impacts post mitigation measures is prohibited.	It is noted that any development within highly sensitive areas (in this case taken to be turbine no-go areas only) that might result in negative significant impacts post-mitigation measures is prohibited. This comment is noted and will be taken into consideration during the EIA phase of the process.
06 February 2023	COMMENTS ON THE DRAFT SCOPING REPORT	Acknowledged, no further action is required.
Department of Environmental Affairs and	AND PLAN OF STUDY FOR ENVIRONMENTAL	
Development Planning (DEADP)	IMPACT ASSESSMENT FOR THE PROPOSED	
,	DEVELOPMENT OF THE 240MW HEUWELTJIES	

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Directorate: Development Management (Region 3) – Ms Dorien Werth (Email: Dorien.Werth@westerncape.gov.za; Tel.: (044) 814 2005):	WIND ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE ON THE REMAINDER OF THE FARM WITPOORTJIE NO. 16 AND PORTION 8 OF THE FARM KLIPGAT NO. 114, KLAARSTROOM, PRINCE ALBERT MUNICIPALITY (DFFE REF:14/12/16/3/3/2/2263). The email notification of 15 December 2022 regarding the availability of the Draft Scoping Report ("DSR") refers.	
	Please find consolidated comment from various directorates within the Department on the DSR and Plan of Study for Environmental Impact Assessment ("EIA") dated 14 December 2022 that was available for download from the website of the environmental assessment practitioner ("EAP").	
	This Directorate agrees with the distribution list of the DSR to organs of state for their comments. Please ensure that you obtain comments from the Breede-Gouritz Catchment Management Agency as early as possible during the EIA process.	It is acknowledged. Comments will be obtained from the Breede-Gouritz Catchment Management Agency during the Scoping & EIA phase.
	In terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") and the NEMA EIA Regulations, 2014 (as amended), the investigation of alternatives is	Acknowledged. Please note the proposed layout for the development of the Heuweltjies WEF will be designed in line with the environmental sensitivities identified during this Scoping Phase. The impact

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	mandatory. It is noted that only layout alternatives for the proposed on-site substation were investigated. Note that the two layout alternatives must be comparatively assessed and reported on in environmental impact reporting ("EIR") phase.	phase facility layout will be made available for assessment and ground-truthing by the independent specialists in the EIA Phase. The layout alternatives will be comparatively assessed and reported on in the EIA Report.
	The proposed final layout with environmental sensitivities and exclusion areas based on the various specialists' inputs must be included in the Draft EIA Report.	The proposed impact phase layout with all identified environmental sensitivities will be included in the Draft EIA Report.
06 February 2023 Department of Environmental Affairs and Development Planning (DEADP) -	This Directorate agree with the Plan of Study for EIA as described in the DSR dated 14 December 2022.	It is noted that the Directorate agrees with the proposed Plan of Study for the EIA phase.
Directorate: Development Facilitation – Ms Adri La Meyer (Email: Adri.Lameyer@westerncape.gov.za. Tel.: (021) 483 2887):	 Per paragraph 3.2. above, all reasonable and feasible alternatives that have been comparatively. assessed and informed by the specialists, must be reported on in the Draft EIA Report. Per regulation 3(1)(h)(i) of Appendix 3 of the NEMA EIA Regulations, 2014 (as amended), an EIA Report must contain. a full description of the process followed to reach the proposed development footprint within the approved site, including details of the development footprint alternatives considered. 	A full description of the process followed to reach the proposed development footprint within the approved site, including details of the development footprint alternatives considered will be detailed and alternatives comparatively assessed in the EIA Report.
	It is noted that the project site measures 4017.60ha in extent; however, the development footprint (in ha) of the proposed wind energy facility ("WEF") and associated infrastructure in	The development footprint of each component of the proposed development and the combined development footprint will be indicated in the Draft EIA Report.

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	relation to the project site was not provided. The development footprint of each component of the proposed development and the combined development footprint must be indicated in the Draft EIA Report.	
	It is noted that Activity 14 of Listing Notice 1 of the NEMA EIA Regulations, 2014 (as amended) is applied for the construction of an on-site battery energy storage system ("BESS"). Please note that said activity refers specifically to the development of facilities or infrastructure for the storage of a dangerous good in containers. Please provide more information on the proposed BESS and whether it will consist of dangerous goods to be stored in containers.	More information on the proposed BESS and whether it will consist of dangerous goods to be stored in containers will be discussed and detailed in the EIA Report.
	In addition, please provide more detail of the impacts and risks associated with the proposed BESS, the preferred BESS technology alternative, whether other technology alternatives have been considered, and why those technology alternatives are not deemed appropriate.	More details of the impacts and risks associated with the proposed BESS will be discussed and detailed in the EIA phase. A description of the proposed BESS technology has now also been provided in the Plan of Study of the FSR.

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	 Please amend the proposed layout and site sensitivity maps by clearly indicating the numbered wind turbines. Furthermore, the various specialist studies must be updated to clearly indicate the proposed numbered wind turbines. Please further amend the various maps and site layouts by indicating the location of the BESS. According to the DSR, the BESS will be located next to the on-site 132kV substation. 	Please note the proposed layout for the development of the Heuweltjies WEF is being designed in line with the environmental sensitivities identified during this Scoping Phase. The impact phase facility layout will be made available for assessment and ground-truthing by the independent specialists in the EIA Phase.
	Table 26 of the DSR provides a list of renewable energy developments within a 35km radius of the proposed site. The Draft EIA Report and relevant specialist studies must provide a cumulative assessment of the renewable energy developments within a 35km radius of the proposed site.	It is acknowledged. The Draft EIA Report and relevant specialist studies will provide a cumulative assessment of the renewable energy developments within a 35km radius of the proposed site.
	• Further to the above, please note that environmental authorisations were granted by the Department of Forestry, Fisheries and the Environment on 20 June 2022 for Jessa M WEF (14/12/16/3/3/1/2494) and Jessa S WEF (14/12/16/3/3/1/2497), and on 20 May 2022 for Jessa Z WEF (14/12/16/3/3/1/2496), respectively.	It is noted, this has been updated in the SR.
	According to the Terrestrial Biodiversity Assessment compiled by EnviroSci (Pty) Ltd	Acknowledged. The Terrestrial Biodiversity Assessment will be updated during the EIR phase

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	dated 20 November 2022, "Riverine rabbits are	and will include the results of camera trap monitoring,
	habitat-specific associated with dense patches of	which will inform if additional management measures
	riverine bush along seasonal rivers similar to	for the protection of the Riverine Rabbit are required.
	those found downstream of the site. The Riverine	
	rabbit is the only indigenous burrowing species in	
	Africa, and thus requires deep, soft alluvial soils.	
	It is therefore important that the Alluvial Wash	
	Floodplains with riparian areas, which also	
	contain both Lycium and Salsola plant species, a	
	favoured food source for this rabbit, are avoided	
	as far as possible by the proposed development."	
	The Terrestrial Biodiversity Assessment further	
	notes that "Camera traps were deployed for the	
	maximum possible time with important or	
	strategic habitat, thus any images collected will	
	form part of the EIA phase of the assessment". It	
	is therefore assumed that the Terrestrial	
	Biodiversity Assessment will be updated during	
	the EIR phase and will include the results of	
	camera trap monitoring, which will inform if	
	additional management measures for the	
	protection of the Riverine Rabbit are required.	
Department of Environmental Affairs and	This Directorate notes and supports the	Acknowledged. Stormwater Management Plan will be
Development Planning (DEADP)	recommendation for a stormwater management	developed during the EIA phase and included in the
Directorate: Pollution and Chemicals	plan to be developed, as indicated on page 105	EMPr but will be finalised based on the final layout
Management - Ms Nabeelah Achmat	of the DSR. It is recommended that this is	following the specialist's final walkthrough.
(Email:	compiled and included in the Environmental	

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Nabeelah.Achmat@westerncape.gov.za; Tel.: (021) 483 8309):	Management Programme ("EMPr") to be released in the next phase of the application.	A stormwater management plan will be developed during the EIA phase but will be finalised and is subject to finalised facility, road layouts and final walk throughs.
	It has been noted on pages 18 - 19 of the Aquatic Biodiversity Assessment compiled by EnviroSci (Pty) Ltd dated 20 November 2022 that "three natural aquatic systems were observed within the study area, namely the broader non-perennial rivers (with & without riparian vegetation) and the minor drainage lines. The fine scale delineation of the broader systems was focused on for the proposed wind farm infrastructure, to ensure that turbines, buildings and any new internal access roads (as far as possible) avoided these areas. Due to the nature of the landscape, the small drainage lines are unavoidable, but these must also be avoided by the turbines and buildings. This also includes the previously indicated 20m buffer, used in defining the buildable areas shown later in this report (Sensitivity Assessment)." It is imperative that the buffers and no-go zones are adhered to throughout the life cycle of this project to ensure the watercourses are not negatively impacted upon.	Acknowledged, please note the proposed layout for the development of the Heuweltjies WEF will be designed in line with the environmental sensitivities identified during this Scoping Phase. The development footprint will adhere to recommended buffers and avoid the identified sensitivities.
	Please note that the EAP's comments in track changes were recorded in the Aquatic Biodiversity Assessment. Please ensure that all	It is noted. All reports will be Final in the EIA phase.

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	specialists' reports are marked as "final" and without track changes. during the EIR phase.	
	 This Directorate has no further comments at this stage of the application and awaits the Draft EIA Report and EMPr. 	Acknowledged. The Draft EIA Report and associated EMPr will be circulated for commenting purposes.
Department of Environmental Affairs and Development Planning (DEADP) Directorate: Waste Management – Mr Muneeb Baderoon (Email: Muneeb.Baderoon@westerncape.gov.za; Tel.: (021) 483 2965):	The DSR briefly mentions waste removal and littering. Waste management, disposal and waste manifest documentation must be covered in detail for inclusion in the EMPr and must be strictly monitored during inspections and audits that are prescheduled in the EMPr.	Noted. The waste management approach will be covered in detail in the EMPr and Draft EIA Report.
	Audits of the proposed construction and operation phases must take place according to fixed schedules that are to be included in the EMPr.	This comment is noted and will be taken into consideration during the EIA phase of the process.
	The DSR indicates that large areas will be cleared of vegetation during site clearance. Vegetation clearing must be monitored by the environmental control officer. Alien vegetation and other removed vegetation may be taken to a green/garden waste chipping facility for composting or be disposed of at an appropriately licenced facility but may not be disposed of on adjacent land. The Municipality should be consulted for available options to deal with green waste as part of their Organic Waste Diversion Plan.	This comment is noted and will be taken into consideration in the EMPr during the EIA phase of the process.

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Department of Environmental Affairs and Development Planning (DEADP) Directorate: Air Quality Management – Mr Mzolisi Benxa (E-mail: Mzolisi.Benxa@westerncape.gov.za. Tel.: (021) 483 6510):	Noise generated on site from all the proposed activities must comply with the Western Cape Noise Control Regulations published in Provincial Notice 200/2013. Notice Noise Noise	A noise impact assessment has been undertaken for the project. Noise generated on site will comply with the Western Cape Noise Control Regulations published in Provincial Notice 200/2013 and all other relevant guidelines.
Tel.: (021) 403 0310).	 It is noted that the Environmental Noise Impact Assessment compiled by Enviro-Acoustic Research dated November 2022 indicated that the ambient sound level measurements for residual noise level is low and typical of a rural noise district (45 dBA for the daytime period and 35 dBA for the night-time period). 	Acknowledged. No further action is required.
	The noise specialist further indicated that the Western Cape Noise Control Regulations and the South African National Standards 10103 do not cater for instances when background noise levels change due to the impact of external forces, such as noise induced by higher wind speeds. The Environmental Noise Impact Assessment proposed to use a night-time noise limit of 42 dBA (periods with low or no winds), and an upper limit of 45 dBA (periods that wind turbines may operate), stating that the wind turbines will only operate during periods of higher wind speeds. This Directorate agrees with the noise specialist's assessment.	It is noted that this Directorate agrees with the noise specialist's assessment.

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	 The mitigation measures in section 10.4.1 of the Environmental Noise Impact Assessment should be included in the forthcoming EMPr. 	It is noted. The mitigation measures in Section 10.4.1 of the Environmental Noise Impact Assessment will be included in the EMPr during the EIA phase of the project.
	Furthermore, the special conditions in section 10.4.2 of the Environmental Noise Impact Assessment should be considered for inclusion in the proposed "conditions for approval" of the forthcoming Draft EIA Report.	It is noted. The special conditions will be considered for inclusion in the EA based on the assessment of the final layout.
	The Department reserves the right to revise initial comments and request further information based on any or new information received.	It is acknowledged. No further action is required.
20 January2023 Endangered Wildlife Trust Dr lan Little	Response to the Proposed HEUWELTJIES AND KRAALTJIES WIND ENERGY FACILITIES AND ASSOCIATED INFRASTRUCTURE, NEAR BEAUFORT WEST, WESTERN CAPE PROVINCE DFFE reference number	Acknowledged, no further action is required.
	The Endangered Wildlife Trust (EWT) is a non-governmental, non-profit, conservation organisation, founded in 1973 and operating throughout southern Africa. The EWT conserves threatened species and ecosystems in southern Africa by implementing research and conservation action towards mitigating threats facing species diversity and supporting	

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	Environmental authorisation in terms of the Environmental Impact Assessment (EIA)	

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	Regulations 2014, as amended, to screen their proposed site for any environmental sensitivity. Based on the proposed footprint of Heuweltjies and Kraaltjies wind energy facilities and associated infrastructure, a number of species have been highlighted as potentially occurring in the proposed development area, these include Verreaux's Eagle, martial Eagle and Ludwigs Bustard.	
	 In evaluating the above application, we wish to highlight the following impacts and resultant recommendations: It is critical that no human disturbance associated with any construction activity occurs within these buffers near active breeding eagle nests in the peak breeding period between May and September, i.e. construction vehicles, labourers on foot, etc. All other human disturbance should also be minimized or avoided during this breeding period. 	This comment is noted and will be taken into consideration in the EMPr during the EIA phase of the process.
	Although the power line design will minimise bird electrocution incidents due to satisfactory phase clearances, collisions with shield wires or conductors are still likely to occur. With regards to the transmission lines fitting Bird Flight Diverters (BFDs) may mitigate collisions involving large raptors but it will not mitigate (at all) collisions by	It is noted. Powerlines to be handed over to Eskom will be constructed to specification as determined by Eskom and fitted with approved BFDs at the Eskom-recommended intervals.

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	Ludwig's Bustard. Due to the fact that lines are	
	likely to be handed over to Eskom (for long term	
	management as per standard power purchase	
	agreements), they need to be constructed to	
	specification as determined by Eskom and fitted	
	with approved BDFs at the Eskom recommended	
	intervals.	
	New power lines need to be placed, as far as	This comment is noted and will be taken into
	possible, in areas where linear infrastructure	consideration when designing the layout in the EIA
	already exists and ideally as close to the existing	phase of the project.
	lines as possible.	

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	 Avifaunal Impacts: Arguably, six large, globally and/or regionally threatened, impact sensitive species are potentially the most heavily affected by wind farming and are likely to account for much of the bird impact profile of any given proposed WEF. Of these, the three large eagle species - Verreaux's Eagle Aquila verreauxii, Martial Eagle Polemaetus bellicosus, and Crowned Eagle Stephanoeatus coronatus, one vulture species, the Cape Vulture Gyps coprotheres, one Harrier species, the Black Harrier Circus and also the Secretarybird and Ludwigs Bustard. The latter is impacted more by associated powerline infrastructure than the turbines themselves. We highly recommend a shut down on demand system is implemented, either through on the ground observers, or automated systems, to shut down turbines when collision prone birds enter wind farms and are heading within rotor sweep zones. These species include, but are not limited to Martial Eagles, Verreaux's Eagles and Ludwig's Bustards. These species are known to occur within the region. This has been highly effective on Excelsior Wind Farm in the Western Cape. 	The recommendation for shut down on demand is noted, which includes for the following species, but are not limited to Martial Eagles, Verreaux's Eagles and Ludwig's Bustards. The avifaunal specialist will be engaged to obtain specialist opinion on this matter and the relevance and applicability of this measure for the proposed wind farm. This will be addressed in the avifaunal impact phase specialist report accordingly.

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	Should new, more effective BDFs come available the developer needs to be ready to procure and fit these. The EWT is in the process of expanding its current long-term line marking experiment near De Aar where a further 4 BFD designs will be tested, specifically to reduce Ludwig's Bustard collisions. If this development proceeds, we urge the developer to contact the EWT Wildlife and Energy programme directly and to participate in this important and ongoing research. In the event that a more effective BFD is identified and approved, this must be applied to the line. Possibly including the replacement of old BFDs where possible.	This comment is noted. If need be the developer will contact EWT Wildlife.
	Lines need to be seasonally monitored (according to the ESKOM/EWT partnership protocol) for fatalities and these fatalities should be reported to the Eskom/EWT Strategic partnership.	It is noted that where overhead powerlines are constructed that monitoring should take place seasonally and that these fatalities should be reports to the Eskom/EWT Strategic Partnership. This will be undertaken accordingly where applicable to overhead lines and included in the EMPr accordingly.
	While the turbine design has not yet been finalised, we recommend that minimum blade tip height be set as high as is possible (even more than the 25 m recommended).	This comment is noted. The applicant will take this into consideration in the design of the layout.
	 Verreaux's Eagle Collision Risk: For Verreaux's Eagles, space use is dependent on not only the distance from an individual eagle's 	Please note that no Verreaux's Eagle (VE) nests were identified within proximity of the site, therefore the implementation of VE buffers are not relevant nor

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	nest site, but also the local density or distribution of conspecific nest sites, the topographic slope and the elevation. In line with BLSA (2017) absolute minimum guidance. BLSA (2017) in fact recommends 3 km buffers, and these have since been updated to 5.2 km buffers or VERA modelling (Ralston-Paton & Murgatroyd, 2021), although these buffers are briefly discussed they are not implemented.	applicable. As such, these have not been implemented accordingly.
	The Verreaux's Eagle Risk Assessment (VERA) tool has been developed to reduce Verreaux's Eagle collisions on wind farms. VERA modelling represents the latest available methods for the assessment of wind turbine collision risk potential for Verreaux's Eagles. It has been widely accepted as the primary tool in assessing the spatial distribution of collision risk for this species and has been adopted into the most recent version of Birdlife South Africa's Verreaux's Eagles and Wind Farm guidelines for impact assessments (Ralston-Paton & Murgatroyd, 2021). Although the publication of the guidelines only occurred in 2021, VERA modelling has been available in some format since 2018. The first publication on the modelling methods it was made available in January 2021 (Murgatroyd, Bouten, & Amar, 2021), and since then VERA has been applied to 15 wind energy developments.	Acknowledged, no further action is required.

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name of organisation / I&AP	VERA uses the locations of Verreaux's Eagle nests and the topography of the site to determine collision risk. The risk is classified into three levels: high, medium and low. It is recommended that as a minimum requirement no turbines should be built within high-risk locations. Furthermore, for optimal conservation, medium risk locations should also be avoided by developments, however with additional site-specific specialist input or mitigation methods a limited amount of development in these areas may be permissible (Murgatroyd et al., 2021). These recommendations have since be expanded on in the updated guidelines following the same approach (Ralston-Paton & Murgatroyd, 2021). VERA predicts collision risk for Verreaux's eagles on a 90 x 90m grid square resolution and it is the best tool available for understanding the likely impacts of wind energy development pre-construction. In comparison to circular buffers, it has been used to correctly predict 11 of the 14 collisions which have occurred. Thus, we recommend that this tool is applied to the development site to determine turbine layout in a way which minimises risk to this species rather than any circular buffers. This demonstrates a 3 km circular nest buffer to be inadequate and that a dynamic 5.2 km buffer is	A Martial Eagle nest was the only identified Eagle nest within proximity to the site and was buffered accordingly using a circular buffer which is considered appropriate for this species, as recommended and applied in the avifaunal specialist scoping report. Please note that Verreaux's Eagle was only identified as a species that could potentially occur in the broader area. In addition, this species was noted as having a Low likelihood of regular occurrence at the site. No specific sightings were made of the species, nor were any nests identified. As such, the applicability of the VERA model is not deemed appropriate as no known nests occur in proximity to the wind farm.

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	more realistically required to reduce fatalities. We also know that raptor space use around a nest site is not even or circular.	
	The EWT will make the VERA tool available to recalculate buffers and adjust design if required.	Please see the response above.
	 Martial Eagle Collision Risk: Martial Eagle is notoriously wide-ranging, with internest distances in the central Karoo averaging about 15 km (Boshoff 1993, Machange et al. 2005), and nearest neighbour distances in the Cookhouse area apparently averaging about 19 km. Although such extreme social spacing suggests the need to apply buffers of 8-12 km, recent GPS tracking-based data from breeding adults in the Karoo (G. Tate, pers. comm.) suggest a generic buffer distance of 6 km is probably sufficient, based on the core habitat used by the species derived our tracking data of 19 Martial Eagles across the central and eastern Karoo. 	The avifaunal specialist will be engaged to obtain specialist opinion on this matter and the relevance and applicability of this measure for the proposed wind farm. This will be addressed in the avifaunal impact phase specialist report accordingly.
	Bat collision risk: Bats are particularly susceptible to anthropogenic changes because of their low reproductive rate, longevity, and high metabolic rates, limiting their ability to recover from declines and to maintain sustainable populations. Bat fatalities due to wind	Acknowledged, no further action is required.

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	General recommendations: • We further recommend a comprehensive, long-term avifaunal and terrestrial monitoring programme be implemented by an independent qualified service provider (see guidelines in appendix 1). Little is known about terrestrial impacts of large wind developments and as such this project, if approved, will provide an opportunity to measure baselines and changes over time for terrestrial species.	The avifaunal and terrestrial specialist will be engaged to obtain specialist opinion on this matter and the relevance and applicability of this measure for the proposed wind farm. This will be addressed in the avifaunal impact phase specialist report accordingly.
	Avifaunal impacts need to be closely monitored with seasonal line surveys and surveys in the vicinity of turbines.	Acknowledged. Monitoring of powerlines will be undertaken accordingly for overhead powerlines (where constructed). In addition, monitoring surveys in the vicinity of turbines will be undertaken in accordance with the latest operation monitoring best practice guidelines and carcass searching requirements for avifauna.
	The developments will constitute an additional pressure on biodiversity in the area. This runs against the purpose of the conservancies and formal protected areas in the region, that have taken many years of conservation investment to get off the ground. Therefore, the EWT would like to see a commitment to conservation from the developer. A variety of options are available, and	This is acknowledged and welcomed. The Developer will contact EWT to explore the variety of options available to gain more insight.

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	the developer is welcome to contact the EWT to discuss these. • Significant adverse impacts can be expected during the construction phase including vehicular collisions with wildlife, collection and cutting of shrubs for firewood, potential snaring, pollution, etc., and as such strict controls and protocols are required during this phase.	Acknowledged, strict controls and protocols as per the EMPr will be implemented during the construction phase.
	We strongly advise the appointment of an independent consultant to monitor activities during the construction phase and to report issues and non-compliance to the authorities and developer.	An independent consultant will be appointed to monitor activities as part of the Environmental Control Officer duties during the construction phase.
	There is seldom evidence of sufficiently robust implementation of the mitigation hierarchy in the process of site selection. Avoidance, which is the first and most important step, must be duly considered as the first priority.	Acknowledged, the mitigation hierarchy will be considered starting from avoidance.
	The EWT appreciates the opportunity provided by the developer to comment and we look forward to the opportunity to participate in the process of informing the responsible placement of turbines or alternatively avoidance if no environmentally responsible options are_available. We would value the opportunity to provide our detailed landscape planning data and to assist through	Acknowledged. The EIA Report with detailed layout will be subjected to a 30-day review to all interested and affected parties for commenting purposes.

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	negotiation to inform decision making, but we cannot support high-risk options. • We further request that the relevant competent authority and Department of Forestry, Fisheries, and the Environment (DFFE) need to take these concerns into consideration, including the associated powerlines and other infrastructure that will be required as a result of the proposed wind energy development. • The EWT reserves the right to revise initial	Acknowledged. All comments received from I&APs and organs of state during the review and comment period of the SR have been included within this C&RR to be submitted to the Competent Authority with the final SR. Acknowledged, no further action is required.
	comments presented here, if additional information becomes available.	
23 March 2023	ACCEPTANCE OF THE SCOPING REPORT FOR	
Director: Integrated Environmental	THE PROPOSED HEUWELTJIES WIND ENERGY	
Authorisations	FACILITY (WEF) AND ITS ASSOCIATED	
Department of Forestry, Fisheries and	INFRASTRUCTURE NEAR BEAUFORT WEST IN	
the Environment (DFFE) Ms Trisha Pillay	THE PRINCE ALBERT LOCAL MUNICIPALITY, CENTRAL KAROO DISTRICT MUNICIPALITY IN	
INIS ITISTIA FIIIAY	THE WESTERN CAPE PROVINCE	
	(a) Specific Comments	This has been addressed in the updated Terrestrial Biodiversity Assessment Report. Neither species
	(i) According to the Biodiversity Assessment (Appendix 6J) the Critically Endangered Riverine Rabbit (<i>Bunolagus monticularis</i>) occurs on site and the Endangered reptile <i>Cherobius boulengeri</i> ("Dwarf" Karoo Padloper) occurs in close proximity to the site. The distribution range of the Riverine Rabbit and the	have been confirmed on site. However, the precautionary approach has been applied as their habitat and food has been identified on site. Mitigation measures include limiting night travel and implementing speed control.

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	Dwarf Karoo Padloper that are present on site should be illustrated in the EIAr, as well as the recommended buffers that should be applied in order to protect the sensitive species.	
	(ii) In the Terrestrial Biodiversity Assessment mammal species were sampled by "Camera traps which were deployed for the maximum possible time with important or strategic habitat, thus any images collected will form part of the EIA phase of the assessment". It is therefore assumed that the Terrestrial Biodiversity Assessment will be updated during the EIAr phase and will include the results of camera trap monitoring, which will inform if additional management measures for the protection of the Riverine Rabbit are required.	The updated Terrestrial Biodiversity Assessment Report does include the results of the monitoring. None of the camera traps employed produced evidence of this species being present, possibly due to the wet conditions during the 4 weeks that the cameras were deployed, but it can be assumed that these will be present due to past confirmation in the region and the availability of habitat on the site. The mitigations specified in the impact section include vehicle movement - sticking to designated and prepared roads and adhere to the speed limit on site of 40km/hr.
	(iii) In the Terrestrial Biodiversity Assessment herpetofauna species were sampled by "Installation of pitfall traps and two drift fence arrays. Data collected from these will also be included in the EIA phase." It is therefore assumed that the Terrestrial Biodiversity Assessment will be updated during the EIAr phase and will include the results of this sampling technique, which will inform if additional management measures for the protection of the Dwarf Karoo Padloper are required.	Due to the heavy rainfall experienced during the second survey period, the pitfall traps were not successful in capturing any species as these traps filled with silt and or water. However, the camera traps did capture images of polecat and bat eared fox. The mitigations specified in the impact section include vehicle movement - sticking to designated and prepared roads and adhere to the speed limit on site of 40km/hr.
	(iv) The specialist that conducted the Terrestrial Biodiversity Assessment stipulates "several sensitive species were observed within the site, which included both plants and reptiles, the former being found throughout the site, while	The core habitat areas have been mapped.

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	the latter are highly mobile, thus core sensitive areas could not be mapped as these species are thus encountered throughout the site. Thus, once the layout for roads, hardstands and buildings has been refined a micrositing walkdown must be conducted to ensure that any populations of these sensitive species are avoided. Due care must be carried out during construction period with respect the presence of listed reptiles and an ECO/EO must be present on a daily basis to remove any reptiles such as the Karoo Padloper." The interpretation of the above statement is that the specialist cannot map the distribution range of the sensitive species due to the mobility of the species on the entire site. Please provide clarity as to why the core sensitive areas of the site cannot be mapped as the reason provided that the sensitive species occurs throughout the site is not a valid reason. If the identification of the core sensitive areas is based on the presence of the sensitive species on the site, then it should be reflected as such on the maps. It is imperative that sensitive areas are mapped, and all no-go areas are identified in order to inform the layout plan.	The habitat is so uniformed and spans for thousands of kilometres, that identifying core critical habitat is not possible. The species could more throughout the area but making the entire area as a no-go area does not make sense. The padloper lives in crevices which were not noted on site. However, the precautionary approach has been applied in the mitigation measures proposed.
	(v) The layout plan submitted in the final SR only reflects the turbine buildable area, the substation, and the alternative substation. The layout plan submitted in the EIAr must reflect all turbine positions (turbines to be numbered), substations, BESS, roads and all associated infrastructure.	The layout plan submitted in this EIAr phase reflects numbered turbine positions, Substations, BESS, Construction laydown and O&M Building areas. Refer to Figure 66 for the layout plan.
	(vi) Kindly take note the proposed Substation Site Option 2 illustrated on the Layout Plan dated 29 November 2022 encroaches within highly sensitive areas classified as a	The substation site option 2 has been relocated from highly sensitive areas (CBA1). Refer to Figure 66 for the layout which shows the new substation locations.

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name of organisation, fact.	CBA1 and should be relocated to avoid these sensitive areas.	
	(vii) The updated layout plan reflecting all proposed infrastructure must be used in all specialist studies submitted in the EIAr. Please take note that the sensitivities identified by the specialist studies and comments made by I&APs must be used to inform the layout plan.	The updated detailed layout plan reflecting all proposed infrastructures has been used in all specialist studies. The identified sensitivities and recommendations by specialist have been considered in the layout plan.
	(b) Listed Activities	
	(i) The EIAr must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.	The EIAR provide an assessment of the impacts and mitigation measures for each of the listed activities applied for. Refer to Section 14.1.3
	(ii) The listed activities represented in the EIAr, and the application form must be the same and correct.	The Activities represented in the EIAr do not differ from those in the application form. The listed activities are the same and correct. Refer to Table 9 of the EIAr.
	(iii) The EIAr must assess the correct sub listed activity for each listed activity applied for.	The EIAr assessed the correct sub-listed activity for each listed activity applied for, as per the application form.
	(c) Public Participation (i) Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAr. This includes but is not limited to the Western Cape Department of Environmental Affairs and Development	All comments received from all relevant stakeholders are submitted to the Department with the EIAR. Refer to Appendix 5 of the EIAr.

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	Planning (DEA&DP), the Prince Albert Local Municipality, the Central Karoo District Municipality, the Department of Water and Sanitation (DWS), the South African Heritage Resources Agency (SAHRA), Heritage Western Cape, the Endangered Wildlife Trust, BirdLife SA, the South African Bat Assessment Association (SABAA), Cape Nature, the Department of Mineral Resources and Energy, the Department of Forestry, Fisheries and the Environment: Directorate Biodiversity and Conservation.	
	(ii) Please ensure that all issues raised, and comments received during the circulation of the draft SR and draft EIAr from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final EIAr.	All comments received during the circulation of the draft SR are included in the C&RR (included as Appendix 5 of the EIAr) and have been adequately responded to. Comments that will be received during the circulation of the Draft EIAr will be responded to adequately and included in the C&RR and submitted together with the Final EIAr
	Proof of correspondence with the various stakeholders must be included in the final EIAr. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.	Proof of correspondence with the various stakeholders and proof of attempts to obtain comments from the stakeholders on the project database are included in Appendix 5 of the EIAr.
	(iii) A Comments and Response trail report (C&R) must be submitted with the final EIAr. The C&R report must incorporate all comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Annexure 1 of this comments letter. Please refrain from summarising comments made by	The C&RR is attached as a separate document in Appendix 5 of the EIAr. Written comments received have been captured verbatim and not summarized and responded to as applicable. Following the review and comment period of the EIAr, all written responses received will be included in the C&RR to be appended to the final EIAr for submission to DFFE.
	I&APs. All comments from I&APs must be copied verbatim and responded to clearly.	

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	Please note that a response such as "noted" is not regarded as an adequate response to I&AP's comments.	It is noted that the response such as noted is not regarded as an adequate response. The EAP has refrained from using such response.
	(iv) Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.	Comments received have been captured by date order in the C&RR and have been responded to individually. Refer to Appendix 5 of the EIAr.
	(v) The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 and 44 of the EIA Regulations, 2014, as amended.	The Public Participation Process was conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended (GNR 326).
	(d) Layout & Sensitivity Maps (i) The EIAr must provide coordinate points for the proposed development site and all proposed infrastructure (note that if the site has numerous bend points, at each bend point coordinates must be provided) as well as the start, middle and end point of all linear activities.	Refer to Section 5 for the coordinate points for the proposed development site and all proposed infrastructure.
	(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.	All preferred turbine positions are clearly numbered and have been used in maps that are included in the report.
	(iii) The EIAr must provide a copy of the final preferred layout map. All available biodiversity information must be used in the finalisation of the layout map. Existing	The EIAr provides a copy of the final preferred layout map with all identified sensitivities. All proposed infrastructures are clearly indicated. Refer to Figure 67

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	infrastructure must be used as far as possible e.g., roads. The layout map must indicate the following: a) A clear indication of the envisioned area for the proposed wind energy facility; b) Position of the wind turbines; c) Internal roads; d) All supporting onsite infrastructure such as laydown area, guard house and control room etc.; e) Substations, transformers, switching stations and inverters; f) Battery Energy Storage System; g) The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected by the facilities and its associated infrastructure; h) Connection routes (including pylon positions) to the distribution/transmission network; i) All existing infrastructure on the site, especially railway lines and roads; and j) Buildings, including accommodation.	
	(iv) Please provide an environmental sensitivity map which indicates the following: a) The location of sensitive environmental features identified on site, e.g. CBAs, protected areas, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure; b) Buffer areas; and c) All "no-go" areas.	Refer to Figure 64 for the sensitivity map.

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	(v) The above layout map must be superimposed (overlain) with the sensitivity map and a cumulative map which shows neighbouring and existing infrastructure.	Refer to Figure 66 for a layout map superimposed with the sensitivity map and refer to Figure 65 for a cumulative map which shows identified renewable projects within 35km of the Heuweltjies WEF.
	(vi) Google maps will not be accepted.	It is noted that Google Maps will not be accepted. The EAP has refrained from using such maps.
	(e) Specialist assessments	
	 (i) The EAP must ensure that the terms of reference for all the identified specialist studies must include the following: a) A detailed description of the study's methodology; indication of the locations and descriptions of the development footprint, and all other associated infrastructures that they have assessed and are recommending for authorisation. 	The identified and recommended specialist studies include a detailed description of the methodology followed as well as an indication of the location and description of the development and all other associated infrastructure.
	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.	The specialist studies provide a detailed description of the limitations of the studies. All specialist studies included have been conducted in the right seasons.
	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.	The Department's definition of 'no go' areas is noted. This is the same approach is taken by the EAP and specialists.
	d) Should the specialist definition of 'no-go' area differ from the Department's definition; this must be clearly indicated.	The specialist's definition of 'no go' areas does not differ from that of the Department. Please note all no-go zones

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	The specialist must also indicate the 'no-go' area's buffer if applicable.	and buffers as determined by specialists are clearly indicated. Refer to Figure 66 for the sensitivity layout.	
	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.	All specialists' studies are final for and provide detailed/practical mitigation measures and recommendations. However,, the terrestrial and aquatic specialists have recommended a pre-construction walkthrough to assist in the final layout design.	
	f) Bird and bat specialist studies must have support from Birdlife South Africa and SABAA.	The Bat and Birds specialist studies were conducted in accordance with the Birdlife South Africa and SABAA guidelines. Furthermore, SABAA and Birdlife South Africa have been included in the database for commenting purposes.	
	g) Should a specialist recommend specific mitigation measures, these must be clearly indicated.	Specific measures as provided by the specialists have been clearly indicated. Refer to Section 14.1.3	
	(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.	Where specialists recommended contradicting recommendations, the No contradicting recommendations were provided by the specialists as part of the EIA Phase.	
	(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	Where required the specialists' studies have been conducted in accordance with Government Notice No. 320 of 20 March 2020 (i.e. "the protocols"), and the Government Notice No. 1150 of 30 October 2020.	

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	come into effect. Please note that specialist assessments must be conducted in accordance with these protocols.	
	(iv) Please also ensure that the EIAr includes the Site Verification Report and Compliance Statements (where applicable) as required by the relevant themes.	Where required, site verification reports have been compiled by the specialists. Refer to Appendix 6
	(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.	The relevant specialists' certificates have been attached to the specialists' reports. Refer to Appendix 6
	(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.	Signed and commissioned specialists' declarations including scientific organisation registration number and status of registration, are contained in Appendix 6 of the EIAr.
	 (vii) The following Specialist Assessments will form part of the EIAr: Geotechnical Assessment Social Impact Assessment Transport Assessment Visual Assessment Avifaunal Assessment Bat Assessment Agricultural Assessment Surface Water Assessment Heritage Assessment (Including Archaeology, Cultural Landscape and Palaeontology) Noise Assessment; and 	The following specialists have been undertaken as part of the EIAr: Transport Assessment Visual Assessment Avifaunal Assessment Bat Assessment Agricultural Assessment Surface Water Assessment Heritage Assessment (Including Archaeology, Cultural Landscape and Palaeontology) Noise Assessment; and Biodiversity Assessment

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	Biodiversity Assessment	Please note that for the Geotechnical and Social specialist's desktop assessments that were undertaken during the scoping phase have been used to compile the EIAr.
	(f) Cumulative Assessment (i) There are several WEFs within a 35km radius of the proposed Heuweltjies WEF. The wake effect should be investigated as the surrounding WEFs may impact on the energy production of the proposed Heuweltjies WEF and the Heuweltjies WEF may impact on the energy production of the surrounding WEFs. Investigating the potential impacts of the wake effect are imperative to ensure the efficiency and effectiveness of WEF's.	Several WEFs within the 35km radius have been considered in the EIAr. A wake effect study has been undertaken for the project. Refer to Appendix 6
	 (ii) A cumulative impact assessment for all identified and assessed impacts must be conducted to indicate the following: a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land. b) Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in 	Acknowledged. Cumulative impacts have been assessed (Refer to Section 14.3.1) of the DEIAr. Renewable energy developments within 35km radius of the proposed development have been identified as detailed in Section 14.3.1. The wake effect study which takes into consideration the surrounding wind farms has been undertaken. Refer to Appendix 6 for the wake effect study.

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	the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project. c) The cumulative impacts significance rating must also inform the need and desirability of the proposed development. d) A cumulative impact environmental statement on whether the proposed development must proceed.		
	(g) General (i) The EIAr must provide the technical details for the proposed facility in a table format as well as their description and/or dimensions. A sample for the minimum information required is listed under Annexure 2 below.	Refer to Table 8 of the DEIAr for a table indicating technical details of the project.	
	(ii) The EAP must provide landowner consent for all farm portions affected by the proposed project i.e., all farm portions where the access road, wind turbines and associated infrastructure are to be located.	All landowners consent were appended and submitted together with the application form as Appendix 3 .	
	(iii) A construction and operational phase EMPr that includes mitigation and monitoring measures must be submitted with the final EIAr, including the Generic EMPr for substations.	Refer to Appendix 9 for a facility EMPr and Generic Substation EMPr.	
	The applicant is hereby reminded to comply with the requirements of Regulation 45 of GN R982 of 04 December 2014, as amendment, with regard to the time period allowed for complying with the requirements of the Regulations.	Acknowledge. The FEIAr will comply with the time period allowed for complying with the requirements of the Regulation.	

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	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.	commence prior to receipt of the Environmental

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SiVEST SA (Pty) Ltd **Environmental Division**

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25 August 2023

Heuweltjies and Kraaltjies WEF projects: Heritage questionnaire for public participation process.

Please note:

- 1 All adult residents living on the properties should be interviewed (land owners, farm managers and non-landowning residents). This must not be limited to employees of the land owners or managers, but all adults in each household.
- 2 Questions should be presented to people in their mother tongue.
- 3 Questions should be shared with people by someone they trust, who doesn't serve to gain from the approval of the development in question and is not their employer.
- 4 Respondents should be given a fair amount of time to respond.
- These questions must be shared in a way that guarantees accessibility by all respondents and takes cognisance of unequal access to literacy, facilities and technology – church and other community events and platforms are recommended; emails are not acceptable unless confirmed as such by the respondent.
- 6 If respondent cannot read, this questionnaire must be shared verbally and answers recorded.
- The responses should be shared with the heritage specialist for review and summary before final inclusion into the EIA as EMPr conditions may result.

Questions:

- 1) How long have you lived here?
- 2) Do you own this house/ place?
 - a. If no, who owns it?
 - b. Who maintains the house?
- 3) What work do you do?
- 4) Do you have any other skills or crafts you could use to make a living?
- 5) Do you have any family living with you or nearby?
 - a. If yes: Who? Where? How long have your family lived here?
 - b. Where did you and/ or your family live before?
- 6) Do you grow any food for yourself or have any livestock?
 - a. If yes, do you depend on this for survival?
 - b. Where do you grow your food/ keep the livestock?
- 7) Do you use any of the indigenous plants or other things in the area for personal use, such as medicine or food?
 - a. If yes, can you describe it, what it is used for and where it can be found?
- 8) Are there any places around here that are important or special to you or your family?
 - a. If yes, please describe and identify the place.

- 9) Do you have any friends or family buried here or nearby?
 - a. If yes, please identify the place.
- 10) Do you use the roads to travel or are there footpaths as well that link the different places?
 - a. If yes, please identify any footpaths.
- 11) Do you know of any really old places nearby or in the area?
 - a. If yes, please identify and describe.
- 12) Do you know about/ have you seen a wind energy facility/ wind farm?
- 13) Have you been told anything about wind farms/ wind energy facilities?
 - a. If yes: What have you been told about them?
- 14) What do you think/ feel about them in general?
- 15) Do you know that there is a wind farm being planned for this/ nearby farm? (Explain where the WEFs are proposed for in relation to the respondent.)
- 16) Do you know about the different parts of a wind farm, i.e. roads, turbines and laydown areas?
 - a. If no, describe these aspects to the respondent (including turbine height and sound, road width, etc.).
- 17) Has the process of the development been described to you?
 - a. If no, describe the process of phased development and the impacts (traffic/ noise/ etc.) to the respondent.
- 18) Do you know how long the wind farm will be here for?
 - a. If no, explain to respondent.
- 19) Do you know how many wind farms have been proposed and approved for the area?
 - a. If no, describe all approved WEFs in 35km radius to the respondent.
- 20) Do you have a choice whether to stay or go if the wind farm is built?
- 21) How will the wind farm influence your life and family?
- 22) Do you support the building of a wind farm here?
 - a. If yes/ no, please explain why.
- 23) Do you have any further questions about the wind farm or its influence on your life?
 - a. If the interviewer can answer the question, please do, otherwise please take any questions and contact details of the respondent in order to respond if possible in the future.



HS Sentraal sporttoekennings 2022



Huis BARNARD wen die jaar! Die kapteine was Inge en Wade Nel.



Rugby: Beste voorspeler: Anam Lamani, beste o.15 speler: Jevahn Klaaste, beste voorspeler: Teddy Dladlu, beste agterspeler: Sipho Sokweba, eerstespanspeler met die beste prestasie in rugby en akademie: Arno Barnard, rugbyspeler van die jaar: Arno Barnard.



Eerstespanspeelster met die beste prestasie in netbal en akademie: Anche Matthee; verdienstelikheid en netbalspeelster van die jaar: Inge Nel; veelsydigste netbalspeelster: Paula-Mari Abraham.



Netbal: Beste junior doel: Lynne Cilliers; beste o.16 spelers: Geo Meyer en **Anelisa Hans**

WAYS TO SAVE ENERGY







WIND POWER

SOLAR ENERGY

WAVE POWER







BIOFUEL

BIOGAS STOVE

ELECTRIC CAR

Hierdie week se slagpryse

Karoo Lam se aankooppryse per kg karkasgewig aan die boer vir Dorper (Merino varieer na gelang van die wollengte van die vel):

Week: 12 - 15 Desember 2022

Lam: A2, 3 R87.00 Skaap: B2, 3 R65.00 A4 R74.00 **B**4 R52.00 Jong skaap: AB2, 3 R72.00 Ou skaap: C2, 3 R63.00 AB4 R59.00 C4 R50.00

Bogenoemde pryse is BTW uitgesluit. Die vyfde kwart (vel en afval) is ingesluit by die prys.

SIVEST ental Division SIVEST

NOTICE OF THE ENVIRONMENTAL IMPACT ASSESSMENTS (EIAs) FOR THE PROPOSED HEUWELTJIES AND KRAALTJIES WIND ENERGY FACILITIES AND ASSOCIATED INFRASTRUCTURE, NEAR BEAUFORT WEST, WESTERN CAPE PROVINCE

In terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) as amended and the Environmental Impact Assessment (EIA) Regulations, under Government Notices No R982, R983, R984 and R985 promulgated on 4 December 2014 (as amended), notice is hereby given that South Africa Mainstream Renewable Power Developments (Pty) Ltd (hereafter referred to as "Mainstream"), has appointed SiVEST SA (Pty) Ltd, as the independent Environmental Assessment Practitioner (EAP), to undertake the required Environmental Impact Assessment (EIA) and Public Participation Processes (PPP) for the above-mentioned developments. The competent authority for the required EIA Processes is the National Department of Forestry, Fisheries and the Environment

PROJECT DESCRIPTION
WEF: The proposed Heuweltjies and Kraaltjies WEFs will comprise of up to 60 wind turbines each. Each WEF will have a maximum export capacity of approximately 240MW. Each proposed WEF will also consist of a 11-33/132kV on-site substation and Battery Energy Storage Systems (BESS), located next to the proposed on-site substations.

The overall objective of the development is to generate electricity by means of renewable energy technology capturing wind energy to feed into the National Grid.

The proposed Heuweltjies WEF and associated infrastructure is located approximately 70km south of Beaufort West in the Western Cape Province and the proposed Kraaltjies WEF and associated infrastructure is located approximately 52km south of Beaufort West in the Western Cape Province. The proposed WEFs are located within the Beaufort West and Prince Albert Local Municipalities (respectively), in the Central Karoo District Municipality on the following properties:

Heuweltjies	WEF

The application site is approximately 4017.6 hectares (ha) in extent and incorporates the following farm portions:

The application site is approximately 3960.29 hectares (ha) in extent and incorporates the following farm portions:

- Remainder of the Farm Witpoortje No 16
- Portion 8 of The Farm Klipgat No 114
- Portion 10 of the Farm Brits Eigendom No 374 Portion 25 of the Farm Brits Eigendom No 374

To register as an Interested and / or Affected Party (I&AP) and / or to obtain additional information please submit your name, contact details (telephone number, postal address and email address) and the interest which you have in the application to SiVEST as per the details below and please reference 'Heuweltjies WEF', 'Kraaltjies WEF', in your correspondence:

SIVEST Environmental Division:

Contact: Hlengiwe Ntuli

Tel: (011) 798 0600 P O Box 2921

Fax: (011) 803 7272 Rivonia 2128

E-mail: sivest_ppp@sivest.com Website: www.sivest.com

copy of the draft Scoping Reports (SR) can be obtained on the SiVEST website at: http://www.sivest.com/za/Download, or at the Beaufort West Library (15 Church Street, Beaufort West, Western Cape) and at the Prince Albert Public Library (27 Church Street, Prince Albert, Western Cape) or emailed on request, The comment period for the draft SR report will run from 14 December 2022 until 05 February 2023. I.T.O POPIA, you hereby declare and confirm that you, as an I&AP providing information, consent for your information to be gathered, stored and distributed for the purpose of this project.





Die Courier

het die Beaufort-Wes Munisipaliteit Transnet se krag in Beaufort-Wes afgesny weens wanbetaling van diensterekening!

Klereskenking: Het jy dalk enige ou of onbenutte klere? Gee dit gerus by een van ons plaaslike Rotariërs af. Kinder, mans en vroueklere is baie welkom skoene ook! Rotary ServiceAboveSelf

St. Matthews Church Golf Day – 9 September 2023 from 08:30. Beaufort West Gholf Club. Registration R350 (American Electric: 023 415 2276 Scramble). Breakfast, lunch & supper served. Many prized to be won – T-shirt and cap for first 30 registrations. There will also be a wet hole. Registration closes on Friday 8 September 2023.

SA National Parks Week: Free day visitor entry at the Karoo National Park 16 – 24 September 2023

Merweville Lam-en Olyffees – 22 −25 September 2023

Laingsburg Karoo Ultra Marathon (56 km) op 30 September 2023 om 06:00. Aangebied deur die Arlington Atletiekklub en geborg deur Wes-Kaap Regering.

Franna Benade tree op in Niko Brummer Primêr skoolsaal op 17

Op Woensdag 23 Augustus 2023 Oktober 2023 om 18:30 Volwasenes R90 en Skoliere R70. Kaartjies te koop by die skool. Snoepie beskikbaar met lekkernye, koeldrank en "toasted ham & cheese" broodjies. Aangebied deur Niko Brummer Primêr.

Save the date: Loxton 10's en Loxton skou met Gerhard Steyn op 8 en 9 Desember 2023.

Beaufort West Municipality emergency numbers: Ambulance: 023 449 8000 Fire Brigade: 064 014 2860 SAPS: 023 414 8800 Water: 083 415 8300 Communications: 068 243 0835

Beaufort West Municipality: Community notice - A R2000 reward will be paid to anyone with information around the damaging of municipal property. The award will be given upon the successful conviction of the culprits.

SANParks Honorary Rangers present: Big Birding Bash in the Karoo National Park - October 2023. Join our Karoo "Big Birding Bash" as we search for exciting endemics, unusual LBJs and spectacular raptors in the Karoo National Park. This park is a haven for endemics and should be on every birder's bucket list. So, bring along your camera and your binoculars for exciting and unusual

50 jaar gelede

Op Vrydag 31 Augustus 1973 word daar as volg in Die Courier berig:

Die mynmaatskappy Ruighoek Chrome Mines wie se opsie op die plaas Rietkuil vandag sou verstryk het gister hulle opsie uitgeoefen en die plaas derhalwe gekoop vir R277 000. Dit kom neer op R45 per morg. Dieselfde maatskappy het etlike dae gelede 'n anbod vir 'n deel van die plaas gemaak, maar mnr. Bekker Smith, die eienaar van die plaas het die aanbod geweier. Die Courier het intussen die mening ingewin van verskeie sakeen boereleiers oor die Rietkuil transaksie. Mnr. J.D. Malan, voorsitter van die Afrikaanse

birding and photographic opportunities, all for a good cause. Funds raised will go towards conserving this special birding destination. As an added bonus, enter our photographic competition and stand a chance to win big prizes. Date: 13 – 15 October 2023. Cost R950 per person (Includes birding activities, talks, prizes and prize-giving dinner. Accommodation is for own arrangement) Contact: Japie Claassen karoobirding@beaufortwest.net



083 724 7916.

Sakekamer, sê dat die huidige verwikkelinge verblydend is, maar mense moet hulle nie laat mislei deur ongegronde berigte nie. Mnr. Bennie van der Merwe, bekende boer en voorsitter van die Afdelingsraad, sê boere moet deskundige advies inwin en seker maar van hul mineraleregte. Nog 'n plaaslike boek, mnr. Toks Pienaar, voorsitter van die Sentrale Bestuur van Boereverenigings, sê grondeienaars moet versigtig wees en pas op nou vir vingers verbrand!

Die Courier het as gevolg van vertoë oor die afgelope aantal maande besluit om sy sirkulasiegebied uit te brei ook na Laingsburg en die eerste koerant sirkuleer reeds daar.

Inwoners van Beaufort-Wes wat palmboompies van ongeveer 2 tot 3 voet hoog in hulle tuine het en dit aan die munisipaliteit wil skenk word versoek om die stadsklerk se



kantoor daarvan in kennis te stel sodat die boompies, wat met dank ontvang sal word, gehaal kan word. Dit is vir die 'Ons Groen Erfenis' viering.

Ons dank aan die Beaufort-Wes Museum vir toegang tot ou uitgawes van Die Courier



BEAUFORT-WES/BEAUFORT WEST/BHOBHOFOLO

ntoor van die Munisipale Bestuurder / Office of the Municipal Manager Kantoor van Gemeenskapsdienste / Office of Community Services

COMMUNITY NOTICE

The residents of the entire town are hereby notified of new premises the Directorate Community Services is moving to. The department is current located at N1 Support building, the municipality has been leasing the building and the rental arrangement is coming to an end on 31st August 2023.

The Youth Hub in Mandlenkosi will house the Directorate Community Services as from 1st September 2023. The following units (Traffic Court, Administration of the department Human Settlements and Fire Department) will be at the Youth Hub premises

The purpose of the move is to ensure that we utilised the limited resources the municipality has to optimize the delivery of services

THANK YOU!!

DE WELGEMOED ACTING MUNICIPAL MANAGER

Environmental Division



NOTICE OF THE ENVIRONMENTAL IMPACT ASSESSMENTS FOR THE PROPOSED HEUWELTJIES AND KRAALTJIES WIND ENERGY FACILITIES AND ASSOCIATED INFRASTRUCTURE, NEAR BEAUFORT WEST, **WESTERN CAPE PROVINCE**

- ☐ Heuweltjies WEF (DFFE Ref No: <u>14/12/16/3/3/2/2263</u>)
- Kraaltjies WEF (DFFE Ref No: 14/12/16/3/3/2/2264)

In terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) as amended and the Environmental Impact Assessment (EIA) Regulations, under Government Notices No R982, R983, R984 and R985 promulgated on 4 December 2014 (as amended), notice is hereby given that South Africa Mainstream Renewable Power Developments (Pty) Ltd (hereafter referred to as "Mainstream"), has appointed SiVEST SA (Pty) Ltd, as the independent Environmental Assessment Practitioner (EAP), to undertake the required EIA and Public Participation Processes (PPP) for the above-mentioned developments. The competent authority for the required EIA Processes is the National Department of Forestry, Fisheries and the Environment (DFFE).

PROJECT LOCATION

The proposed Heuweltjies WEF and associated infrastructure is located approximately 70km south of Beaufort West within the Prince Albert Local Municipality and the proposed Kraaltjies WEF and associated infrastructure is located approximately 52km south of Beaufort West within the Beaufort West Local Municipality. The proposed WEFs are located within the Central Karoo District Municipality in the Western Cape on the following properties

Heuweltjies WEF		Kraaltjies WEF		
		Remainder of the Farm Witpoortje No 16		Portion 10 of the Farm Brits Eigendom No 374
		Portion 8 of the Farm Klipgat No 114		Portion 25 of the Farm Brits Eigendom No 374

PROJECT DESCRIPTION

WEF: The proposed Heuweltijes WEF will comprise of up to 38 wind turbines and Kraaltijes WEF will comprise of up to 20 wind turbines. Each WEF will have a maximum export capacity of approximately 240MW. Each proposed WEF will also consist of a 11-33/132kV on-site substation (including IPP & Eskom portions). construction laydown area, Operation & Maintenance building and Battery Energy Storage Systems (BESS), located next to the proposed on-site substations, in addition to other associated infrastructure (guard house, underground cabling, roads, etc.). The overall objective of the development is to generate electricity by means of renewable energy technology capturing wind energy to feed into the National Grid.

To register as an Interested and / or Affected Party (I&AP) and / or to obtain additional information please submit your name, contact details (telephone number, postal address and email address) and the interest which you have in the application to SiVEST as per the details below and please reference 'Heuweltjies WEF', 'Kraaltjies WEF', in your correspondence

SiVEST Environmental Division:

Contact: Hlengiwe Ntuli Tel: (011) 798 0600

Fax: (011) 803 7272 E-mail: sivest_ppp@sivest.com Rivonia 2128 P O Box 2921 Website: www.sivest.com

A copy of the draft EIA Reports can be obtained on the SiVEST website at: http://www.sivest.com/za/Download, or at the Beaufort West Library (15 Church Street, Beaufort West, Western Cape) and at the Prince Albert Public Library (27 Church Street, Prince Albert, Western Cape) or emailed on request.

The comment period for the draft EIA report will run from 01 September 2023 until 02 October 2023. I.T.O POPIA, you hereby declare and confirm that you, as an I&AP providing information, consent for your information to be gathered, stored and distributed

HESPEROS