

The Avifauna Scoping Assessment for the proposed Phala Photovoltaic (PV) Facility

Bela Bela, Limpopo Province

October 2022

CLIENT



Prepared by:

The Biodiversity Company
Cell: +27 81 319 1225

Fax: +27 86 527 1965

info@thebiodiversitycompany.com www.thebiodiversitycompany.com



Table of Contents

1	Introduction	1
1.1	Background	1
1.2	Specialist Details	4
1.3	Scope of Work	5
2	Key Legislative Requirements	5
3	Methods	5
3.1	Desktop Assessment	5
3.1.1	Desktop Avifaunal Assessment	6
3.1.2	Ecologically Important Landscape Features	6
3.1.3	Field Survey	7
3.1.4	Site Ecological Importance (SEI)	8
3.2	Assumptions and Limitations	10
4	Results & Discussion	. 11
4.1	Desktop Assessment	. 11
4.1.1	Ecologically Important Landscape Features	11
4.1.2	Avifauna Expected	. 22
5	Impact Identification	. 25
6	Conclusion	. 26
7	References	. 27
8	Appendix Items	28
8.1	Appendix A – Specialist Declaration of Independence	. 28





List of Tables

Table 2-1 the Limpopo	A list of key legislative requirements relevant to biodiversity and conservation Province	
Table 3-1	Summary of Conservation Importance (CI) criteria	. 8
Table 3-2	Summary of Functional Integrity (FI) criteria	. 9
Table 3-3 and Conser	Matrix used to derive Biodiversity Importance (BI) from Functional Integrity (Fvation Importance (CI)	-
Table 3-4	Summary of Resource Resilience (RR) criteria	. 9
Table 3-5 (RR) and Bi	Matrix used to derive Site Ecological Importance (SEI) from Receptor Resilience iodiversity Importance (BI)	
Table 3-6 proposed de	Guidelines for interpreting Site Ecological Importance (SEI) in the context of the evelopment activities1	
Table 4-1 landscape f	Summary of relevance of the proposed project to ecologically importa eatures1	
Table 4-2	Threatened avifauna species that are expected to occur within the project are 22	a.
Table 5-1	Scoping evaluation table summarising the impacts identified to avifauna2	25
	List of Figures	
Figure 1-1	Proposed location of the project area in relation to the nearby towns	. 2
Figure 1-2	The project area	. 3
Figure 4-1	Map illustrating the ecosystem threat status associated with the project area 1	12
Figure 4-2	Map illustrating the ecosystem protection level associated with the project are 13	эа
Figure 4-3	Map illustrating the locations of CBAs in the project area	14
Figure 4-4	The project area in relation to the protected areas	15
Figure 4-5	The project area in relation to the National Protected Area Expansion Strateg	ЭУ
Figure 4-6	The project area in relation to the nearest IBAs	17
Figure 4-7	The project area in relation to the EGI corridors	18
Figure 4-8 relation to the	Map illustrating ecosystem threat status of rivers and wetland ecosystems he project area	
Figure 4-9	The project area in relation to the National Freshwater Ecosystem Priority Area 20	as



Avifauna Scoping Assessment

Proposed PV Facility



Figure 4-10	The project area in relation to the closest CAR route	21
Figure 4-11	The project area in relation to the CWAC site	22





1 Introduction

1.1 Background

The Biodiversity Company was appointed to undertake an avifauna scoping assessment for the proposed Phala Solar Photovoltaic (PV) project near Bela, Limpopo Province (Figure 1-2). The project area of interest (PAOI) is located 500 m from Bela Bela town centre and transverse the R101 and the R516 roads.

The approach was informed by the Environmental Impact Assessment Regulations. 2014 (GNR 326, 7 April 2017) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA). The approach has taken cognisance of the recently published Government Notices 320 (20 March 2020) in terms of NEMA, dated 20 March and 30 October 2020: "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" (Reporting Criteria). The National Web based Environmental Screening Tool has characterised the terrestrial theme sensitivity of the project area as "Very High" and the animal theme sensitivity as "Medium".

This report, after taking into consideration the findings and recommendations provided by the specialist herein, should inform and guide the Environmental Assessment Practitioner (EAP) and regulatory authorities, enabling informed decision making, as to the ecological viability of the proposed project.



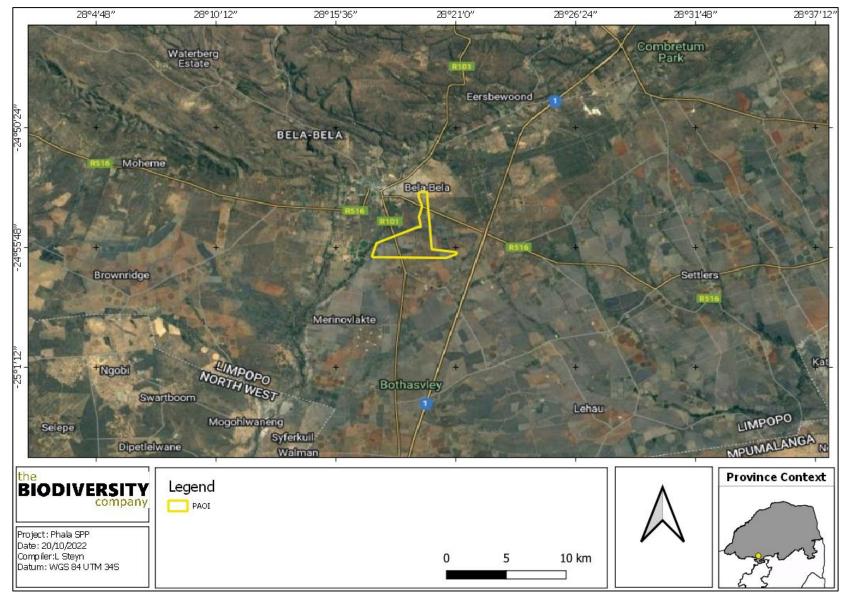


Figure 1-1 Proposed location of the project area in relation to the nearby towns



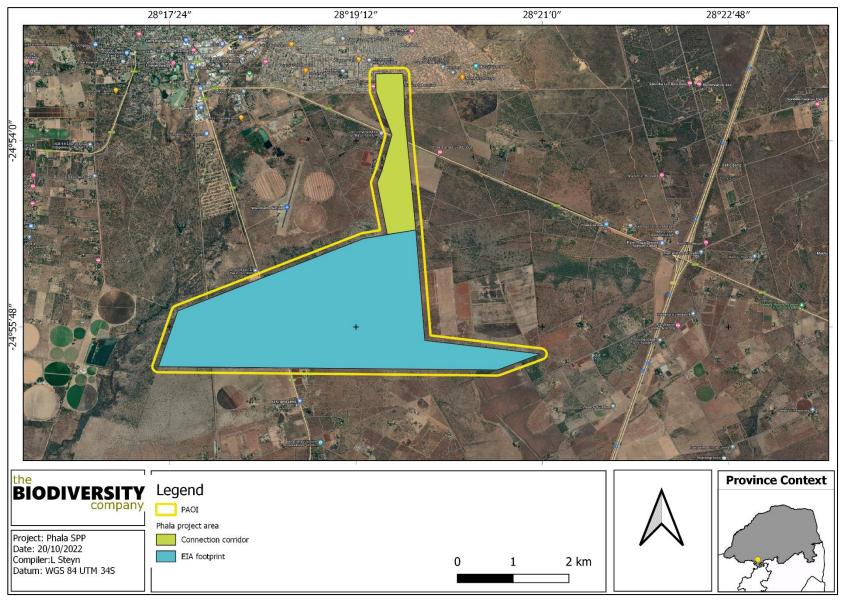


Figure 1-2 The project area



1.2 Specialist Details

Report Name	The Avifauna Scoping Assessment for the proposed Phala Photovoltaic (PV) Facility			
Reference	Phala PV			
Submitted to	ENVIRONAMICS			
	Lindi Steyn			
Report Writer	Dr Lindi Steyn has completed her PhD in Biodivers Johannesburg. Lindi is a terrestrial ecologist with completed numerous studies ranging from Basic Assessments following IFC standards.	a special interest in ornithology. She has		
	Andrew Husted	HAX		
Reviewer	Andrew Husted is Pr Sci Nat registered (400213/11) Science, Environmental Science and Aquatic Scie Biodiversity Specialist with more than 13 years' exper	ence. Andrew is an Aquatic, Wetland and		
The Biodiversity Company and its associates operate as independent consultants under auspice of the South African Council for Natural Scientific Professions. We declare that we have no affiliation with or vested financial interests in the proponent, other than for work performed uponents the Environmental Impact Assessment Regulations, 2017. We have no conflicting interests in undertaking of this activity and have no interests in secondary developments resulting from authorisation of this project. We have no vested interest in the project, other than to provide professional service within the constraints of the project (timing, time and budget) based on principals of science.				



1.3 Scope of Work

The scope of work includes the following:

- Desktop assessment to identify the relevant ecologically important geographical features within the project area;
- Desktop assessment to compile an expected species list and identify possible threatened avifauna species that occur within the project area; and
- Identify the manner that the proposed project based on the desktop information impacts the avifauna as well as the habitat and evaluate the level of risk of these potential impacts.

2 Key Legislative Requirements

The legislation, policies and guidelines listed below in Table 2-1 are applicable to the current project. The list below, although extensive, may not be complete and other legislation, policies and guidelines may apply in addition to those listed below.

Table 2-1 A list of key legislative requirements relevant to biodiversity and conservation in the Limpopo Province

Region	Legislation / Guideline
	Constitution of the Republic of South Africa (Act No. 108 of 1996)
	The National Environmental Management Act (NEMA) (Act No. 107 of 1998)
	The National Environmental Management: Protected Areas Act (Act No. 57 of 2003)
	The National Environmental Management: Biodiversity Act (Act No. 10 of 2004), Threatened or Protected Species Regulations
	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, GNR 320 of Government Gazette 43310 (March 2020)
	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, GNR 1150 of Government Gazette 43855 (October 2020)
N. a.	The National Environmental Management: Waste Act, 2008 (Act 59 of 2008);
National	The Environment Conservation Act (Act No. 73 of 1989)
	Natural Scientific Professions Act (Act No. 27 of 2003)
	National Biodiversity Framework (NBF, 2009)
	National Forest Act (Act No. 84 of 1998)
	National Veld and Forest Fire Act (101 of 1998)
	National Water Act (NWA) (Act No. 36 of 1998)
	Municipal Systems Act (Act No. 32 of 2000)
	Alien and Invasive Species Regulations and, Alien and Invasive Species List 20142020, published under NEMBA
	Conservation of Agricultural Resources Act, 1983 (Act 43 of 1983) (CARA)
Provincial	The Limpopo Conservation Plan 2018
i Tovillolai	Limpopo Environmental Management Act (2003)

3 Methods

3.1 Desktop Assessment

The desktop assessment was principally undertaken using a Geographic Information System (GIS) to access the latest available spatial datasets to develop digital cartographs and species lists. These datasets and their date of publishing are provided below.





3.1.1 Desktop Avifaunal Assessment

The avifaunal desktop assessment comprised of the following, compiling an expected species list:

- Avifauna list, generated from the SABAP2 dataset by looking at pentads 2445_2810;
 2445_2815; 2445_2820; 2450_2810; 2450_2815; 2450_2820; 2455_2810 and 2455_2815;
 2455_2820; and
- Compilation of a Coordinated Water Bird Count (CWAC) species list if the project area was found to be in a vicinity of a CWAC site.

3.1.2 Ecologically Important Landscape Features

Existing ecologically relevant data layers were incorporated into a GIS to establish how the proposed project might interact with any ecologically important entities. Emphasis was placed around the following spatial datasets:

- National Biodiversity Assessment 2018 (Skowno et al, 2019) (NBA) The purpose of the NBA is to assess the state of South Africa's biodiversity based on best available science, with a view to understanding trends over time and informing policy and decision-making across a range of sectors. The NBA deals with all three components of biodiversity: genes, species, and ecosystems; and assesses biodiversity and ecosystems across terrestrial, freshwater, estuarine and marine environments. The two headline indicators assessed in the NBA are:
 - Ecosystem Threat Status indicator of an ecosystem's wellbeing, based on the level
 of change in structure, function or composition. Ecosystem types are categorised as
 Critically Endangered (CR), Endangered (EN), Vulnerable (VU), Near Threatened (NT)
 or Least Concern (LC), based on the proportion of the original extent of each
 ecosystem type that remains in good ecological condition.
 - Ecosystem Protection Level indicator of the extent to which ecosystems are adequately protected or under-protected. Ecosystem types are categorised as Well Protected (WP), Moderately Protected (MP), Poorly Protected (PP), or Not Protected (NP), based on the proportion of the biodiversity target for each ecosystem type that is included within one or more protected areas. NP, PP or MP ecosystem types are collectively referred to as under-protected ecosystems.
- Protected areas South Africa Protected Areas Database (SAPAD) (DEA, 2021) The SAPAD Database contains spatial data pertinent to the conservation of South African biodiversity. It includes spatial and attribute information for both formally protected areas and areas that have less formal protection. SAPAD is updated on a continuous basis and forms the basis for the Register of Protected Areas, which is a legislative requirement under the National Environmental Management: Protected Areas Act, Act 57 of 2003.
- National Protected Areas Expansion Strategy (NPAES) (SANBI, 2016) The NPAES provides spatial information on areas that are suitable for terrestrial ecosystem protection. These focus areas are large, intact and unfragmented and therefore, of high importance for biodiversity, climate resilience and freshwater protection.
- Conservation/Biodiversity Sector Plan:

The Limpopo Conservation Plan was completed in 2018 for the Limpopo Department of Economic Development, Environment & Tourism (LEDET) (Desmet *et al.*, 2018). The purpose of the LCPv2 was to develop the spatial component of a bioregional plan (i.e. map of Critical Biodiversity Areas and associated land-use guidelines). The previous Limpopo Conservation Plan (LCPv1) was completely revised and updated (Desmet et al., 2013). A Limpopo Conservation Plan map was produced as part of this plan and sites were assigned to the





following CBA categories based on their biodiversity characteristics, spatial configuration and requirement for meeting targets for both biodiversity pattern and ecological processes:

- Critical Biodiversity Area 1 (CBA1);
- Critical Biodiversity Area 2 (CBA2);
- Ecological Support Area 1 (ESA1);
- Ecological Support Area 2 (ESA2);
- Other Natural Area (ONA);
- o Protected Area (PA); and
- No Natural Remaining (NNR).

Critical Biodiversity Areas (CBAs) are terrestrial and aquatic areas of the landscape that need to be maintained in a natural or near-natural state to ensure the continued existence and functioning of species and ecosystems and the delivery of ecosystem services. Thus, if these areas are not maintained in a natural or near natural state then biodiversity targets cannot be met. Maintaining an area in a natural state can include a variety of biodiversity compatible land uses and resource uses (Desmet et al., 2013).

Ecological Support Areas (ESA's) are not essential for meeting biodiversity targets but play an important role in supporting the ecological functioning of Critical Biodiversity Areas and/or in delivering ecosystem services (SANBI, 2017). Critical Biodiversity Areas and Ecological Support Areas may be terrestrial or aquatic.

Other Natural Areas (ONAs) consist of all those areas in good or fair ecological condition that fall outside the protected area network and have not been identified as CBAs or ESAs. A biodiversity sector plan or bioregional plan must not specify the desired state/management objectives for ONAs or provide land-use guidelines for ONAs (Driver et al., 2017).

Areas with No Natural Habitat Remaining (NNR) are areas in poor ecological condition that have not been identified as CBAs or ESAs. They include all irreversibly modified areas (such as urban or industrial areas and mines), and most severely modified areas (such as cultivated fields and forestry plantations). A biodiversity sector plan or bioregional plan must not specify the desired state/management objective or provide land-use guidelines for NNR areas (Driver et al., 2017).

- Important Bird and Biodiversity Areas (IBAs) (BirdLife South Africa, 2017) IBAs constitute a
 global network of over 13 500 sites, of which 112 sites are found in South Africa. IBAs are sites
 of global significance for bird conservation, identified through multi-stakeholder processes
 using globally standardised, quantitative and scientifically agreed criteria; and
- South African Inventory of Inland Aquatic Ecosystems (SAIIAE) (Van Deventer et al., 2018) –
 A SAIIAE was established during the NBA of 2018. It is a collection of data layers that represent
 the extent of river and inland wetland ecosystem types and pressures on these systems.

3.1.3 Field Survey

The avifaunal field survey will be comprised of the following techniques:

 Visual and auditory searches - This typically comprises of meandering and using binoculars to view species from a distance without them being disturbed; and listening to species calls;





- Point counts for the avifauna Sampling will consist of standardized point counts as well as random diurnal incidental surveys and vantage point surveys. Standardized point counts (following Buckland et al. 1993) will be conducted to gather data on the species composition and relative abundance of species within the broad habitat types identified. Each point count was run over a 10 min period. The horizontal detection limit will be set at 200 m. At each point the observer will document the date, start time, and end time, habitat, numbers of each species, detection method (seen or heard), behaviour (perched or flying) and general notes on habitat and nesting suitability for conservation important species. To supplement the species inventory with cryptic and illusive species that may not be detected during the rigid point count protocol, diurnal incidental searches will be conducted. This involved the opportunistic sampling of species between point count periods and road cruising; and
- Utilization of local knowledge.

Relevant field guides and texts that will be consulted for identification purposes included the following:

- Book of birds of South Africa, Lesotho and Swaziland (Taylor et al., 2015); and
- Roberts Birds of Southern Africa (Hockey et al., 2005).

3.1.4 Site Ecological Importance (SEI)

The different habitat types within the assessment area were delineated and identified based on observations during the field assessment as well as available satellite imagery. These habitat types were assigned Ecological Importance (EI) categories based on their ecological integrity, conservation value, the presence of species of conservation concern and their ecosystem processes.

Site Ecological Importance (SEI) is a function of the Biodiversity Importance (BI) of the receptor (e.g., SCC, the vegetation/fauna community or habitat type present on the site) and Receptor Resilience (RR) (its resilience to impacts) as follows.

BI is a function of Conservation Importance (CI) and the Functional Integrity (FI) of the receptor as follows. The criteria for the CI and FI ratings are provided in Table 3-1 and Table 3-2, respectively.

Table 3-1 Summary of Conservation Importance (CI) criteria

Conservation Importance	Fulfilling Criteria
Very High	Confirmed or highly likely occurrence of CR, EN, VU or Extremely Rare or Critically Rare species that have a global EOO of < 10 km ² . Any area of natural habitat of a CR ecosystem type or large area (> 0.1% of the total ecosystem type extent) of natural habitat of an EN ecosystem type. Globally significant populations of congregatory species (> 10% of global population).
High	Confirmed or highly likely occurrence of CR, EN, VU species that have a global EOO of > 10 km². IUCN threatened species (CR, EN, VU) must be listed under any criterion other than A. If listed as threatened only under Criterion A, include if there are less than 10 locations or < 10 000 mature individuals remaining. Small area (> 0.01% but < 0.1% of the total ecosystem type extent) of natural habitat of EN ecosystem type or large area (> 0.1%) of natural habitat of VU ecosystem type. Presence of Rare species. Globally significant populations of congregatory species (> 1% but < 10% of global population).
Medium	Confirmed or highly likely occurrence of populations of NT species, threatened species (CR, EN, VU) listed under Criterion A only and which have more than 10 locations or more than 10 000 mature individuals. Any area of natural habitat of threatened ecosystem type with status of VU. Presence of range-restricted species. > 50% of receptor contains natural habitat with potential to support SCC.
Low	No confirmed or highly likely populations of SCC. No confirmed or highly likely populations of range-restricted species. < 50% of receptor contains natural habitat with limited potential to support SCC.
Very Low	No confirmed and highly unlikely populations of SCC. No confirmed and highly unlikely populations of range-restricted species. No natural habitat remaining.





Table 3-2 Summary of Functional Integrity (FI) criteria

Functional Integrity	Fulfilling Criteria				
	Very large (> 100 ha) intact area for any conservation status of ecosystem type or > 5 ha for CR ecosystem types.				
Very High	High habitat connectivity serving as functional ecological corridors, limited road network between intact habitat patches.				
	No or minimal current negative ecological impacts with no signs of major past disturbance.				
	Large (> 20 ha but < 100 ha) intact area for any conservation status of ecosystem type or > 10 ha for EN ecosystem types.				
High	Good habitat connectivity with potentially functional ecological corridors and a regularly used road network between intact habitat patches.				
	Only minor current negative ecological impacts with no signs of major past disturbance and good rehabilitation potential.				
	Medium (> 5 ha but < 20 ha) semi-intact area for any conservation status of ecosystem type or > 20 ha for VU				
	ecosystem types.				
Medium	Only narrow corridors of good habitat connectivity or larger areas of poor habitat connectivity and a busy used road network between intact habitat patches.				
	Mostly minor current negative ecological impacts with some major impacts and a few signs of minor past disturbance. Moderate rehabilitation potential.				
	Small (> 1 ha but < 5 ha) area.				
	Almost no habitat connectivity but migrations still possible across some modified or degraded natural habitat				
Low	and a very busy used road network surrounds the area.				
	Low rehabilitation potential.				
	Several minor and major current negative ecological impacts.				
.,	Very small (< 1 ha) area.				
Very Low	No habitat connectivity except for flying species or flora with wind-dispersed seeds.				
	Several major current negative ecological impacts.				

BI can be derived from a simple matrix of CI and FI as provided in Table 3-3.

Table 3-3 Matrix used to derive Biodiversity Importance (BI) from Functional Integrity (FI) and Conservation Importance (CI)

Biodiversity Importance (BI)		Conservation Importance (CI)				
		Very high	High	Medium	Low	Very low
īfy	Very high	Very high	Very high	High	Medium	Low
Integrity	High	Very high	High	Medium	Medium	Low
nal Ir (FI)	Medium	High	Medium	Medium	Low	Very low
Functional I	Low	Medium	Medium	Low	Low	Very low
T I	Very low	Medium	Low	Very low	Very low	Very low

The fulfilling criteria to evaluate RR are based on the estimated recovery time required to restore an appreciable portion of functionality to the receptor as summarised in Table 3-4.

Table 3-4 Summary of Resource Resilience (RR) criteria

Resilience	Fulfilling Criteria
Very High	Habitat that can recover rapidly (~ less than 5 years) to restore > 75% of the original species composition and functionality of the receptor functionality, or species that have a very high likelihood of remaining at a site even when a disturbance or impact is occurring, or species that have a very high likelihood of returning to a site once the disturbance or impact has been removed.
High	Habitat that can recover relatively quickly (~ 5–10 years) to restore > 75% of the original species composition and functionality of the receptor functionality, or species that have a high likelihood of remaining at a site even when a disturbance or impact is occurring, or species that have a high likelihood of returning to a site once the disturbance or impact has been removed.
Medium	Will recover slowly (~ more than 10 years) to restore > 75% of the original species composition and functionality of the receptor functionality, or species that have a moderate likelihood of remaining at a site even





Resilience	Fulfilling Criteria
	when a disturbance or impact is occurring, or species that have a moderate likelihood of returning to a site once the disturbance or impact has been removed.
Low	Habitat that is unlikely to be able to recover fully after a relatively long period: > 15 years required to restore ~ less than 50% of the original species composition and functionality of the receptor functionality, or species that have a low likelihood of remaining at a site even when a disturbance or impact is occurring, or species that have a low likelihood of returning to a site once the disturbance or impact has been removed.
Very Low	Habitat that is unable to recover from major impacts, or species that are unlikely to remain at a site even when a disturbance or impact is occurring, or species that are unlikely to return to a site once the disturbance or impact has been removed.

Subsequent to the determination of the BI and RR, the SEI can be ascertained using the matrix as provided in Table 3-5.

Table 3-5 Matrix used to derive Site Ecological Importance (SEI) from Receptor Resilience (RR) and Biodiversity Importance (BI)

Site Ecological Importance (SEI)		Biodiversity Importance (BI)				
		Very high	High	Medium	Low	Very low
es	Very Low	Very high	Very high	High	Medium	Low
Resilience :R)	Low	Very high	Very high	High	Medium	Very low
or Res (RR)	Medium	Very high	High	Medium	Low	Very low
Receptor Res (RR)	High	High	Medium	Low	Very low	Very low
Re	Very High	Medium	Low	Very low	Very low	Very low

Interpretation of the SEI in the context of the proposed development activities is provided in Table 3-6.

Table 3-6 Guidelines for interpreting Site Ecological Importance (SEI) in the context of the proposed development activities

Site Ecological Importance (SEI)	Interpretation in relation to proposed development activities
Very High	Avoidance mitigation – no destructive development activities should be considered. Offset mitigation not acceptable/not possible (i.e., last remaining populations of species, last remaining good condition patches of ecosystems/unique species assemblages). Destructive impacts for species/ecosystems where persistence target remains.
High	Avoidance mitigation wherever possible. Minimisation mitigation – changes to project infrastructure design to limit the amount of habitat impacted, limited development activities of low impact acceptable. Offset mitigation may be required for high impact activities.
Medium	Minimisation and restoration mitigation – development activities of medium impact acceptable followed by appropriate restoration activities.
Low	Minimisation and restoration mitigation – development activities of medium to high impact acceptable followed by appropriate restoration activities.
Very Low	Minimisation mitigation – development activities of medium to high impact acceptable and restoration activities may not be required.

The SEI evaluated for each taxon can be combined into a single multi-taxon evaluation of SEI for the assessment area. Either a combination of the maximum SEI for each receptor should be applied, or the SEI may be evaluated only once per receptor but for all necessary taxa simultaneously. For the latter, justification of the SEI for each receptor is based on the criteria that conforms to the highest CI and FI, and the lowest RR across all taxa.

3.2 Assumptions and Limitations

The following assumptions and limitations are applicable for this assessment:





- The assessment area was based on the area provided by the client and any alterations to the footprint and/or missing GIS information pertaining to the assessment area would have affected the desktop assessment;
- No infrastructure designs were available at time of the desktop assessment;
- · The species likelihood of occurrence is based on desktop information; and
- The impact assessment included is for scoping purposes alone and is based on desktop information.

4 Results & Discussion

4.1 Desktop Assessment

4.1.1 Ecologically Important Landscape Features

The GIS analysis pertaining to the relevance of the proposed project to ecologically important landscape features is summarised in Table 4-1.

Table 4-1 Summary of relevance of the proposed project to ecologically important landscape features.

Desktop Information Considered	Description	Section
Ecosystem Threat Status	Overlaps with a Vulnerable ecosystem.	4.1.1.1
Ecosystem Protection Level	Overlaps with a Poorly Protected Ecosystem.	4.1.1.2
Protected Areas	The closest protected area is the Rissik Private Nature reserve 4.9 km to the east of the project area	4.1.1.4
National Protected Areas Expansion Strategy	The PAOI also lies adjacent to a protected area according to the NPAES dataset	4.1.1.5
Critical Biodiversity Area	The proposed project is situated across an Ecological Support Area 1 (ESA 1), a No Natural Habitat Remaining (NNR), a Critical Biodiversity Area 1, a Critical Biodiversity Area 2 and a protected area	4.1.1.3
Important Bird and Biodiversity Areas	The project area is located 14 km from the Waterberg IBA	4.1.1.6
REDZ	The project area is 71 km from the closest Renewable Energy Development Zone.	-
Powerline Corridor	The PAOI is 62 km from the International corridor.	4.1.1.7
South African Inventory of Inland Aquatic Ecosystems	The project area does not overlap with any wetlands or rivers, however the closest river is 120 m west of the PAOI	4.1.1.8
National Freshwater Priority Area	The PAOI does not overlap with neither wetlands nor rivers, however an unclassified river can be found 120 m to the west.	4.1.1.9
Coordinated Avifaunal Road Count	The project area is 52 km from the closest CAR route.	4.1.1.10
Coordinated Waterbird Count	The project area is 15 km from the closest CWAC	4.1.1.11

4.1.1.1 Ecosystem Threat Status

The Ecosystem Threat Status is an indicator of an ecosystem's wellbeing, based on the level of change in structure, function or composition. Ecosystem types are categorised as Critically Endangered (CR), Endangered (EN), Vulnerable (VU), Near Threatened (NT) or Least Concern (LC), based on the proportion of the original extent of each ecosystem type that remains in good ecological condition. According to the spatial dataset the proposed project overlaps with a VU ecosystem (Figure 4-1).





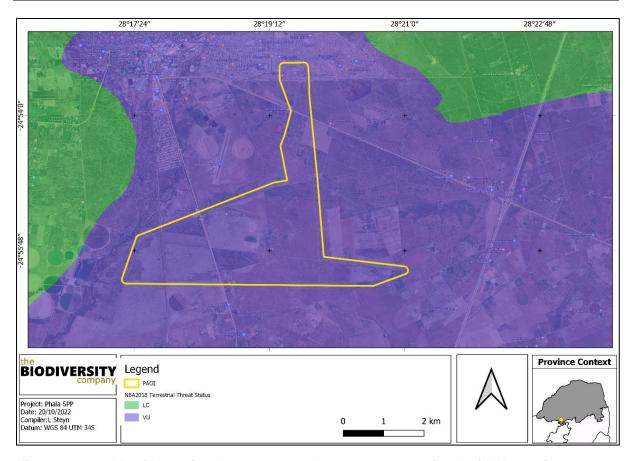


Figure 4-1 Map illustrating the ecosystem threat status associated with the project area

4.1.1.2 Ecosystem Protection Level

This is an indicator of the extent to which ecosystems are adequately protected or under-protected. Ecosystem types are categorised as Well Protected (WP), Moderately Protected (MP), Poorly Protected (PP), or Not Protected (NP), based on the proportion of the biodiversity target for each ecosystem type that is included within one or more protected areas. NP, PP or MP ecosystem types are collectively referred to as under-protected ecosystems. The proposed project overlaps with a PP ecosystem (Figure 4-2).



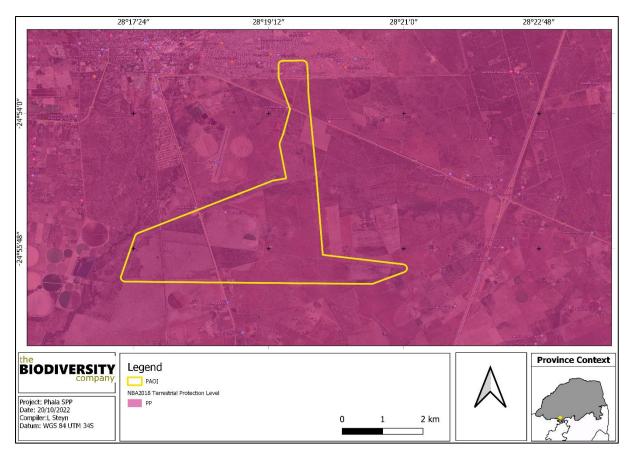


Figure 4-2 Map illustrating the ecosystem protection level associated with the project area

4.1.1.3 Critical Biodiversity Areas and Ecological Support Areas

The proposed project is situated across an Ecological Support Area 1 (ESA 1), a No Natural Habitat Remaining (NNR), a Critical Biodiversity Area 1, a Critical Biodiversity Area 2 and a protected area (Figure 4-3). The majority of the project area is classified as an ESA, the ESA 1 area is the most sensitive category after the CBA 1 and CBA 2 categories.



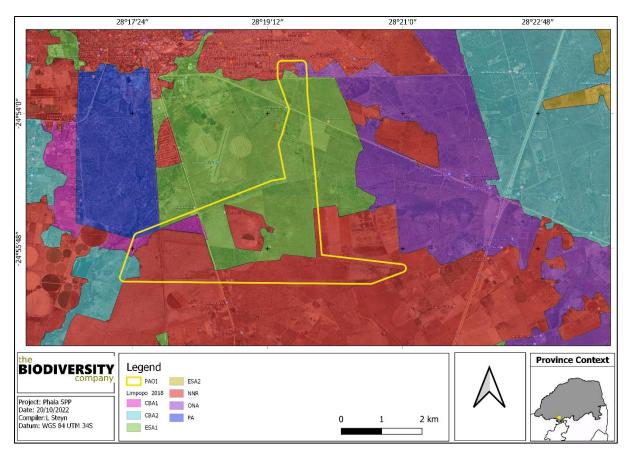


Figure 4-3 Map illustrating the locations of CBAs in the project area

4.1.1.4 Protected areas

According to the protected area spatial datasets from SAPAD (2021) and SACAD (2021), the protected area as identified by the Limpopo Conservation Plan does not appear in this dataset. According to the SAPAD (2022) dataset the closest protected area is the Rissik Private Nature reserve 4.9 km to the east of the project area (Figure 4-4).



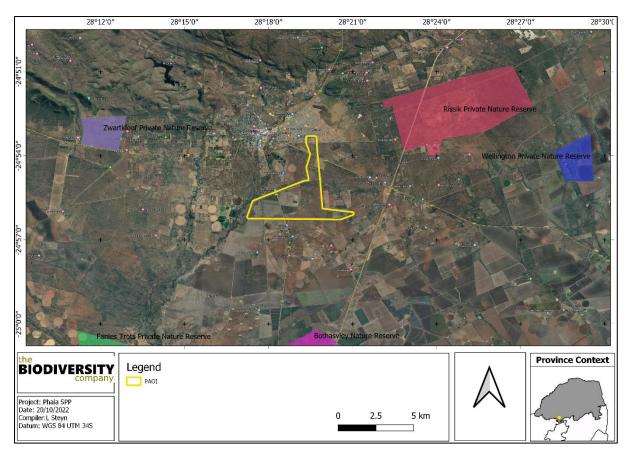


Figure 4-4 The project area in relation to the protected areas

4.1.1.5 National Protected Area Expansion Strategy

National Protected Area Expansion Strategy 2016 (NPAES) areas were identified through a systematic biodiversity planning process. They present the best opportunities for meeting the ecosystem-specific protected area targets set in the NPAES and were designed with a strong emphasis on climate change resilience and requirements for protecting freshwater ecosystems. These areas should not be seen as future boundaries of protected areas, as in many cases only a portion of a particular focus area would be required to meet the protected area targets set in the NPAES. They are also not a replacement for fine scale planning which may identify a range of different priority sites based on local requirements, constraints and opportunities (NPAES, 2016). The PAOI also lies adjacent to a protected area according to the NPAES dataset (Figure 4-5).



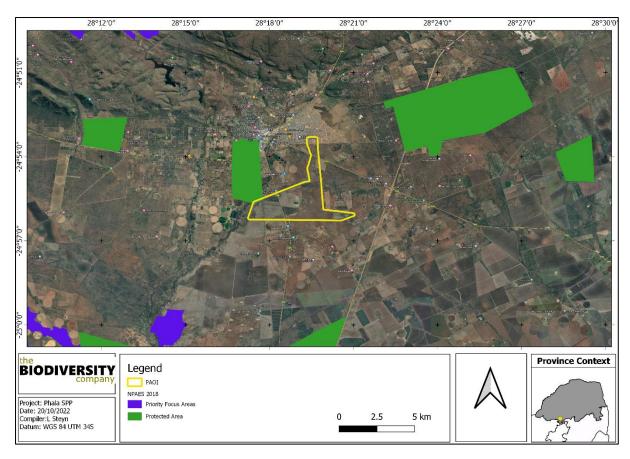


Figure 4-5 The project area in relation to the National Protected Area Expansion Strategy

4.1.1.6 Important Bird and Biodiversity Area

Important Bird & Biodiversity Areas (IBAs) are the sites of international significance for the conservation of the world's birds and other conservation significant species as identified by BirdLife International. These sites are also all Key Biodiversity Areas; sites that contribute significantly to the global persistence of biodiversity (Birdlife South Africa, 2017).

According to Birdlife South Africa (2017), the selection of IBAs is achieved through the application of quantitative ornithological criteria, grounded in up-to-date knowledge of the sizes and trends of bird populations. The criteria ensure that the sites selected as IBAs have true significance for the international conservation of bird populations and provide a common currency that all IBAs adhere to, thus creating consistency among, and enabling comparability between, sites at national, continental and global levels. Figure 4-6 shows that the project area is located 14 km from the Waterberg IBA.



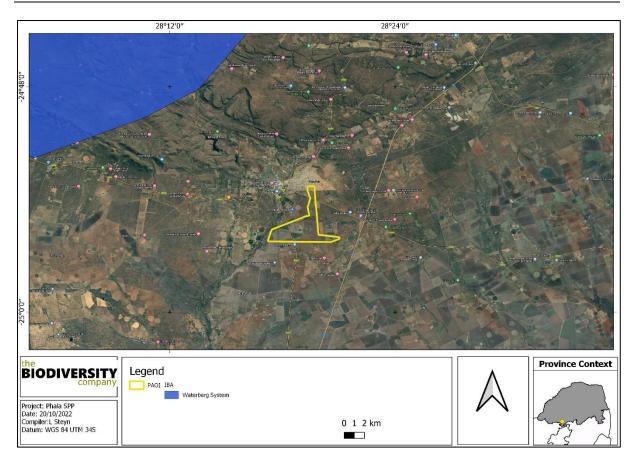


Figure 4-6 The project area in relation to the nearest IBAs

4.1.1.7 Strategic Transmission Corridors (EGI)

On the 16 February 2018 Minister Edna Molewa published Government Notice No. 113 in Government Gazette No. 41445 which identified 5 strategic transmission corridors important for the planning of electricity transmission and distribution infrastructure as well as procedure to be followed when applying for environmental authorisation for electricity transmission and distribution expansion when occurring in these corridors.

On 29 April 2021, Minister Barbara Dallas Creecy published Government Notice No. 383 in Government Gazette No. 44504, which expanded the eastern and western transmission corridors and gave notice of the applicability of the application procedures identified in Government Notice No. 113, to these expanded corridors. More information on this can be obtained from https://egis.environment.gov.za/egi.

Figure 4-7 shows the PAOI is 62 km from the International corridor.



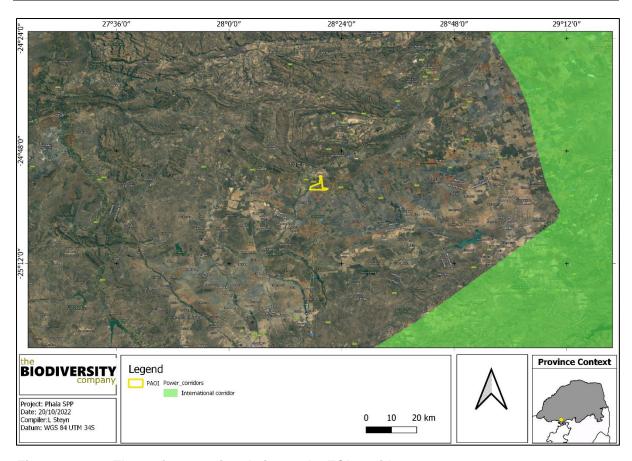


Figure 4-7 The project area in relation to the EGI corridors

4.1.1.8 Hydrological Setting

The South African Inventory of Inland Aquatic Ecosystems (SAIIAE) was released with the NBA 2018. Ecosystem threat status (ETS) of river and wetland ecosystem types are based on the extent to which each river ecosystem type had been altered from its natural condition. Ecosystem types are categorised as CR, EN, VU or LT, with CR, EN and VU ecosystem types collectively referred to as 'threatened' (Van Deventer *et al.*, 2019; Skowno *et al.*, 2019).

The project area does not overlap with any wetlands or rivers, however the closest river is 120 m west of the PAOI (Figure 4-8).



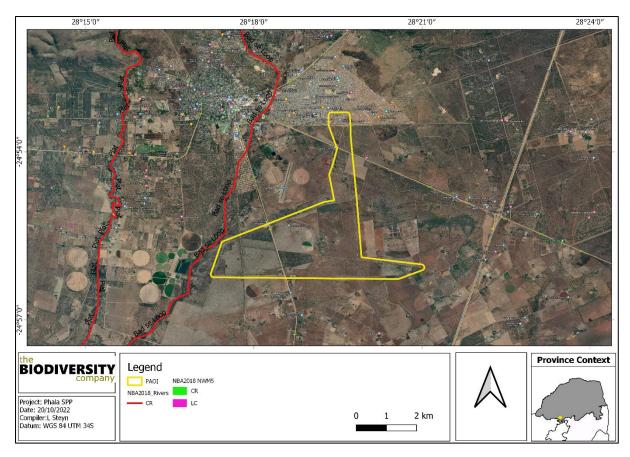


Figure 4-8 Map illustrating ecosystem threat status of rivers and wetland ecosystems in relation to the project area

4.1.1.9 National Freshwater Ecosystem Priority Area Status

In an attempt to better conserve aquatic ecosystems, South Africa has categorised its river systems according to set ecological criteria (i.e., ecosystem representation, water yield, connectivity, unique features, and threatened taxa) to identify Freshwater Ecosystem Priority Areas (FEPAs) (Driver et al., 2011). The FEPAs are intended to be conservation support tools and envisioned to guide the effective implementation of measures to achieve the National Environment Management Biodiversity Act's (NEM:BA) biodiversity goals (Nel et al., 2011).

Figure 4-9 shows that the PAOI does not overlap with neither wetlands nor rivers, however an unclassified river can be found 120 m to the west.



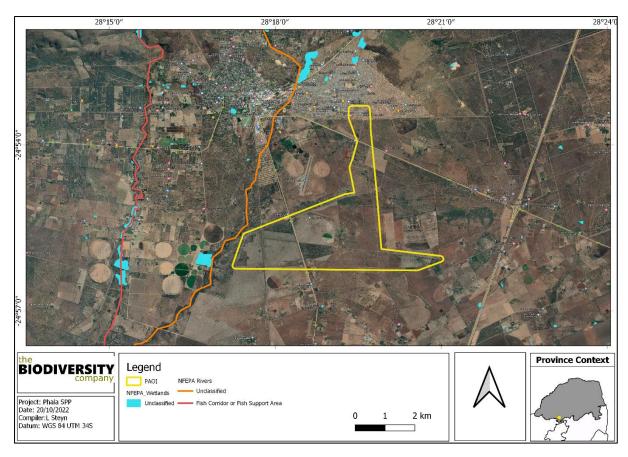


Figure 4-9 The project area in relation to the National Freshwater Ecosystem Priority Areas

4.1.1.10 Coordinated Avifaunal Roadcount (CAR)

The ADU/Cape bird club pioneered avifaunal roadcount of larger birds in 1993 in South africa. Originally it was started to monitor the Blue Crane *Anthropoides paradiseus* and Denham's/Stanley's Bustard *Neotis denhami*. Today it has been expanded to the monitoring of 36 species of large terrestrial birds (cranes, bustards, korhaans, storks, Secretarybird and Southern Bald Ibis) along 350 fixed routes covering over 19 000 km. Twice a year, in midsummer (the last Saturday in January) and midwinter (the last Saturday in July), roadcounts are carried out using this standardised method. These counts are important for the conservation of these larger species that are under threat due to loss of habitat through changes in land use, increases in crop agriculture and human population densities, poisoning as well as man-made structures like power lines. With the prospect of wind and solar farms to increase the use of renewable energy sources monitoring of these species is most important (CAR, 2020). Figure 4-10 shows that the project area is 52 km from the closest CAR route.



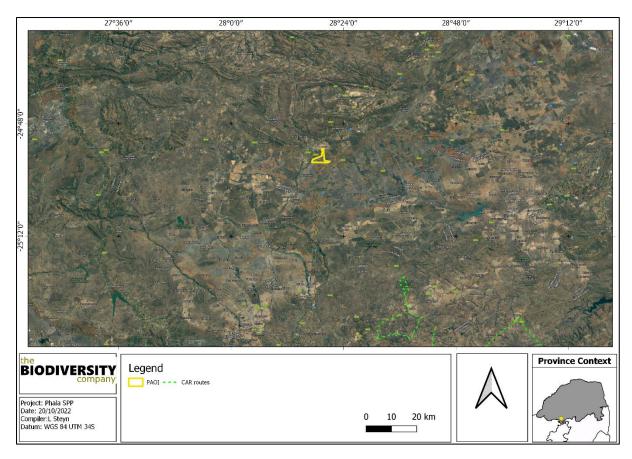


Figure 4-10 The project area in relation to the closest CAR route

4.1.1.11 Coordinated Waterbird Counts (CWAC)

The Animal demographic unit launched the Coordinated Waterbird Counts (CWAC) project in 1992 as part South Africa's commitment to International waterbird conservation. Regular mid-summer and midwinter censuses are done to determine the various features of water birds including population size, how waterbirds utilise water sources and determining the heath of wetlands. For a full description of CWAC please refer to http://cwac.birdmap.africa/about.php.

Figure 4-11 shows the project area is 15 km from the Rhenosterpoort Plaas CWAC.



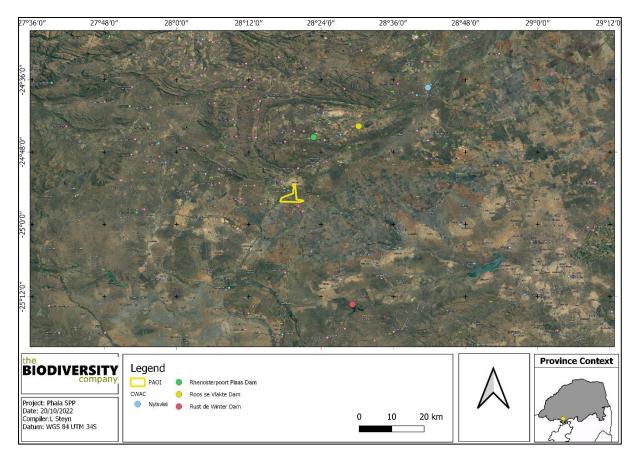


Figure 4-11 The project area in relation to the CWAC site

4.1.2 Avifauna Expected

The SABAP2 Data lists 357 avifauna species that could be expected to occur within the project area (The full list will be provided in the final assessment). Eighteen (18) of these expected species are regarded as threatened (Table 4-2). Three (3) of the species have a low likelihood of occurrence due to the expected lack of suitable habitat in the project area, these species can however very likely still move over the project area and can still be influenced by the development.

Table 4-2 Threatened avifauna species that are expected to occur within the project area.

Species	Common Name	Conservation Status		131 131 1 10	
		Regional (SANBI, 2016)	IUCN (2021)	Likelihood of Occurrence	
Alcedo semitorquata	Kingfisher, Half-collared	NT	LC	High	
Aquila verreauxii	Eagle, Verreaux's	VU	LC	Moderate	
Ciconia abdimii	Stork, Abdim's	NT	LC	Moderate	
Ciconia nigra	Stork, Black	VU	LC	Moderate	
Coracias garrulus	Roller, European	NT	LC	High	
Falco biarmicus	Falcon, Lanner	VU	LC	High	
Falco vespertinus	Falcon, Red-footed	NT	NT	High	
Glareola nordmanni	Pratincole, Black-winged	NT	NT	Low	
Grus paradisea	Crane, Blue	NT	VU	Low	
Gyps africanus	Vulture, White-backed	CR	CR	High	
Gyps coprotheres	Vulture, Cape	EN	EN	High	



Leptoptilos crumenifer	Stork, Marabou	NT	LC	High
Mycteria ibis	Stork, Yellow-billed	EN	LC	Moderate
Neotis denhami	Bustard, Denham's	VU	NT	Moderate
Polemaetus bellicosus	Eagle, Martial	EN	EN	High
Sagittarius serpentarius	Secretarybird	VU	EN	High
Torgos tracheliotos	Vulture, Lappet-faced	EN	EN	High
Tyto capensis	Grass-owl, African	VU	LC	Low

Alcedo semitorquata (Half-collared Kingfisher) is listed as NT on a regional scale and occurs across a large range. This species generally prefers narrow rivers, streams, and estuaries with dense vegetation onshore, but it may also move into coastal lagoons and lakes. It mainly feeds on fish (IUCN, 2017). The possibility of occurrence is high due to the proximity of the project area to the Bad Se Loop river and the onsite water resource.

Aquila verreauxii (Verreaux's Eagle) is listed as VU on a regional scale and LC on a global scale. This species is locally persecuted in southern Africa where it coincides with livestock farms, but because the species does not take carrion, is little threatened by poisoned carcasses. Where hyraxes are hunted for food and skins, eagle populations have declined (IUCN, 2017). Based on the expected habitat, the close proximity of the Waterberg mountains and the availability of prey items, the likelihood of occurrence of this species at the project area is rated as moderate.

Ciconia abdimii (Abdim's Stork) is listed as NT on a local and international scale and the species is known to be found in open grassland and savanna woodland often near water but also in semi-arid areas, gathering beside pools and water-holes (IUCN, 2017). Non-breeding visitor to southern Africa, departing from its northern breeding grounds in the period from May-August, eventually arriving in southern Africa at the onset of the rainy season in the period from October-December. It is nomadic in southern Africa, moving in response to food availability. It gathers in large flocks then departs in February, March and early April. It mainly eats large insects, doing most of its foraging on pastures, irrigated land and recently ploughed fields, usually in groups which split up to cover more ground. The habitat might create suitable feeding habitat, therefore the likelihood of occurrence is rated as moderate.

Ciconia nigra (Black Stork) is native to South Africa, and inhabits old, undisturbed, open forests. They are known to forage in shallow streams, pools, marshes swampy patches, damp meadows, flood-plains, pools in dry riverbeds and occasionally grasslands, especially where there are stands of reeds or long grass (IUCN, 2017). It is unlikely that this species would breed in the project area due to the lack of forested areas, however some suitable foraging habitat remains in the form of the open grasslands and wetland areas, and as such the likelihood of occurrence is rated as moderate.

Coracias garrulous (European Roller) is a summer migrant with the population from South-central Europe and Asia occurring throughout sub-Saharan Africa. The European Roller has a preference for bushy plains and dry savannah areas. It is globally listed as LC (BirdLife International, 2019a) but NT on a regional scale (Taylor *et al,* 2015). Threats include persecution on migration in some Mediterranean countries and numerous individuals are killed for food in Oman and India. The loss of suitable breeding habitat due to changing agricultural practices, conversion to monoculture, loss of nest sites, and use of pesticides (reducing food availability) are the main threats to the species in Europe (BirdLife International, 2019a). It is sensitive to loss of hedgerows and riparian forest in Europe which provide essential habitats for perching and nesting. The savannah habitat in the project area creates a high likelihood of occurrence.

Falco biarmicus (Lanner Falcon) is native to South Africa and inhabits a wide variety of habitats, from lowland deserts to forested mountains (IUCN, 2017). They may occur in groups up to 20 individuals but have also been observed solitary. Their diet is mainly composed of small birds such as pigeons and





francolins. The likelihood of incidental records of this species in the project area is rated as high due to the natural veld condition and the presence of many bird species on which Lanner Falcons may predate.

Falco vespertinus (Red-footed Falcon) is known to breed from eastern Europe and northern Asia to north-western China, heading south in the non-breeding season to southern Angola and southern Africa. Within southern Africa it is locally uncommon to common in Botswana, northern Namibia, central Zimbabwe and the area in and around Gauteng, South Africa (Hockey *et al*, 2005). The habitat it generally prefers is open habitats with scattered trees, such as open grassy woodland, wetlands, forest fringes and croplands. Many of these habitats are present in the project area and thus the likelihood of occurrence is rated as high.

Gyps africanus (White-backed Vulture) is the most widespread and common vulture in Africa, ranging from the northernmost countries within sub-Saharan Africa south to South Africa (IUCN, 2017). It mainly occupies lowland, open wooded savannas, particularly areas of *Vachellia* and needs tall trees for nesting (IUCN, 2017). However, there have been records of White-backed Vultures nesting on electricity pylons in South Africa (IUCN, 2017). It is threatened largely by the same threats to other African vulture species, such as habitat conversion to agro-pastoral systems, loss of wild ungulates leading to a reduced availability of carrion, hunting for trade, persecution and poisoning (IUCN, 2017). The presence of open savannas within the project area contributed to a high likelihood of occurrence for this species.

Gyps coprotheres (Cape Vulture) is found in southern Africa, where it prefers protected areas and woody vegetation for foraging and steep cliffs for roosting (IUCN, 2017). Various threats are leading to a decline in this species' population numbers, including poisoning (deliberate and accidental), collision with cables, wind farm developments, habitat loss and unsustainable harvesting for traditional uses (IUCN, 2017). Suitable food at the nearby reserves increases the likelihood of occurrence and it is rated as high.

Leptoptilos crumenifer (Marabou Stork) is a large bird of the Ciconiidae family. This species is found in both wet and arid habitat, often near human inhabitation, due to the waste dumps where they scavage. It's a colonial breeder and builds their nests in larger trees. Based on suitable habitat in the project area for this species the likelihood of occurrence is rated as high.

Mycteria ibis (Yellow-billed Stork) is listed as EN on a regional scale and LC on a global scale. This species is migratory and has a large distributional range which includes much of sub-Saharan Africa. It is typically associated with freshwater ecosystems, especially wetlands and the margins of lakes and dams (IUCN, 2017). The presence of water bodies adjacent to and some smaller ones in the POAI creates a moderate possibility that this species may occur there.

Neotis denhami (Denhams Bustard) is listed as VU on a regional scale and NT on a global scale. It occurs in flat, arid, mostly open country such as grassland, karoo, bushveld, thornveld, scrubland and savanna but also including modified habitats such as wheat fields and firebreaks Collisions with power lines may be a significant threat in parts of the range, particularly South Africa (IUCN, 2007). The habitat at the project area does provide marginally suitable habitat for this species and therefore it's likelihood of occurrence is rated as moderate.

Polemaetus bellicosus (Martial Eagle) is listed as EN on a regional scale and EN on a global scale. This species has an extensive range across much of sub-Saharan Africa, but populations are declining due to deliberate and incidental poisoning, habitat loss, reduction in available prey, pollution and collisions with power lines (IUCN, 2017). It inhabits open woodland, wooded savanna, bushy grassland, thorn-bush and, in southern Africa, more open country and even sub-desert (IUCN, 2017). The savannah habitat in the project area is highly suitable for this species as such the likelihood of occurrence is rated as high.

Sagittarius serpentarius (Secretary bird) occurs in sub-Saharan Africa and inhabits grasslands, open plains, and lightly wooded savanna. It is also found in agricultural areas and sub-desert (IUCN, 2017).





The likelihood of occurrence is rated as high due to the grasslands and wetland areas present in the project area.

Torgos tracheliotus (Lappet-faced Vulture) is listed as EN, both on a regional and global level. Only a small, very rapidly declining population remains, owing primarily to poisoning and persecution, as well as ecosystem alterations (IUCN, 2017). The species inhabits dry savanna, arid plains, deserts and open mountain. It ranges widely when foraging and is mainly a scavenger, feeding predominantly on any large carcasses or their remains. Suitable nesting areas as well as foraging habitat occur in the project area, therefore the likelihood of occurrence is rated as high.

5 Impact Identification

Anthropogenic activities drive habitat destruction causing displacement of fauna and flora and possibly direct mortality. Land clearing destroys local wildlife habitat and can lead to the loss of local breeding grounds, nesting sites and movement/flight corridors. The removal of natural vegetation may reduce the habitat available for avifauna species and may reduce the species compositions within the area.

The project area overlaps with an ESA1, CBA1 and CBA2 area. A total of 357 avifauna species that could be expected to occur within the PAOI of which eighteen (18) are regarded as threatened. The main impacts associated with avifauna is the loss of habitat, collision and electrocution risks.

Table 5-1 Scoping evaluation table summarising the impacts identified to avifauna

Impact Biodiversity loss/disturbance			
Issue	Nature of Impact	Extent of Impact	No-Go Areas
Destruction, fragmentation and degradation of habitats and ecosystems	Direct impacts: Disturbance / degradation / loss to vegetation and habitats Ecological corridors are disrupted Habitat fragmentation Indirect impacts: Erosion risk increases Fire risk increases Increase in invasive alien species	Regional	None identified at this stage
Direct mortality of avifauna	Direct impacts: Loss of SCC species Loss of avifauna diversity due to amongst other collisions and electrocutions Indirect impacts: Loss of diversity and species composition in the area. Possible impact on the food chain	Regional/International	None identified at this stage
Reduced migration of avifauna	Direct impacts: >> Loss of genetic diversity Indirect impacts: >> Reduced seed dispersal >> Loss of ecosystem services	Regional/National	None identified at this stage
Environmental pollution due to water runoff, PV cleaning products, spills from vehicles and erosion	Direct impacts: Pollution in nearby waterbodies and the surrounding environment Avifaunal mortality (direct and indirectly) Indirect impacts: Ground water pollution Loss of ecosystem services	Regional	None identified at this stage





	Direct impacts:		
Disruption/alteration of ecological life cycles (breeding, migration, feeding) due to noise, dust, heat radiation and light pollution.	Disruption/alteration of ecological life cycles due to noise Avifaunal mortality due to light pollution (nocturnal species becoming more visible to predators) Heat radiation could lead to the displacement of species Indirect impacts: Loss of ecosystem services	Regional	None identified at this stage
Staff and others interacting directly with avifauna (potentially dangerous) or poaching of birds/eggs	Direct impacts: >> Loss of SCCs species Indirect impacts: >> Loss of ecosystem service >> Loss of genetic diversity	Regional	None identified at this stage

Description of expected significance of impact

The development of the area could result in the loss or degradation of the habitat and vegetation, most of which is still in a natural condition and is expected to support a number of avifauna species. The construction of the solar facility could also lead to the displacement/mortalities of the avifauna and more specifically SCC avifauna species. The operation could result in collisions and electrocutions.

Gaps in knowledge & recommendations for further study

- This is completed at a desktop level only.
- >> Identification and descriptions of habitats.
- >> Identification of the Site Ecological Importance.
- Location and identification of SCCs as well as in the case of avifauna their location of the nests.
- >> Determine a suitable buffer width for the identified features.

Recommendations with regards to general field surveys

- » Field surveys to prioritise the development areas.
- Fieldwork to be undertaken during the wet season period.
- Avifauna assessment field work to be conducted over two seasons to ensure migratory species are considered.

6 Conclusion

Based on the desktop assessment it can be said that the project area is sensitive with a moderate to high likelihood of species of conservation concern occurring. This assumption is based on the CBA1 and CBA 2 classification of the area as well as the CR river within 120 m from the PAOI. A total of 357 avifauna species that could be expected to occur within the project area of which eighteen (18) are regarded as threatened.

The development of the area could result in the loss or degradation of the habitat and vegetation, most of which is still likely in a natural condition and is expected to support a number of avifauna species. The construction of the solar facility could also lead to the displacement/mortalities of the avifauna and more specifically SCC avifauna species. The operation could also result in collisions and electrocutions.





7 References

Bird Atlas Project (SABAP2). (2022). http://vmus.adu.org.za/

BirdLife South Africa. (2017). Important Bird Areas Factsheet. http://www.birdlife.org

BirdLife South Africa. (2018a). Dronfield. https://www.birdlife.org.za/iba-directory/dronfield/

BGIS (Biodiversity GIS). (2017). http://bgis.sanbi.org/

IUCN. (2021). The IUCN Red List of Threatened Species. www.iucnredlist.org

National Environmental Screening Tool. (2017). https://screening.environment.gov.za/screeningtool/index.html#/pages/welcome)

NBA. (2018). National Biodiversity Assessment spatial data. http://bgis.sanbi.org/

Nel, J.L., Murray, K.M., Maherry, A.M., Petersen, C.P., Roux, D.J., Driver, A., Hill, L., Van Deventer, H., Funke, N., Swartz, E.R., Smith-Adao, L.B., Mbona, N., Downsborough, L. & Nienaber, S. (2011). Technical Report for the National Freshwater Ecosystem Priority Areas project. WRC Report No. K5/1801.

SADAP (South Africa Protected Areas Database) and SACAD (South Africa Conservation Areas Database). (2021). http://egis.environment.gov.za

SANBI. (2017). Red List of South African Plants version 2017.1. Redlist.sanbi.org

SANBI-BGIS. (2017). Technical guidelines for CBA Maps: Guidelines for developing a map of Critical Biodiversity Areas & Ecological Support Areas using systematic biodiversity planning.

Sinclair, I., Hockey, P. & Tarboton, W. (2002). Sasol Birds of Southern Africa – Third Edition. Struik Publishers, Cape Town.

Skowno, A.L., Raimondo, D.C., Poole, C.J., Fizzotti, B. & Slingsby, J.A. (Eds.). (2019). South African National Biodiversity Assessment 2018 Technical Report Volume 1: Terrestrial Realm. South African National Biodiversity Institute, Pretoria.

Van Deventer, H., Smith-Adao, L., Collins, N.B., Grenfell, M., Grundling, A., Grundling, P-L., Impson, D., Job, N., Lötter, M., Ollis, D., Petersen, C., Scherman, P., Sieben, E., Snaddon, K., Tererai, F. & Van der Colff D. (2019). *South African National Biodiversity Assessment 2018: Technical Report.* Volume 2b: Inland Aquatic (Freshwater) Realm. CSIR report number CSIR/NRE/ECOS/IR/2019/0004/A. South African National Biodiversity Institute, Pretoria. http://hdl.handle.net/20.500.12143/6230.

Van Deventer, H., Smith-Adao, L., Mbona, N., Petersen, C., Skowno, A., Collins, N.B., Grenfell, M., Job, N., Lötter, M., Ollis, D., Scherman, P., Sieben, E. & Snaddon, K. (2018). South African National Biodiversity Assessment 2018: Technical Report. Volume 2a: South African Inventory of Inland Aquatic Ecosystems (SAIIAE). Version 3, final released on 3 October 2019. Council for Scientific and Industrial Research (CSIR) and South African National Biodiversity Institute (SANBI): Pretoria, South Africa.





8 Appendix Items

8.1 Appendix A – Specialist Declaration of Independence

I, Lindi Steyn, declare that:

- I act as the independent specialist in this application;
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, regulations, and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in
 my possession that reasonably has or may have the potential of influencing any decision to be
 taken with respect to the application by the competent authority; and the objectivity of any
 report, plan, or document to be prepared by myself for submission to the competent authority;
- All the particulars furnished by me in this form are true and correct; and
- I realise that a false declaration is an offence in terms of Regulation 71 and is punishable in terms of Section 24F of the Act.



Lindi Steyn

Terrestrial Ecologist

The Biodiversity Company

October 2022

