



SiVEST SA (PTY) LTD

PROPOSED CONSTRUCTION OF THE KAREE WIND ENERGY FACILITY AND ASSOCIATED GRID INFRASTRUCTURE, NEAR CERES, WESTERN CAPE PROVINCE, SOUTH AFRICA

Terrestrial Biodiversity Assessment

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PROPOSED CONSTRUCTION OF THE PATATSKLOOF WIND ENERGY FACILITY AND ASSOCIATED GRID INFRASTRUCTURE, NEAR CERES, WESTERN CAPE PROVINCE, SOUTH AFRICA

TERRESTRIAL BIODIVERSITY ASSESSMENT

EXECUTIVE SUMMARY

South Africa Mainstream Renewable Power Developments (Pty) Ltd (hereafter referred to as "Mainstream"), has appointed SiVEST SA (Pty) Ltd (hereafter referred to as "SiVEST") to undertake the required BA Processes for the proposed construction of the 250MW Patatskloof WEF and associated grid infrastructure near Touws River in the Western Cape Province.

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.

It is anticipated that the proposed Patatskloof WEF will comprise thirty-five (35) wind turbines with a maximum total energy generation capacity of up to approximately 250MW. The electricity generated by the proposed WEF development will be fed into the national grid via a 132kV overhead power line.

In terms of the Environmental Impact Assessment (EIA) Regulations, which were published on 04 December 2014 [GNR 982, 983, 984 and 985) and amended on 07 April 2017 [promulgated in Government Gazette 40772 and Government Notice (GN) R326, R327, R325 and R324 on 7 April 2017], various aspects of the proposed development are considered listed activities under GNR 327 and GNR 324 which may have an impact on the environment and therefore require authorisation from the National Competent Authority (CA), namely the Department of Environment, Forestry and Fisheries (DFFE), prior to the commencement of such activities. Specialist studies have been commissioned to assess and verify the project under the new Gazetted specialist protocols.

The regulatory requirements are also discussed with regard the NEMA and the National Water Act in Section 4 of this report. The PROTOCOL FOR SPECIALIST ASSESSMENT AND MINIMUM REPORT CONTENT REQUIREMENTS FOR THE ENVIRONMENTAL IMPACTS ON BIODIVERSITY and Appendix 6 of the NEMA EIA Regulations, have been adhered to.

This report fulfils the Biodiversity Specialist Assessment Report criteria for assessment listed under the various Theme Sensitivity Protocols, where the following sensitivity ratings were contained in the Screening Tool Report

- Animal Species Combined High related to a potential occurrence of the Critically Endangered Riverine Rabbit (*Bunolagus monticularis*). Several birds are also listed but these are discussed in the Avifaunal report.
- Plant Species Medium sensitivity due to the potential presence of several importance species listed by the screening tool results. Noting that most are species associated with fynbos

vegetation units located in the southern portion of the study area, and not affected by the proposed layout. The protocol does not allow for the listing of the names of some of these species under threat within public documents and is only made known to the specialist conducting the assessment.

• Terrestrial Biodiversity – Very High sensitivity related to the presence of an CBAs, Ecological Support Area (ESA) and the NFEPA listed under Point 2 above.

The verification of any of the Very High Sensitivity rated habitats / species localities is thus critical as the proposed development should then avoid these areas. During the screening assessment, a four day site visit of the area was conducted in November 2021, in which the habitats / species listed above were considered, together with a description of the general environment and species assemblages found present. This spatial data will then be supplied to the Applicant to develop the layout outside of these areas (inclusive of suitable buffers) as a mechanism of impact avoidance using fine scale mapping data.

The study area had received some much-needed winter rainfall, which aided in critically assessing the ecological character of the site, with particular reference to any linkages between the aquatic and terrestrial environment as indicated in the Screening Tool Results (CBA, ESA & NFEPA). The information collected, was also compared to previous assessments within the region by members of EnviroSci, used in the assessment of the wind farms that have been completed.

In summary three key terrestrial habitats were observed and mapped and then rated based on their sensitivity to the proposed development, with a fourth habitat associated more with the aquatic environment. These habitats included:

- 1. Ruschia quartzites (within in study area but no development take place in these areas)
- 2. Tanqua karoo Pteronia pallens / Zygophyllum shrubland
- 3. Renosterveld & Fynbos
- 4. Tanqua Wash Riviere

The sensitivity assessment mentioned considered the habitats observed and these were categorised or rated based on the presence/absence of the following:

- Unique or sensitive habitats
- Presence of importance or listed taxa (faunal & floral)
- Intact and functional habitat associated with sensitive areas indicated in the DFFE Screening Tool results

Several High Sensitivity Habitats were thus observed and mapped, and these were then considered No-Go for any new infrastructure, while Moderate and Low sensitivity areas could be considered for development. The only exception being road crossings and transmission lines which would be considered acceptable within No-Go areas, if these areas are spanned and/ or located within existing disturbance footprints (e.g. roads within existing farm tracks) and/or suitably mitigated.

The following direct impacts were identified, which are aligned with those contained in the Biodiversity Assessment Protocol and will be assessed in greater detail in this EIA phase of the assessment: Construction and to a degree the Operational and Decommissioning Phases where relevant

Construction & Decommissioning Phases

- Impact 1: Loss of species of special concern
- Impact 2: Loss of terrestrial habitats flora and vegetation
- Impact 3: Loss of terrestrial species fauna

Operational phase

• Impact 4: Loss of terrestrial species - fauna

The project overall has a small footprint spread out over a large area, allowing for retention of much of the natural environment so that the systems should remain largely unaffected. Therefore, the wind farm is such that it carries a low intensity impact on terrestrial resources but requiring the clearing of areas with terrestrial vegetation.

A variety of environmental features were observed within the study area and these were mapped and buffered as necessary for their protection. The current layout has the potential, to a large degree, avoided the most sensitive features and buffer areas, greatly reducing the potential overall impact and environmental risk. The overall and cumulative impacts, as assessed, are linked to instances where complete avoidance was not possible, or the nature of the activities involve a potential risk. Overall, it is expected that the impact on the environment would be Low (-). Noteworthy areas, that should be avoided, include the Very High Sensitivity areas as shown in this report.

Based on the findings of this study, the specialist finds no reason to withhold to an authorisation of any of the proposed activities, assuming that key mitigations measures are implemented. Lastly no preference is provided with regard the grid connections, as it assumed based on the uniform characteristics of the site, while making use of existing tracks, however technical considerations have resulted in Substation Option 2 being selected. Further it is recommended that WTG 20 should be moved out of the Renosterveld / Fynbos area.

However, this must all still be assessed once the roads layout has been provided, coupled to a micrositing walkdown once all information is available.

NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND ENVIRONMENTAL IMPACT REGULATIONS, 2014 (AS AMENDED) - REQUIREMENTS FOR SPECIALIST REPORTS (APPENDIX 6)

Regula Appen	tion GNR 326 of 4 December 2014, as amended 7 April 2017, dix 6	Section of Report
1. (1) A a)	 specialist report prepared in terms of these Regulations must containdetails of- i. the specialist who prepared the report; and ii. the expertise of that specialist to compile a specialist report including a curriculum vitae; 	Appendix 1 CV
b)	a declaration that the specialist is independent in a form as may be specified by the competent authority;	Attached to Report
c)	an indication of the scope of, and the purpose for which, the report was prepared;	Section 1.1 and 1.3 of this report
	(cA) an indication of the quality and age of base data used for the specialist report;	Section 1.3
	(cB) a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	Section 5
d)	the date and season of the site investigation and the relevance of the season to the outcome of the assessment;	Section 1.3 and 5
e)	a description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used;	Section 1.3
f)	details of an assessment of the specific identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of a site plan identifying site alternatives;	Section 5.1
g)	an identification of any areas to be avoided, including buffers;	Section 5 & 6
h)	a map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers;	Section 5
i)	a description of any assumptions made and any uncertainties or gaps in knowledge;	Section 2
j)	a description of the findings and potential implications of such findings on the impact of the proposed activity, (including identified alternatives on the environment) or activities;	Section 6 & 8

k)	any mitigation measures for inclusion in the EMPr;	Section 6
I)	any conditions for inclusion in the environmental authorisation;	Section 5. 6 and 8
m)	any monitoring requirements for inclusion in the EMPr or environmental authorisation;	Section 6
n)	a reasoned opinion- i. (as to) whether the proposed activity, activities or portions thereof should be authorised;	Section 8
	 (iA) regarding the acceptability of the proposed activity or activities; and 	
	ii. if the opinion is that the proposed activity, activities or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan;	
o)	a description of any consultation process that was undertaken during the course of preparing the specialist report;	N/A
p)	a summary and copies of any comments received during any consultation process and where applicable all responses thereto; and	N/A
q)	any other information requested by the competent authority.	N/A
protoco	ere a government notice <i>gazetted</i> by the Minister provides for any I or minimum information requirement to be applied to a specialist the requirements as indicated in such notice will apply.	Yes - Appendix 2

SiVEST SA (PTY) LTD

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TERRESTRIAL BIODIVERSITY ASSESSMENT

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Glossary of Terms

- Alien vegetation: Plants that do not occur naturally within the area but have been introduced either intentionally or unintentionally. Vegetation species that originate from outside of the borders of the biome -usually international in origin.
- **Biome**: A broad ecological unit representing major life zones of large natural areas defined mainly by vegetation structure and climate.
- Indigenous vegetation: Vegetation occurring naturally within a defined area.
- **RDL (Red Data listed):** Species Organisms that fall into the Extinct in the Wild (EW), critically endangered (CR), Endangered (EN), Vulnerable (VU) categories of ecological status.
- SCC (Species of Conservation Concern): The term SCC in the context of this report refers to all RDL (Red Data) and IUCN (International Union for the Conservation of Nature) listed species as well as protected species of relevance to the project.

List of Abbreviations

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It is anticipated that the proposed Patatskloof WEF will comprise thirty-five (35) wind turbines with a maximum total energy generation capacity of up to approximately 250MW. The electricity generated by the proposed WEF development will be fed into the national grid via a 132kV overhead power line.

In terms of the Environmental Impact Assessment (EIA) Regulations, which were published on 04 December 2014 [GNR 982, 983, 984 and 985) and amended on 07 April 2017 [promulgated in Government Gazette 40772 and Government Notice (GN) R326, R327, R325 and R324 on 7 April 2017], various aspects of the proposed development are considered listed activities under GNR 327 and GNR 324 which may have an impact on the environment and therefore require authorisation from the National Competent Authority (CA), namely the Department of Environment, Forestry and Fisheries (DFFE), prior to the commencement of such activities. Specialist studies have been commissioned to assess and verify the project under the new Gazetted specialist protocols.

1.1 Terms of Reference

Please refer to Specialist ToR provided.

1.2 Specialist Credentials

Please see Appendix 1 - Specialist CVs

1.3 Assessment Methodology

These assessments were conducted using the following assessment process based on 4 days field work conducted in November 2021, early summer, but after several good winter months with rainfall, therefore many of the plants were showing improved growth and most had or were flowering after a prolonged period of drought in the region:

Methodology summary

(Excluding birds and avifaunal)

A desktop and literature review of the area under investigation was conducted to collate as much information as possible prior to any detailed fieldwork. The purpose of the desktop assessment is to rank relevant areas according to their ecological sensitivity and to identify areas of ecological risk prior to the site visit.

Other relevant literature for e.g. Global Biodiversity Information Facility, Virtual Atlas Projects, iNaturalist, relevant Red Data books, ordinances and all systematic bioregional / conservation plans.

Fieldwork was limited to visual sightings by means of transect walks and plot-based sampling, while particular attention will also be paid to the occurrence Red Data species or Protected species as follows:

Vegetation units was sampled by means of the following techniques as per each site:

- Data collection was plot-based and in the form of vegetation samples within selected reference areas to categorise the various vegetation units.
- Results from the data analysis provided a description of the dominant and typical species occurring on the site(s), and included:
 - Threatened, endemic or rare species, with an indication of the relative functionality and conservation importance of the specific community in the area under investigation

- \circ $\;$ Invasive or exotic species present and localities in the area
- The functional and conservation importance of all vegetation communities in the investigation area

Mammals were sampled by means of the following techniques:

- Fieldwork will include visual sightings by means of transect walks to evaluate the presence of mammal taxa. During the site visit, specific attention will be given to signs (droppings, burrows, vocalisations, etc.) of taxa and the presence of suitable habitat
- 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
- A full list of species observed and expected to occur will then be included
- Specific reference will be made to the occurrence of Red Data species

Herpetofauna (reptiles & amphibians) were sampled by means of the following techniques:

- Visual observations (including nocturnal surveys)
- Installation of pitfall traps and two drift fence arrays. Data collected from these will also be included in the EIA phase
- Active searching techniques; and
- Vocalisations (for amphibians)

Invertebrates will be sampled by means of the following techniques:

- Random linear transects using a standard handnets while focussing on specific indicator groups;
- All taxa caught, were identified to species level if appropriate literature is available (as in the case of butterflies), otherwise the concept known as RTU's (Recognisable Taxonomic Units) or morphospecies was applied;
- The presence of conservation important taxa was also be verified by intensive searching of likely habitat types or burrows.
- Additional information of faunal community residing on the area of investigation were sourced from distributional data/records (both recent and historical), relevant literature, the private sector and other atlas projects.

Habitat areas (based on the species compositions of the vegetation analysis, topography and soils) was then be ranked into High / No-Go, Medium or Low classes in terms of their significance based on the Ecological Sensitivity and Conservation Importance based. A sensitivity and habitat map (including buffer zones if applicable) was produced based on the above information. This combined with the aquatic sensitivity map will then be used by the proponent to finalise the development layout in the remaining phases of the project.

2. ASSUMPTIONS AND LIMITATIONS

To obtain a comprehensive understanding of the dynamics of both the flora and fauna of communities within a study site, as well as the status of endemic, rare or threatened species in any area, assessments should always consider investigations at different time scales (across seasons/years) and through replication. However, due to time constraints these long-term studies are not feasible and are thus mostly based on instantaneous sampling. This limitation is common to many impact assessment type studies, but the findings are deemed adequate for the purposes of decision-making support regarding project acceptability, unless otherwise stated.

Therefore, due to the scope of the work presented in this report, a long-term investigation of the proposed site was not possible and as such not perceived as part of the Terms of Reference. However, a concerted effort was made to sample and assess as much of the potential site, as well as make use of any supporting literature, species distribution data and aerial photography.

It should be emphasised that information, as presented in this document, only has reference to the study area as indicated on the accompanying maps. Therefore, this information cannot be applied to any other area without detailed investigation.

TECHNICAL DESCRIPTION

The proposed WEF and associated grid infrastructure is located approximately 18km and 25km north-east respectively of Touws River in the Western Cape Province and is within the Witzenberg Local Municipality, in the Cape Winelands District Municipality (**Error! Reference source not found.**).

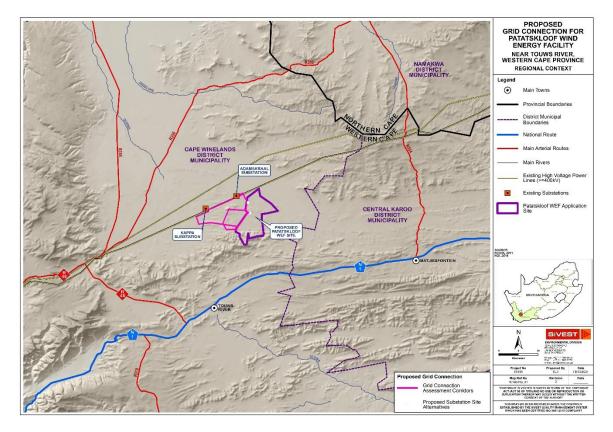


Figure 1: Regional Context Map

2.1.1 WEF

The WEF application site as shown on the locality map below (Error! Not a valid bookmark self-reference.) is approximately 6 612 hectares (ha) in extent and incorporates the following farm portions:

- Remainder of the Farm Upper Stinkfontein No 246
- Remainder of the Farm Upper Melkbosch Kraal No 250; and
- Portion 1 of the Farm Drinkwaters Kloof No 251.

A smaller buildable area (2 905.4 ha) has however been identified as a result of a preliminary suitability assessment undertaken by Mainstream and this area is likely to be further refined with the exclusion of sensitive areas determined through various specialist studies being conducted as part of the BA process.

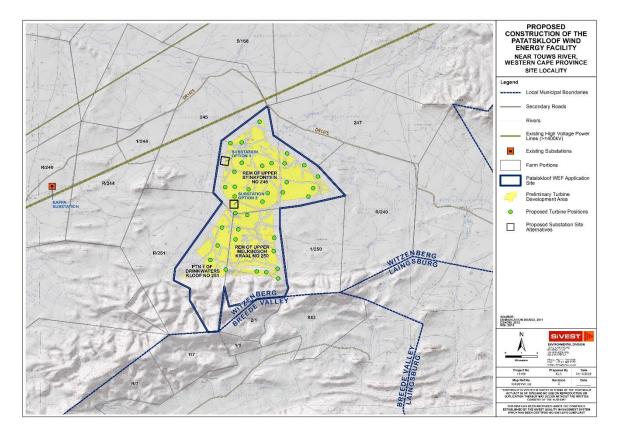


Figure 2: Patatskloof WEF Site Locality

2.1.2 Grid Connection

At this stage, it is proposed that the 132kV power lines will connect the Pataskloof WEF on-site substation to the national grid, either via Kappa Substation or via the Adamskraal substation (**Figure 3**).

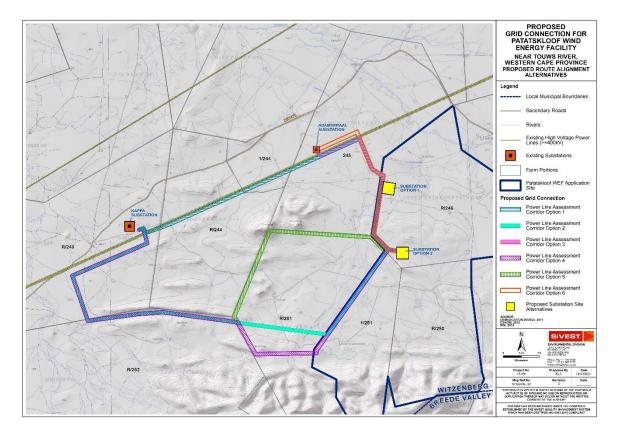


Figure 3: Proposed 132kV Power Line Route Alignment

2.2 Project Description

It is anticipated that the proposed Patatskloof WEF will comprise up to thirty-five (35) wind turbines with a maximum total energy generation capacity of up to approximately 250MW. The electricity generated by the proposed WEF development will be fed into the national grid via a 132kV overhead power line. The 132kV overhead power line will however require a separate EA and is subject to a separate BA process, which is currently being undertaken in parallel to the WEF BA process.

2.2.1 Wind Farm Components

- Up to 35 wind turbines, each between 4MW and 6.6MW, with a maximum export capacity of approximately 250MW. This will be subject to allowable limits in terms of the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP). The final number of turbines and layout of the WEF will, however, be dependent on the outcome of the Specialist Studies conducted during the BA process;
- Each wind turbine will have a hub height of between 120m and 200m and rotor diameter of up to approximately 200m;
- Permanent compacted hardstanding areas / platforms (also known as crane pads) of approximately 100m x 100m (total footprint of approx. 100 00m2) per turbine during construction and for on-going maintenance purposes for the lifetime of the proposed development;
- Each wind turbine will consist of a foundation of up to approximately 30m in diameter. In addition, the foundations will be up to approximately 4m in depth;

- Electrical transformers (690V/11 to 33kV) adjacent to each wind turbine (typical footprint of up to approximately 3m x 2.5m) to step up the voltage to between 11kV and 33kV;
- One (1) new 11kV 33/132kV on-site substation including associated equipment and infrastructure, occupying an area of approximately 2ha (i.e. 20 000m2). The proposed substation will be a step-up substation and will include an Eskom portion and an IPP portion, hence the substation has been included in the WEF BA and in the grid infrastructure (substation and 132kV overhead power line) BA to allow for handover to Eskom. Following construction, the substation will be owned and managed by Eskom. The current applicant will retain control of the low voltage components (i.e. 33kV components) of the substation, while the high voltage components (i.e. 132kV components) of this substation will be ceded to Eskom shortly after the completion of construction;
- A Battery Energy Storage System (BESS) will be located next to the onsite 33/132kV substation to be included in the 2ha substation area. The storage capacity and type of technology would be determined at a later stage during the development phase, but most likely comprise an array of containers, outdoor cabinets and/or storage tanks;
- The wind turbines will be connected to the proposed substation via 11 to 33kV underground cabling and overhead power lines.
- Road servitude of 8m and a 20m underground cable or overhead line servitude.
- Internal roads with a width of up to approximately 5m wide will provide access to each wind turbine. Existing site roads will be used wherever possible, although new site roads will be constructed where necessary. Turns will have a radius of up to 50m for abnormal loads (especially turbine blades) to access the various wind turbine positions. It should be noted that the proposed application site will be accessed via the N1 National Route and DR1475, MR316 and MR319 WCG provincial Roads; One (1) construction laydown / staging area of up to approximately 3ha to be located on the site identified for the substation. It should be noted that no construction camps will be required in order to house workers overnight as all workers will be accommodated in the nearby town;
- Operation and Maintenance (O&M) buildings, including offices, a guard house, operational control centre, O&M area / warehouse / workshop and ablution facilities to be located on the site identified for the substation. This will be included in the 2 ha substation area.
- A wind measuring lattice (approximately 120m in height) mast has already been strategically placed within the wind farm application site in order to collect data on wind conditions;
- No new fencing is envisaged at this stage. Current fencing is standard farm fence approximately 1-1.5m in height. Fencing might be upgraded (if required) to be up to approximately 2m in height; and
- Water will either be sourced from existing boreholes located within the application site or will be trucked in, should the boreholes located within the application site be limited.
- Optic fibre overhead or underground line from the Adamskraal Substation to the proposed on-site substation.

2.2.2 Grid Components

The proposed grid connection infrastructure to serve the Patatskloof WEF will include the following components:

 One (1) new 11-33/132kV on-site substation, situated on a site of occupying an area of up to approximately 2ha. The proposed substation will be a step-up substation and will include an Eskom portion and an IPP portion, hence the substation has been included in both the BA for the WEF and in the BA for the grid infrastructure to allow for handover to Eskom. The applicant will remain in control of the low voltage components (i.e. 33kV components) of the substation, while the high voltage components (i.e. 132kV components) of this substation will likely be ceded to Eskom shortly after the completion of construction; and

 One (1) new 132kV overhead power line connecting the on-site substation to either Kappa Substation or Adamskraal Substation and thereby feeding the electricity into the national grid. Power line towers being considered for this development include self-supporting suspension monopole structures for relatively straight sections of the line and angle strain towers where the route alignment bends to a significant degree. Maximum tower height is expected to be approximately 25m.

2.3 Alternatives

2.3.1 Wind Energy Facility

No other activity or site alternatives are being considered. Renewable Energy development in South Africa is highly desirable from a social, environmental and development point of view and a wind energy facility is considered suitable for this site due to the high wind resource in this area.

The choice of technology selected for the Patatskloof WEF is based on environmental constraints and technical and economic considerations. No other technology alternatives are being considered as wind energy facilities are more suitable for the site than other forms of renewable energy due to the high wind resource.

The size of the wind turbines will depend on the development area and the total generation capacity that can be produced as a result. The choice of turbine to be used will ultimately be determined by technological and economic factors at a later stage.

Design and layout alternatives will be considered and assessed as part of the EIA. These include alternatives for the Substation locations and also for the construction / laydown area. The proposed preliminary layout is shown in **Error! Reference source not found.** below.

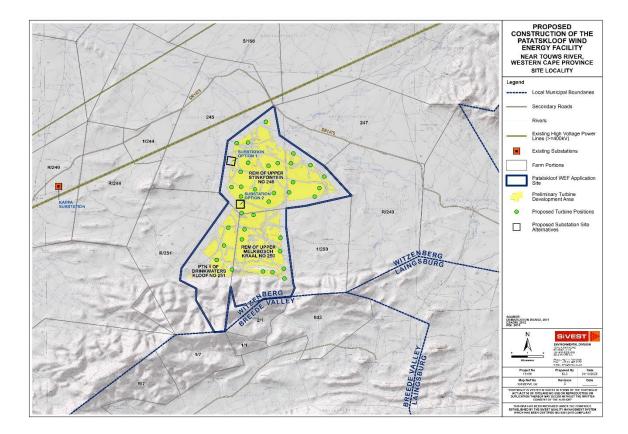


Figure 4: Preliminary Turbine layout and development area

2.3.2 Grid Components

The grid connection infrastructure proposals include two (2) substation site alternatives, each of which are 25 hectares in extent, and six (6) power line route alignment alternatives (**Figure 5**). These alternatives will be considered and assessed as part of the BA process and will be amended or refined to avoid identified environmental sensitivities.

All power line route alignments will be assessed within a 150m wide assessment corridor (75m on either side of power line). These alternatives are described below:

- Power Line Corridor Option 1 is approximately 16km in length, linking either Substation Option 1 or Substation Option 2 to Kappa Substation.
- Power Line Corridor Option 2 is approximately 24km in length, linking either Substation Option 1 or Substation Option 2 to Kappa Substation.
- Power Line Corridor Option 3 is approximately 8km in length, linking either Substation Option 1 or Substation Option 2 to Adamskraal Substation.
- Power Line Corridor Option 4 is approximately 25km in length, linking either Substation Option 1 or Substation Option 2 to Kappa Substation.
- Power Line Corridor Option 5 is approximately 24km in length, linking either Substation Option 1 or Substation Option 2 to Kappa Substation. It should be noted that the assessment corridor applied to a short section of this route alignment serving Substation Option 2 has been widened to 300m.

 Power Line Corridor Option 6 is approximately 8km in length, linking either Substation Option 1 or Substation Option 2 to Adamskraal Substation.

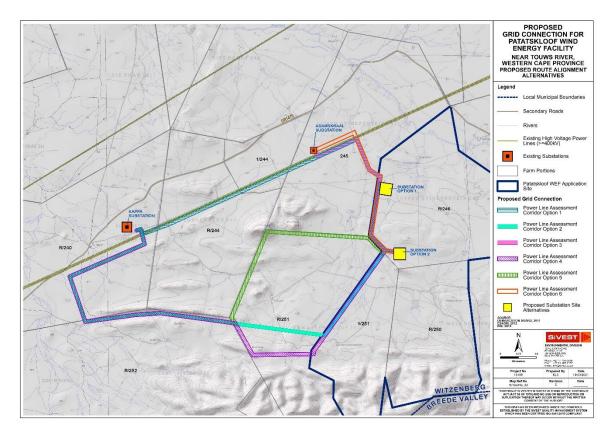


Figure 5: Proposed Substation and Power line options

2.3.3 No-go Alternative

The 'no-go' alternative is the option of not undertaking the proposed grid connection infrastructure projects. Hence, if the 'no-go' option is implemented, there would be no development. This alternative would result in no environmental impacts from the proposed project on the site or surrounding local area. It provides the baseline against which other alternatives are compared and will be considered throughout the report.

The 'no-go' option is a feasible option; however, this would prevent the proposed development from contributing to the environmental, social and economic benefits associated with the development of the renewable energy sector.

3. LEGAL REQUIREMENT AND GUIDELINES

The following is pertinent to this study:

- Section 24 of The Constitution of the Republic of South Africa;
- Agenda 21 Action plan for sustainable development of the Department of Environmental Affairs and Tourism (DEAT) 1998;
- National Environmental Management Act (NEMA), 1998 (Act No. 107 of 1998) inclusive of all amendments, as well as the NEM: Biodiversity Act;
- National Water Act, 1998 (Act No. 36 of 1998);
- Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983);
- Minerals and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002);
- Nature and Environmental Conservation Ordinance (No. 19 of 1974);
- National Forest Act (No. 84 of 1998); and
- National Heritage Resources Act (No. 25 of 1999) could apply if cultural use or heritage is linked to any natural resources

4. DESCRIPTION OF THE RECEIVING ENVIRONMENT

The site is dominated by three terrestrial vegetation types and one associated with the aquatic environment, spanning Karoo, Fynbos and Renosterveld habitat types. According to Mucina and Rutherford (2007 – amended 2018), the following vegetation units have been described for the site (Figure 6):

- 1. Tanqua Karoo SKv5
- 2. Majtiesfontein Quartzite Fynbos FFq3
- 3. Majtiesfontein Shake Renosterveld FRs6
- 4. Tanqua Wash Riviere (Azi 7)

As their naming implies, the spatial distribution of these is directly related to the underlying geology and soils, which are linked to the Dwyka/Ecca (Shales) and Witterberg (quartizitic sandstones) located under the areas where turbines are located. Based on the current turbine layout (Figure 6), most of the turbines are located within the Tanqua Karoo and Majtiesfontein Quartzite Fynbos vegetation units. The exception being the Tanqua Wash Riviere unit that is associated with sandy alluvial depositions associated with the Groot River floodplains. The latter is also an azonal vegetation type that is mostly dominated by saline vegetation.

None of these are listed as a Threatened Ecosystem as per the National Environmental Management Biodiversity Act, this is due to the vast area these vegetation units occupy, with little in terms of human / agricultural use.

Appendix 3 lists the typical species assemblages based on previous observations made within the region which include species records for both flora and fauna, housed in Global Biodiversity Information Facility (GBIF accessed December 2021). A potential 1571 species has been previously recorded in the Quarter

Degree Square grids that cover the site (3319bb & 3320aa), of which ca. 80% are plant species. The remainder, which excludes birds and bats as these are assessed separately, include the following taxa:

- Mammals 36 Species
- Reptiles 35 Species
- Amphibians 8 Species
- Fish 5 Species
- Insects 90 Species
- Spiders / Scorpions 5 Species
- Fungi 11 Species

This was then compared to observation made within a 4 day site-specific assessment conducted in November 2021, conducted after a period of significant winter rains, more than previous years, which some response by the flora, but the prolonged drought in the region has affected that growth of the plants, especially those in the low-lying plains areas, that have shallow soils. However, a clear delineation of the various terrestrial habitats within the site based the respective plant species composition as shown in Figure 7 could be defined.

Vegetation and flora

The species composition clearly followed a gradient from the higher lying areas in the south, will a marked reduction in plant species diversity and abundance in habitats observed in the northern parts of the study area, i.e. the shale dominated areas associated with the Tanqua Karoo vegetation unit was rather depauperate (Plate 1) when compared to both the Majtiesfontein vegetation units in the south (Plate 2).

Figure 7 therefore represents the finer scale mapping of the habitats/vegetation units found on site and could be summarised as follows:

1. Ruschia quartzites

Although plant species were spread widely within the site, the sandstone/quartzite dominated soils did show a high density of succulent species, mostly growing taller than the remaining species observed, especially when rocky areas were encountered. These areas were also dominated by various *Ruschia* species, in particular *R. spinosa*, accompanied by *Psilocaulon sp*, and *Pteronia pallens* specimens.

2. Tanqua karoo - Pteronia pallens / Zygophyllum shrubland

These areas were dominated taller shrubs *Zygophyllum retrofractum* and *Pteronia pallens*, the latter being an indicator of intense grazing pressure in the past (Plate 1).

3. Renosterveld & Fynbos

This vegetation unit was largely confirmed to inhabit the slopes of the south portion of the site, and due to the habitat complexity (slope/aspect and rock areas), the diversity and abundance of species was far higher than the lower lying areas of the site. Due to the diversity of this vegetation unit, as well as passed EnviroSci

experience in trying to rehabilitate such areas for other wind farms in the region, this vegetation unit should be excluded from the development footprint.

Note some of the species observed and listed below are also observed in the Fynbos dominated unit, indicating a slow transition between the two vegetation types, rather than a distinct boundary as indicated in the National Vegetation Map (Figure 6).

Species observed included:

Dicerothamnus rhinocerotis (L.f.) Koekemoer Aspalathus alpestris Asparagus capensis var. capensis Athanasia flexuosa Chrysocoma oblongifolia Eriocephalus ericoides subsp. ericoides Euryops cuneatus Oedera genistifolia Passerina truncata subsp. truncata Pteronia sordida Antimima dasyphylla Cotula macroglossa Rumex lanceolatus Ursinia nana Chlorophytum lewisiae Romulea tortuosa Trachyandra thyrsoidea Crassula lanceolata subsp. lanceolata Bromus pectinatus Ehrharta calycina Ehrharta capensis Hyparrhenia hirta Hypodiscus sulcatus Pentaschistis rigidissima Lotononis comptonii Hesperantha truncatula Romulea malaniae

4. Tanqua Wash Riviere (Azi 7)

This vegetation unit is associated with alluvial deposits found along the mainstem rivers associated with the Doring and Tankwa Rivers, which include the Groot River found within the study area. These areas also then contain the channels and floodplains that are then colonised by *Vachellia karroo*, *Salsola* and *Lycium* species as well as those species listed below. For the most part these areas are also considered saline, possibly due the higher mineral loads as leachate from surrounding shales, that are then accumulate in the alluvial sandy deposits when river flows do occur. The importance and status of the unit would be considered Very High in terms of sensitivity (see Section 5 below) and it is thus recommended that WTG 24 and Substation Option 1 be relocated outside of these areas. Similarly, the proposed Grid Options will all in some way impact on this vegetation unit, with most options also impacting on extended sections of Alluvial Wash systems as well. Section 6 deals with a comparison of the various corridor options.

This will also reduce the potential impacts on Fauna as discussed later below.

Vachellia karroo Galenia africana Lycium cinereum Salsola arborea Sarcocornia mossiana Moraea speciosa Tritonia florentiae Cladoraphis spinosa Stipagrostis obtusa

SiVEST Environmental Terrestrial Biodiversity Assessment Version No. 1 Euryops annuus Gazania lichtensteinii Osteospermum pinnatum Ursinia nana Limonium sp. nov. Salsola ceresica

Augea capensis

Salsola aphylla

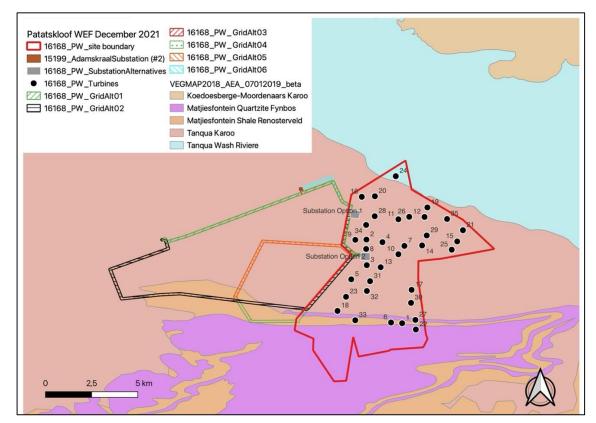


Figure 6: National Vegetation Map as per Mucina and Rutherford (2007) amended NBSA 2018

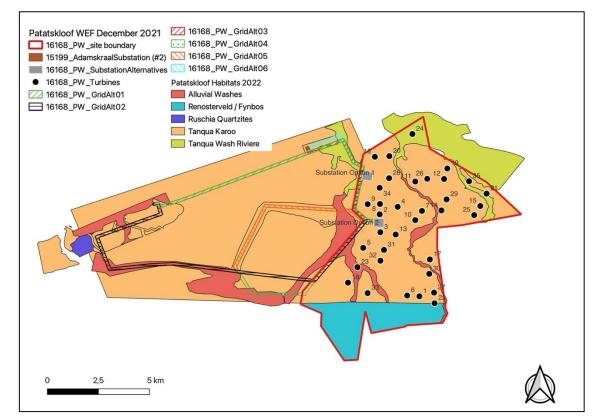


Figure 7: Spatial representation of the observed vegetation units at a finer scale, dominated by three terrestrial habitat units



Plate 1: A view from the central portion of the site, looking westwards, over the Tanqua Karoo vegetation unit that spans most of the site.



Plate 2: A ground view of the habitat transition within the site, dominated by the sparsely vegetated shale / quartzite plains in the western portion of the site near the grid connection but will be avoided by the proposed grid corridors

No rare or listed plant species were observed during the survey period within the proposed turbine positions; however, several species are protected in terms of the Western Cape legislation. The disturbance, destruction and/or relocation, whichever is more relevant, of these species would require the relevant permits from the provincial authority. it is highly recommended that a detailed walkdown of the final layout is conducted, during a suitable time of the year. This will result in a complete species list for the actual footprints and / or assist with any micrositing that may be required to avoid any important habitat, as the relocation of certain species during a search and rescue operation is not always successful, thus avoidance is found to be a better solution.

The DFFE Screening Tool lists the following species, which were actively searched for, but suitable habitat and or the presence / absence of this species was not confirmed. Most of these are associated with fynbos and or rocky outcrop environments, found outside of the development areas.

Globulariopsis wittebergensis Nenax elsieae Nenax velutina Ixia oxalidiflora Sensitive species 984 Sensitive species 607 Rhodocoma vleibergensis Hypodiscus sulcatus Restio esterhuyseniae Restio karooicus Anisodontea procumbens Eriocephalus microphyllus var. carnosus Agathosma acocksii Sensitive species 1199 Phylica retorta Phiambolia hallii Calobota elongata Asparagus mollis Protea convexa Erica glandulipila Sensitive species 142 Restio aridus Heliophila elata

Eriocephalus grandiflorus Octopoma nanum Leucadendron sp. nov. (Acocks 23716 NBG) Leucospermum catherinae Phylica retorta Sensitive species 651 Braunsia stayneri Drosanthemum worcesterense Leobordea globulosa Amphithalea spinosa Melolobium stipulatum Aspalathus intricata subsp. intricata Aspalathus intricata subsp. oxyclada Sensitive species 651 Braunsia stayneri Leobordea globulosa. I Phiambolia hallii Calobota elongata Asparagus mollis Sensitive species 275 Octopoma nanum

<u>Fauna</u>

As previously mentioned approximately 179 animal species have been previously observed within the two quarter degrees square areas associated with the study area. These are predominantly Mammal (20%), Reptile (19%) and Insect species (50%), which for the most part highly mobile and or habitat specific. These as listed in the Species Checklist created for the assessment (Appendix 3) were then searched for during the site visit. The only exception being the fish and amphibian species as no permanent or suitable habitat was observed within the study area, although habitats do occur downstream of the project area.

The DFFE screening tool results only include one important species (High & Medium Sensitivity), namely the Critically Endangered Riverine Rabbit (*Bunolagus monticularis*). Riverine rabbits are habitat-specific associated with dense patches of riverine bush along seasonal rivers similar to those found downstream of the site (Doring & Groot rivers). The Riverine rabbit is the only indigenous burrowing species in Africa, and thus requires deep, soft alluvial soils. It is therefore important that the Tanqua Was Riviere and 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. This will include, Substation Option and WTG 24 in particular. Roads should be kept to minimum these areas and any unavoidable crossings must be groundtruthed by the specialist. The Riverine Rabbit has been observed within a 15-20km radius of the site.

In terms of fauna the following are species which potentially occur at the site and are listed as protected species, with those species highlighted in BOLD being observed in this and past assessments:

Schedule 1: Specially Protected Fauna as per the Western Cape Nature Conservation Ordinance (No. 3 of 2000) that may occur within the region or have suitable habitat present

- Felis nigripes Black-footed cat/Miershooptier
- Felis silvestris African wild cat/Afrika wildekat
- Ictonyx striatus Striped polecat/Stinkmuishond
- Mellivora capensis Honey badger/Ratel
- Otocyon megalotis Bat-eared fox/Bakoorvos
- Proteles cristatus Aardwolf/Maanhaarjakkals
- Vulpes chama Cape fox / Silver jackal Silwervos
- Orycteropus afer Aardvark / Ant-bear Erdvark / Aardvark
- Atelerix frontalis South African hedgehog
- Family: Chamaeleonidae Chamaeleons, all species
- Family: Cordylidae Girdled lizards, all species

Virtually all indigenous fauna which do not fall under Schedule 1 are classified under Schedule 2, except those species classified as pests. In terms of mammals most rodents, shrews, elephant shrews, bats, hares and rabbits, carnivores such as mongoose, genets, and meerkat, antelope such as klipspringer, steenbok, Mountain reedbuck and duiker are included. In terms of other vertebrates, all tortoises, lizards, most harmless snakes and all frogs are listed under Schedule 2. The full list is contained within the Schedule and it not repeated here.

In terms of fauna, the following, inter alia, are protected and may not be hunted, captured or harmed without a permit:

- All tortoises [3 species observed which include Angulate tortoise (*Chersina angulate Plate 3*), Karoo Padloper (*Homopus femoralis*) & Southern Tent Tortoise (*Psammobates tentorius tentorius*)];
- All lizards;
- All frogs;
- Most snakes [4 species have been observed in the past on site, namely Cape cobra (*Naja nivea*),
 Mole snake (*Pseudoaspis cana*), Karoo sand snake (*Psammophylax rhombeatus rhombeatus*),
 and Puff adder (*Bitis arietans arietans Plate 4*);
- All indigenous antelope;
- Aardvark;
- Most small carnivores such as Honey Badger, Cape Fox, Bat-eared Fox;
- Large Grey Mongoose etc.; and

With the exception of the tortoises, lizards and snakes, the species listed above typically leave the area once construction commences, thus permits for the relocation of lizards, snakes and tortoises must be obtained.



Photo Plate 3: One of the many Angulate tortoises (*Chersina angulata*) observed on site that had succumbed to the previous drought conditions



Photo Plate 4: Another coming siting within the region, namely the Puffadder (*Bitis arietans arietans*), with two sited during the assessment on site

The provincial Biodiversity Spatial Plan Critical Biodiversity Area (CBA) spatial layers (Figure 8). Noting that the aquatic systems associated with the study area have been rated as Critical Biodiversity Areas Type 1, Ecological Support Areas (Type 1 & 2), associated with aquatic/riverine systems. <u>Turbines 5, 18. 20, 23, 24</u> and 31 are six such structures that are located within CBAs, and these should be considered for micrositing, to outside these areas (Figure 8), noting that currently all the other turbines are located outside any CBA and ESA areas. Substation option 1 is the only other structure (building) that is located with an CBA.

The DFFE screening tool indicated that several Very High sensitivity features were located within the study area. The presence of these Very High Sensitivity features was confirmed during this assessment (See Appendix 2 for Verification Statement), but also extended to include additional areas as delineated in Figure 9.

The study area is also not located within an International Bird Area (IBA) or a Strategic Water Resource Area and did not contain any wetland clusters or listed Threatened Ecosystems.

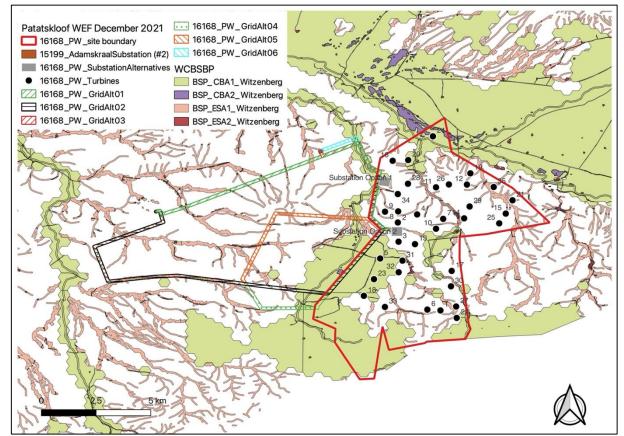


Figure 8: The Critical Biodiversity Areas as per the Western Cape Biodiversity Spatial Plan (2017)

5. SPECIALIST FINDINGS / IDENTIFICATION AND ASSESSMENT OF IMPACTS

Using the baseline description and field data while considering the current disturbances and site characteristics, the following features were identified, then categorized into one of number pre-determined sensitivity categories to provide protect and/or guide the layout planning and design processes of the corridor and a suitable alignment for the grid within. Sensitivity areas (with their buffers) were categorized as follows:

Very High = No Go	Legislated "no go" areas or setbacks and areas or features that are considered of such significance that impacting them may be regarded as fatal flaw or strongly influence the project impact significance profile
High	Areas or features that are considered to have a high sensitivity or where project infrastructure would be highly constrained and should be avoided as far as possible. Infrastructure located in these areas are likely to drive up impact significance ratings and mitigations
Medium	Buffer areas and or areas that are deemed to be of medium sensitivity
Low	Areas of low sensitivity or constraints
Neutral	Unconstrained areas (left blank in mapping)

Table 1 below provides an overview of the sensitivity of various features (with buffers distances where relevant) as it relates to the main project component types for the project. The features are shown spatially in Figures 9. The sensitivity ratings of No go, High, Medium and Low were determined through an assessment of the habitat sensitivity and related constraints. However, these No-Go areas relate in general terms to the project and there are areas where encroachment on these areas would occur (i.e., existing road crossings within Very High sensitivity areas) but this is only considered acceptable if these areas have already been impacted.

Developme nt Component	Waterbody type	body type Sensitivity rating of the respective waterbody type against the development type and the required buffer							
	Renosterveld / Fynbos	No-go							
WTG areas	Tanqua Wash Riviere & Alluvial washes	No-go							
	Shale plains, Tanqua Karoo and Ruschia Quartzites	Low – thus acceptable							
Hardstands	Renosterveld / Fynbos	No-go							
, Buildings / Substations	Tanqua Wash Riviere & Alluvial washes	No-go							
& BESS	Shale plains, Tanqua Karoo and Ruschia Quartzites	Low – thus acceptable							
	Renosterveld / Fynbos	No-go	LOW if an existing tracks /						
Roads	Tanqua Wash Riviere & Alluvial washes	No-go	road or impact is already present, that must then be included in the potential road network						
	Shale plains, Tanqua Karoo and Ruschia Quartzites	Low – thus acceptable							
	Renosterveld / Fynbos	Assumption is that the overhead lines could span these areas,							
Overhead Lines	Tanqua Wash Riviere & Alluvial washes	but the towers/pylons should adhere to the buffer distances as indicated where possible as some of the alluvial system are very							
Lines	Shale plains, Tanqua Karoo and Ruschia Quartzites	broad. This however may not be achievable for the majority of the proposed grid options – See Section 6 below.							

Table 1: Results of the sensitivity rating / constraints assessment

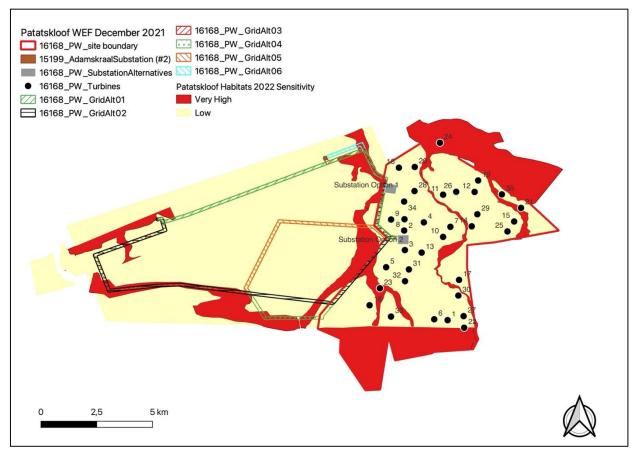


Figure 9: Habitat sensitivity map inclusive of terrestrial and aquatic habitats assessed

The following impacts were then assessed, which are aligned with those contained in the Biodiversity Assessment Protocols and included in the table below and assessed against the proposed alignment and potential activities:

Biodiversity Assessment Protocol Impacts found applicable to this project	Impacts assessed in this report below
Faunal and vegetation communities inhabiting the site	Impact 1, 2, 3 and 4
Fragmentation (physical loss of ecological connectivity and or CBA corridors)	Impact 1, 2, 3 and 4
Changes in numbers and density of species	Impact 1, 2, 3 and 4
No-Go Impact	Impact 5
Cumulative Impacts	Impact 6

As highlighted above, the following impacts on the environment have been identified and will be assessed in greater detail as follows, as well as separately the No-Go and Cumulative impacts:

Construction & Decommissioning Phases

- Impact 1: Loss of species of special concern
- Impact 2: Loss of terrestrial habitats flora and vegetation
- Impact 3: Loss of terrestrial species fauna

Operational phase

• Impact 4: Loss of terrestrial species - fauna

5.1 Construction & Decommissioning Phase

 Table 2: Rating of impacts for the construction and decommissioning phase

ENVIRONMENTAL PARAMETER	ISSUE / IMPACT /		EI	NVIF				SIGN		ANCE	RECOMMENDED	ENVIRONMENTAL SIGNIFICANCE AFTER MITIGATION										
	ENVIRONMENTAL EFFECT/ NATURE	Е	Р	R	L	D	 	TOTAL	STATU S':	S	MITIGATION MEASURES	Е	Р	R	L	D	 	TOTAL	STATU	S		
	The construction activities will result in the disturbance of both aquatic and terrestrial habitats that may contain										Develop and implement an Rehabilitation and Monitoring plan post Environmental Authorisation. This must be developed following the finalisation of the turbine / road layout and a walk down has been completed. This plan should include relocation of suitable plant species, but more important protect any topsoil stores and promote the collection of											
Impact 1: Loss of species of special concern	listed and or protected plant or animal species. However, none of these were observed during this assessment within the tower positions proposed	1	1	1	1	1	1	5	-	LOW (- ve)	Provide the conection of vegetative material and propagules / seed to assist with the revegetation of the siteWhere temporary construction lay-down or assembly areas should be sited on transformed areas; andRapid regeneration of plant cover must be encouraged by setting aside topsoil during earthmoving and replacing onto areas where the re-	1	1	1	1	1	1	5	-	LOW (- ve)		

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ENVIRONMENTAL	ISSUE / IMPACT /		El	NVIF				. Sigi Tiga		ANCE	RECOMMENDED		ENVIRONMENTAL SIGNIFICANCE AFTER MITIGATION										
PARAMETER	ENVIRONMENTAL EFFECT/ NATURE	Е	Р	R	L	D	 	TOTAL	STATU S.()	S	MITIGATION MEASURES	Е	Р	R	L	D	 / M	TOTAL	STATU s /.	S			
											establishment of plant cover is desirable to prevent erosion.												
Impact 2: Loss of terrestrial habitats – flora and vegetation	The construction of the proposed infrastructure will require the need to clear vegetation which could then have a secondary impact on ecological connectivity and especially Critical Biodiversity Areas, linked to the large riverine corridors.	2	3	2	2	3	2	24	-	MEDIUM (-ve)	A pre-construction walkthrough by the ecologist is recommended, who can assist with the development of the Rehabilitation and Monitoring plan, coupled to micro-siting of the final layout. All alien plant re-growth, which is currently low within the greater region must be monitored and should it occur, these plants must be eradicated within the project footprints. Where possible, temporary construction lay-down or assembly areas should be sited on transformed areas; and Rapid regeneration of plant cover must be encouraged by setting aside topsoil during earthmoving and replacing onto areas where the re- establishment of plant	1	3	2	1	2	2	18	-	LOW (- ve)			

ENVIRONMENTAL PARAMETER	ISSUE / IMPACT / ENVIRONMENTAL EFFECT/ NATURE		El	NVIF				TIGA [.]		ANCE	RECOMMENDED MITIGATION MEASURES	ENVIRONMENTAL SIGNIFICANCE AFTER MITIGATION								
		Е	Р	R	L	D	 / M	TOTAL	STATU S.()	S		Е	Р	R	L	D	 	TOTAL	STATU s /.	S
											cover is desirable to prevent erosion.									
Impact 3: Loss of terrestrial species - fauna	Although most of the species observed are mobile, the increase in vehicle movement could result in an increase in road mortalities.	2	3	2	2	3	2	24	-	MEDIUM (-ve)	Clear demarcation during the construction phase of all undisturbed sensitive areas that are not within the direct footprint of the REF to ensure that there is no uncontrolled access by construction vehicles and labourers; Educate contractors as to the importance of the undisturbed conservations areas and importance of avoiding them; All vehicles must stick to designated and prepared roads and adhere to the speed limit on site of 40km/hr; Mitigating the risk of poaching by fencing in the accommodation compounds of the construction crews, to prevent individuals from wandering in the veld after hours; banning the possession of dogs on site by construction and maintenance staff.	1	3	2	1	2	2	18		LOW (- ve)

5.2 Operation

Table 3: Rating of impacts for the operational phase

ENVIRONMENTAL	ISSUE / IMPACT /	ENVIRONMENTAL SIGNIFICANCE BEFORE MITIGATION								ANCE	ENVIRONMENTAL SIGNIFICANCERECOMMENDEDAFTER MITIGATION					NCE				
PARAMETER	ENVIRONMENTAL EFFECT/ NATURE	Е	Р	R	L	D	 	TOTAL	STATU	S	MITIGATION MEASURES	Е	Р	R	L	D	 	TOTAL	STATU	S
Operation Phase	Although most of the species observed are mobile, the increase in vehicle movement could result in an increase in road mortalities.	2	3	2	2	3	2	24	-	MEDIUM (-ve)	Clear demarcation during the construction phase of all undisturbed sensitive areas that are not within the direct footprint of the REF to ensure that there is no uncontrolled access by construction vehicles and labourers; Educate contractors as to the importance of the undisturbed conservations areas and importance of avoiding them; All vehicles must stick to designated and prepared roads and adhere to the speed limit on site of 40km/hr; Mitigating the risk of poaching by fencing in the accommodation compounds of the	1	3	2	1	2	2	18	-	LOW (- ve)

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ENVIRONMENTAL	ISSUE / IMPACT /		El		-			SIGN	-	ANCE	ENVIRONMENTAL SIGNIFICANCE RECOMMENDED AFTER MITIGATION					NCE				
PARAMETER EFFECT/ NATURE		Е	Ρ	R	L	D	І / М	TOTAL	STATU	S	MITIGATION MEASURES	Е	Р	R	L	D	 / M	TOTAL	STATU s i.	s
											construction crews, to prevent individuals from wandering in the veld after hours; banning the possession of dogs on site by construction and maintenance staff.									

5.3 No go Impact

Table 4: Rating of impacts (No-go)

ENVIRONMENTAL	ISSUE / IMPACT /	ENVIRONMENTAL SIGNIFICANCE BEFORE MITIGATION					ENVIRONMENTAL SIGNIFICANCE RECOMMENDED AFTER MITIGATION				ANCE									
PARAMETER	ENVIRONMENTAL EFFECT/ NATURE	Е	Ρ	R	L	D	І / М	тотаL	STATU s /.	s	MITIGATION MEASURES	Е	Р	R	L	D	 	TOTAL	STATU	S
No-Go																				
Impact on terrestrial resources should the project not go ahead (i.e. the No Go Alternative)	Should the project not proceed, then current status quo with regard the environment would remain unchanged. Overall, the area is largely in a natural state. But present day impacts do occur in localised areas and included the following: • Increase in unpalatable species due to past grazing activities	1	3	2	1	2	2	18	_	LOW (- ve)	Improve current grazing management, although this is occurring within the surrounding conservation areas and or areas that are used for any hunting / game farming Improve the current stormwater and energy dissipation features not currently found along the tracks and roads within the region	1	3	2	1	2	2	18	-	LOW (- ve)

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Erosion as a result of road crossings; • Several farm dams; and • Undersized culverts within present day road crossings.		Install properly sized culverts with erosion protection measures at the present road / track crossings			

5.4 Cumulative Impacts

A cumulative impact assessment was conducted by assessing this project in relation to any other proposed projects within a 35km radius, which included, Tooverberg, Perdekraal Projects, Witteberg and the various Komsberg Projects. The report author has been involved in the assessment of all the listed projects within the exception of the Touws River and Montagu Solar projects. However, all of the reports were based on the premise that all layouts were developed on the basis of impact avoidance, with particular reference to the avoidance of Very High Sensitivity areas. Consequently, all the impacts that remain could be mitigated mostly through revegetation and / or proper stormwater management. Thus all the impacts would be Medium to Low depending on the scale of the sites, but found acceptable.

Note that EnviroSci is also currently involved in Search & Rescue and or Revegetation auditing of several of the Komsberg Wind Farm Projects, which include the Roggeveld Wind Farm and the Brand Valley / Rietkloof WEFs.

Table 5: Rating of cumulative impacts

ENVIRONMENTAL	ISSUE / IMPACT / ENVIRONMENTAL			INVI	-			. Sign Tigat		-	RECOMMENDED MITIGATION	ENVIRONMENTAL SIGNIFICANCE AFTER MITIGATION								
PARAMETER	EFFECT/ NATURE	Е	Ρ	R	L	D	I/ M	тот	STA STA	S	MEASURES	E	Р	R	L	D	I/ M	TOT	STA TIIS	S
Cumulative Phase	9																			
Cumulative Impact of various proposed wind farms and associated grid lines on the natural environment	The cumulative assessment considers the various proposed renewable projects that occur within a 35km radius of this site, where							5	-	LOW (- ve)	The premise of all the reviewed or assessed projects has been the avoidance of impacts on the Very High Sensitivity environments, which have been		3	2		2	2	18	-	LOW (- ve)
	the author has either been involved in the assessment of these projects and or review of the past assessments as part of any required Water Use Licenses										achieved by the various proposed layouts. The only remaining impacts will be the crossing of internal roads over minor watercourse / drainage lines or areas rated as LOW sensitivity.									

5.5 Overall Impact Rating

Table 6: Overall Impact Significance for the WEF (Pre- and Post-Mitigation)

Nature of impact and Phase	Overall Impact Significance (Pre - Mitigation)	Proposed mitigation	Overall Impact Significance (Post - Mitigation)
Construction Phase			
Impact 1: Loss of species of special concern	Low	Develop and implement an Rehabilitation and Monitoring plan post Environmental Authorisation. This must be developed following the finalisation of the turbine / road layout and a walk down has been completed. This plan should include relocation of suitable plant species, but more important protect any topsoil stores and promote the collection of vegetative material and propagules / seed to assist with the revegetation of the site Where possible, temporary construction lay-down or assembly areas should be sited on transformed areas; and Rapid regeneration of plant cover must be encouraged by setting aside topsoil during earthmoving and replacing onto areas where the re- establishment of plant cover is desirable to prevent erosion.	Low
Impact 2: Loss of terrestrial habitats – flora and vegetation	Medium	A pre-construction walkthrough by the ecologist is recommended, who can assist with the development of the Rehabilitation and Monitoring plan, coupled to micro-siting of the final layout. All alien plant re-growth, which is currently low within the greater region must be monitored and should it occur, these plants must be eradicated within the project footprints. Where possible, temporary construction lay-down or assembly areas should be sited on transformed areas; and Rapid regeneration of plant cover must be encouraged by setting aside topsoil during earthmoving and replacing onto areas where the re- establishment of plant	Low

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		cover is desirable to prevent erosion.	
	Medium	Clear demarcation during the construction phase of all undisturbed sensitive areas that are not within the direct footprint of the REF to ensure that there is no uncontrolled access by construction vehicles and labourers;	Low
Impact 3: Loss of terrestrial species - fauna		Educate contractors as to the importance of the undisturbed conservations areas and importance of avoiding them;	
		All vehicles must stick to designated and prepared roads and adhere to the speed limit on site of 40km/hr;	
		Mitigating the risk of poaching by fencing in the accommodation compounds of the construction crews, to prevent individuals from wandering in the veld after hours; banning the possession of dogs on site by construction and	
Operation Phase		maintenance staff.	
Impact 4: Loss of terrestrial species - fauna	Medium	Clear demarcation during the construction phase of all undisturbed sensitive areas that are not within the direct footprint of the REF to ensure that there is no uncontrolled access by construction vehicles and labourers; Educate contractors as to the importance of the undisturbed conservations areas and	Low
		All vehicles must stick to designated and prepared roads and adhere to the speed limit on site of 40km/hr;	
		Mitigating the risk of poaching by fencing in the accommodation compounds of the construction crews, to prevent individuals from wandering in the veld after hours; banning the possession of dogs on site by construction and maintenance staff.	

No-Go	Low	Improve current grazing management, although this is occurring within the surrounding conservation areas and or areas that are used for any hunting / game farming Improve the current stormwater and energy dissipation features not currently found along the tracks and roads within the region Install properly sized culverts with erosion protection measures at the present road / track crossings	Low
Cumulative Impacts	Low	The premise of all the reviewed or assessed projects has been the avoidance of impacts on the Very High Sensitivity environments, which have been achieved by the various proposed layouts. The only remaining impacts will be the crossing of internal roads over minor watercourse / drainage lines or areas rated as LOW sensitivity.	Low

6. COMPARATIVE ASSESSMENT OF ALTERNATIVES

Key

PREFERRED	The alternative will result in a low impact / reduce the impact / result in a positive impact
FAVOURABLE	The impact will be relatively insignificant
LEAST PREFERRED	The alternative will result in a high impact / increase the impact
NO PREFERENCE	The alternative will result in equal impacts

Table 7: Comparative assessment of WEF components

Alternative	Preference	Reasons (incl. potential issues)
SUBSTAT	TION SITE ALTERN	IATIVES
Substation Option 1		With minor layout adjustment the water course can be avoided
Substation Option 2		With minor layout adjustment the water course can be avoided

6.1 Grid components

Table 8: Comparative assessment of Grid components

Alternative	Preference	Reasons (incl. potential issues)
GF	RID ALTERNATIVE	S
Option 1	Can span all sensitive systems	
Option 2 Option 3 Option 4 Option 5	These lines follow or cross several very high sensitivity areas, and these options should be avoided	OHL towers should be placed outside of delineated aquatic systems, with assumption that the associated substations are moved (See Table 7 above), and assuming no tracks are created within the no-go areas
Option 6	Can span all sensitive systems	

6.2 No-Go Alternative

Should the project not proceed, then current status quo with regard the aquatic environment would remain unchanged. Overall, these catchment and subsequent rivers / watercourses are largely in a natural state. Present day impacts do occur in localised areas and included the following:

- Erosion as a result of road crossings;
- Several farm dams; and
- Undersized culverts within present day road crossings, although very few occur on site

Land owners should undertake the following:

- Improve grazing management practices
- Improve the current stormwater and energy dissipation features not currently found along some of the tracks and roads within the region
- Install properly sized culverts or drifts with erosion protection measures at the present road / track crossings

6.3 No-Go Alternative

Should the project not proceed, then current status quo with regard the aquatic environment would remain unchanged.

Land owners should undertake the following:

- Improve grazing management practices
- Improve the current stormwater and energy dissipation features not currently found along some of the tracks and roads within the region
- Install properly sized culverts or drifts with erosion protection measures at the present road / track crossings

7. CONCLUSION AND SUMMARY

7.1 Summary of Findings

The project overall has a small footprint spread out over a large area, allowing for retention of much of the natural environment so that the systems should remain largely unaffected. Therefore, the wind farm is such that it carries a low intensity impact, but requiring the clearing of areas with terrestrial vegetation, especially when considering the associated roads, cables and other infrastructure.

A variety of environmental features were observed within the study area and these were mapped and buffered as necessary for their protection. The current layout has the potential, to a large degree, avoided these sensitive features and buffer areas, greatly reducing the potential overall impact and environmental risk. The overall and cumulative impacts, as assessed, are linked to instances where complete avoidance was not possible, or the nature of the activities involve a potential risk to aquatic resources even at great distance.

Overall, it is expected that the impact on the environment would be Low (-). Noteworthy areas, that should be avoided, include the Very High Sensitivity areas as shown in this report.

7.2 Conclusion and Impact Statement

Based on the findings of this study, the specialist finds no reason to withhold to an authorisation of any of the proposed activities, assuming that key mitigations measures are implemented and provided, that all the Very High sensitivity systems could be avoided, while making use of existing tracks.

In conclusion, the results of this assessment, the aquatic study and various other constraints determinations, a final Buildable Area (Go – Area) was developed in October 2022, as shown in Figure 15 below. This was then compared to the various sensitivities of the habitats observed and found to have taken cognizance of these, i.e. the buildable areas will impact on Low sensitivity area, thus resulting in Low impact ratings as discussed in this assessment.

Going forward, the turbine, roads and ancillary structures should thus take this into account, while it is also noted that the buildable areas are not contiguous and would have to cross some sensitive areas in particular access roads, cables and overhead lines. Therefore, any mitigations around route selections mentioned in this report must be considered (e.g., use existing tracks) and must be considered in the walkdown surveys post authorisation.

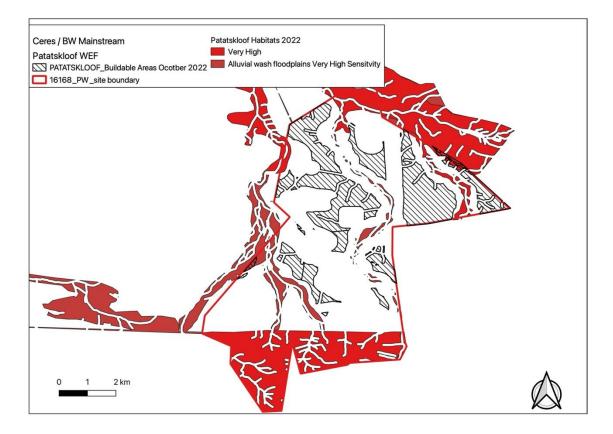


Figure 15: Final buildable area developed after consideration of the constraints layers produced during this and other studies in the EIA

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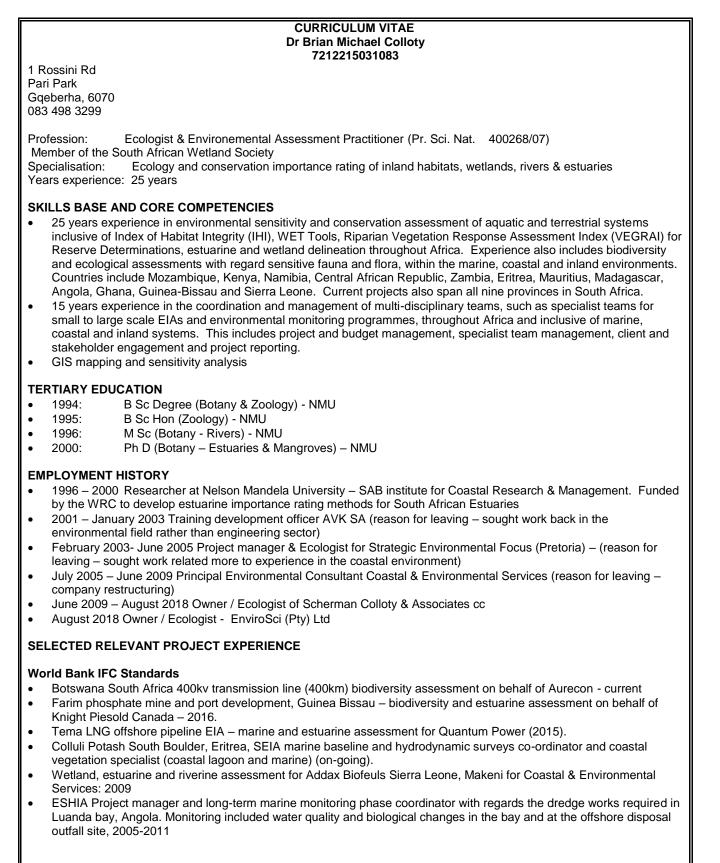
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Appendix 1 Specialist CV



South African

- Plant and animal search and rescue for the Karusa and Soetwater Wind Farms on behalf of Enel Green Power, Current
- Plant and animal search and rescue for the Nxuba, Oyster Bay and Garob Wind Farms on behalf of Enel Green Power, 2018 - 2019
- Plant and Animal Search and Rescue for the Port of Ngqura, Transnet Landside infrastructure Project, with development and management of on site nursery, Current
- Plant and Animal Search and Rescue for the Port of Ngqura, OTGC Tank Farm Project (2019)
- Plant search and rescue, for NMBM (Driftsands sewer, Glen Hurd Drive), Department of Social Development (Military veterans housing, Despatch) and Nxuba Wind Farm, current
- Wetland specialist appointed to update the Eastern Cape Biodiversity Conservation Plan, for the Province on behalf of EOH CES appointment by SANBI – current. This includes updating the National Wetland Inventory for the province, submitting the new data to CSIR/SANBI.
- CDC IDZ Alien eradication plans for three renewable projects Coega Wind Farm, Sonop Wind Farm and Coega PV, on behalf of JG Afrika (2016 2017).
- Nelson Mandela Bay Municipality Baakens River Integrated Wetland Assessment (Inclusive of Rehabilitation and Monitoring Plans) for CEN IEM Unit - Current
- Rangers Biomass Gasification Project (Uitenhage), biodiversity and wetland assessment and wetland rehabilitation / monitoring plans for CEM IEM Unit – 2017
- Gibson Bay Wind Farm implementation of the wetland management plan during the construction and operation of the wind farm (includes surface / groundwater as well wetland rehabilitation & monitoring plan) on behalf of Enel Green Power - 2018
- Gibson Bay Wind Farm 133kV Transmission Line wetland management plan during the construction of the transmission line (includes wetland rehabilitation & monitoring plan) on behalf of Eskom 2016.
- Tsitsikamma Community Wind Farm implementation of the wetland management plan during the construction of the wind farm (includes surface / biomonitoring, as well wetland rehabilitation & monitoring plan) on behalf of Cennergi – completed May 2016.
- Alicedale bulk sewer pipeline for Cacadu District, wetland and water quality assessment, 2016
- Mogalakwena 33kv transmission line in the Limpopo Province, on behlaf of Aurecon, 2016
- Cape St Francis WWTW expansion wetland and passive treatment system for the Kouga Municipality, 2015
- Macindane bulk water and sewer pipelines wetland and wetland rehabilitation plan 2015
- Eskom Prieska to Copperton 132kV transmission line aquatic assessment, Northern Cape on behalf of Savannah Environmental 2015.
- Joe Slovo sewer pipeline upgrade wetland assessment for Nelson Mandela Bay Municipality 2014
- Cape Recife Waste Water Treatment Works expansion and pipeline aquatic assessment for Nelson Mandela Bay Municipality 2013
- Pola park bulk sewer line upgrade aquatic assessment for Nelson Mandela Bay Municipality 2013
- Transnet Freight Rail Swazi Rail Link (Current) wetland and ecological assessment on behalf of Aurecon for the proposed rail upgrade from Ermelo to Richards Bay
- Eskom Transmission wetland and ecological assessment for the proposed transmission line between Pietermaritzburg and Richards Bay on behalf of Aurecon (2012).
- Port Durnford Exarro Sands biodiversity assessment for the proposed mineral sands mine on behalf of Exxaro (2009)
- Fairbreeze Mine Exxaro (Mtunzini) wetland assessment on behalf of Strategic Environmental Services (2007).
- Wetland assessment for Richards Bay Minerals (2013) Zulti North haul road on behalf of RBM.
- Biodiversity and aquatic assessments for 118 renewable projects in the past 9 years in the Western, Eastern, Northern Cape, KwaZulu-Natal and Free State provinces. Clients included RES-SA, Red Cap, ACED Renewables, Mainstream Renewable, GDF Suez, Globeleq, ENEL, Abengoa amongst others. Particular aquatic sensitivity assessment and Water Use License Applications on behalf of Mainstream Renewable Energy (8 wind farms and 3 PV facilities.), Cennergi / Exxaro (2 Wind farms), WKN Wind current (2 wind farms & 2 PV facilities), ACED (6 wind farms) and Windlab (3 Wind farms) were also conducted. Several of these projects also required the assessment of the proposed transmission lines and switching stations, which were conducted on behalf of Eskom.
- Vegetation assessments on the Great Brak rivers for Department of Water and Sanitation, 2006 and the Gouritz Water Management Area (2014)
- Proposed FibreCo fibre optic cable vegetation assessment along the PE to George, George to Graaf Reinet, PE to Colesburg, and East London to Bloemfontein on behalf of SRK (2013-2015).

Appendix 2 – Site Verification Report

SITE SENSITIVITY VERIFICATION (IN TERMS OF PART A OF THE ASSESSMENT PROTOCOLS PUBLISHED IN GN 320 ON 20 MARCH 2020

INTRODUCTION

In accordance with Appendix 6 of the National Environmental Management Act (Act 107 of 1998, as amended) (NEMA) Environmental Impact Assessment (EIA) Regulations of 2014, a site sensitivity verification has been undertaken in order to confirm the current land use and environmental sensitivity of the proposed project area as identified by the National Web-Based Environmental Screening Tool (Screening Tool).

SITE SENSITIVITY VERIFICATION

Using the result of the specialist ecological impact assessment, that made use of past and current spatial databases, aerial images and field work conducted within and adjacent to the site over a number of years / seasons, various habitats were delineated and the rated in terms of their sensitivity.

OUTCOME OF SITE SENSITIVITY VERIFICATION

Similar to the results of the Screening Tool, the study area contained three types of sensitivity, namely Very High Medium and Low (Figure 1-3). However, the extent of the Very High Sensitivity areas was found be greater in extent as shown in Figure 4.

NATIONAL ENVIRONMENTAL SCREENING TOOL

Based on the DFFE Screening Tool, the site contains areas of very high sensitivity due to the presence of CBAs, Ecological Support Areas, NFEPAs and rivers. The remaining area within the development footprint is deemed to be of Medium (Animals) or Low sensitivity (Figure 1-3).

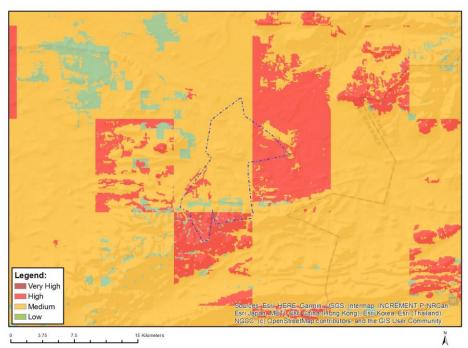


Figure 1. DFFE Screening Tool outcome for the animal biodiversity theme

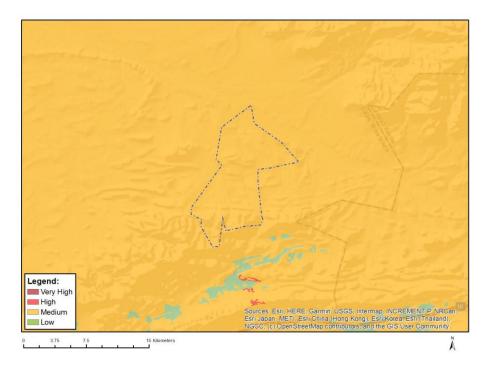


Figure 2. DFFE Screening Tool outcome for the Plant biodiversity theme

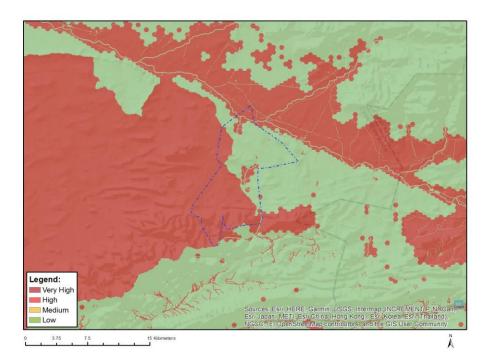


Figure 3. DFFE Screening Tool outcome for the Terrestrial biodiversity theme

Figure 4 below shows the sensitivity map produced following the ecological assessment as well as a ground-truthing exercises, with mapping of the observed features at a finer scale.

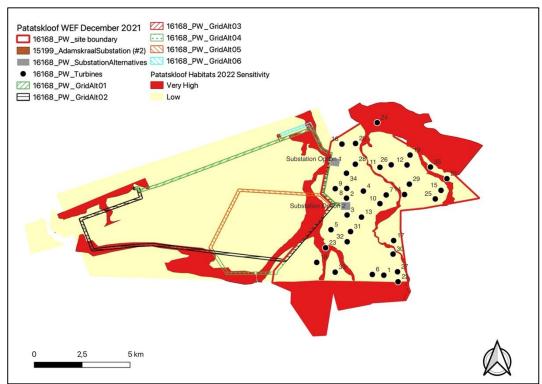


Figure 4. Environmental sensitivity map produced by the aquatic specialist

CONCLUSION

In conclusion, the DFFE Screening Tool identified three sensitivity ratings within the development study area, very high, medium and low. Although there is some overlap with the findings on site and the Screening Tool's outcome, the extent of the Very High sensitivity areas was found to be greater than the extent in the Screening Tool.

However and appropriate layout can be developed to minimise the impact on the Very High areas, but must be verified once the final layout inclusive of roads has been developed.

Appendix 3 – Species checklists

#	Family	Scientific name	Common name	Red list Category	Last recorded
AMPHIBIANS					
1	Pyxicephalidae	Amietia fuscigula	Cape River Frog	Least Concern (2017)	2012/03/02
2	Pyxicephalidae	Strongylopus grayii	Clicking Stream Frog	Least Concern	2000/05/01
REPTILES					
1	Agamidae	Agama atra	Southern Rock Agama	Least Concern (SARCA 2014)	1986/06/15
2	Agamidae	Agama hispida	Spiny Ground Agama	Least Concern (SARCA 2014)	1999/09/14
3	Chamaeleonida e	Bradypodion gutturale	Little Karoo Dwarf Chameleon	Least Concern (SARCA 2014)	1900/06/15
4	Colubridae	Dipsina multimaculata	Dwarf Beaked Snake	Least Concern (SARCA 2014)	1900/06/15
5	Cordylidae	Cordylus cordylus	Cape Girdled Lizard	Least Concern (SARCA 2014)	1900/06/15
6	Cordylidae	Karusasaurus polyzonus	Karoo Girdled Lizard	Least Concern (SARCA 2014)	1981/06/15
	•		Bibron's Gecko	Least Concern (SARCA	
7	Gekkonidae Gekkonidae	Chondrodactylus bibronii		2014) Not listed (2017-09-26)	1999/09/14 1900/06/15
		Goggia incognita	Southern Striped Pygmy Gecko	Least Concern (SARCA	
9	Gekkonidae	Pachydactylus capensis	Cape Gecko	2014) Least Concern (SARCA	2014/07/05
10	Gekkonidae	Pachydactylus formosus	Southern Rough Gecko	2014) Least Concern (SARCA	1981/06/15
11	Gekkonidae	Pachydactylus weberi	Weber's Gecko	2014) Least Concern (SARCA	1900/06/15
12	Gerrhosauridae	Tetradactylus tetradactylus	Cape Long-tailed Seps	2014) Least Concern (SARCA	1900/06/15
13	Lacertidae	Meroles knoxii	Knox's Desert Lizard	2014) Least Concern (SARCA	1900/06/15
14	Lacertidae	Pedioplanis laticeps Pedioplanis lineoocellata	Karoo Sand Lizard	2014) Least Concern (SARCA	2018/08/18
15	Lacertidae	pulchella	Common Sand Lizard	2014) Least Concern (SARCA	1999/09/14
16	Lamprophiidae	Psammophylax rhombeatus	Spotted Grass Snake	2014) Least Concern (SARCA	1900/06/15
17	Leptotyphlopid ae	Namibiana gracilior	Slender Thread Snake	2014)	1900/06/15
18	Scincidae	Acontias lineatus	Striped Dwarf Legless Skink	Least Concern (SARCA 2014)	2019/05/02
19	Scincidae	Trachylepis sulcata sulcata	Western Rock Skink	Least Concern (SARCA 2014)	2006/08/05
20	Scincidae	Trachylepis variegata	Variegated Skink	Least Concern (SARCA 2014)	1900/06/15
21	Testudinidae	Chersina angulata	Angulate Tortoise	Least Concern (SARCA 2014)	2013/01/01
22	Testudinidae	Chersobius boulengeri	Karoo Padloper	Near Threatened (SARCA 2014)	1900/06/15
23	Testudinidae	Psammobates tentorius subsp. ?	Tent Tortoise (subsp. ?)	Least Concern (SARCA 2014)	1900/06/15
24	Testudinidae	Psammobates tentorius tentorius	Karoo Tent Tortoise	,	2019/11/11
25	Testudinidae	Psammobates tentorius verroxii	Verrox's Tent Tortoise		2015/09/28
MAMMALS		- · · ·			
1	Bathyergidae	Georychus capensis	Cape Mole-rat	Least Concern (2016)	1954/06/10
2	Bovidae	Antidorcas marsupialis	Springbok	Least Concern (2016)	2021/07/06
3	Bovidae	Oryx gazella	Gemsbok	Least Concern (2016)	2017/03/23
4	Bovidae	Raphicerus campestris	Steenbok	Least Concern (2016)	2013/05/09
5	Bovidae	Sylvicapra grimmia	Bush Duiker	Least Concern (2016)	2014/07/05
6	Bovidae	Taurotragus oryx	Common Eland	Least Concern (2016)	2017/03/22
7	Canidae	Otocyon megalotis	Bat-eared Fox	Least Concern (2016)	1979/01/13
8	Felidae	Caracal caracal	Caracal	Least Concern (2016)	1980/03/25
9	Felidae	Felis silvestris	Wildcat	Least Concern (2016)	

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10	Herpestidae	Cynictis penicillata	Yellow Mongoose	Least Concern (2016)	
11	Leporidae Macroscelidida	Lepus sp.	Hares		2012/05/14
12	e	Elephantulus edwardii	Cape Elephant Shrew	Least Concern (2016)	1929/12/07
13	Molossidae	Tadarida aegyptiaca	Egyptian Free-tailed Bat	Least Concern (2016)	
14	Muridae	Gerbilliscus afra	Cape Gerbil	Least Concern (2016)	1929/06/28
15	Muridae	Mus (Nannomys) minutoides	Southern African Pygmy Mouse	Least Concern	1929/12/07
16	Muridae	Otomys irroratus	Southern African Vlei Rat (Fynbos type)	Least Concern (2016)	1954/03/02
17	Muridae	Otomys unisulcatus	Karoo Bush Rat	Least Concern (2016)	1980/01/01
18	Muridae	Parotomys brantsii	Brants's Whistling Rat	Least Concern (2016)	1980/01/01
19	Muridae	Rhabdomys pumilio	Xeric Four-striped Grass Rat	Least Concern (2016)	1954/04/02
20	Nesomyidae	Petromyscus collinus	Pygmy Rock Mouse	Least Concern (2016)	1980/01/01
21	Soricidae	Suncus varilla	Lesser Dwarf Shrew	Least Concern (2016)	1929/08/07

ODONATA

1	Aeshnidae	Anax imperator	Blue Emperor	LC	2017/03/23
2	Coenagrionida e	Ischnura senegalensis	Tropical Bluetail	LC	2017/03/23
3	Libellulidae	Crocothemis sanguinolenta	Little Scarlet	LC	2015/12/17
4	Libellulidae	Orthetrum capicola	Cape Skimmer	LC	2015/12/17
5	Libellulidae	Palpopleura deceptor	Deceptive Widow	LC	2017/03/23
6	Libellulidae	Pantala flavescens	Wandering Glider	LC	2017/03/23
7	Libellulidae	Sympetrum fonscolombii	Red-veined Darter or Nomad	LC	2017/03/23
8	Libellulidae	Tramea limbata	Ferruginous Glider	LC	2017/03/23

ARACHNIDA

1 BUTHIDAE Uroplectes carinatus			
	1	BUTHIDAE	Uroplectes carinatus

LEPIDOPTER A

1	EREBIDAE	Grammodes stolida			2017/03/23
2	EREBIDAE	Utetheisa pulchella		(0.000)	2017/03/23
3	HESPERIIDAE	Spialia spio	Mountain sandman	Least Concern (SABCA 2013) Least Concern (SABCA	2009/08/30
4	LYCAENIDAE	Crudaria capensis	Cape grey	2013) Least Concern (SABCA	1994/11/18
5	LYCAENIDAE	Leptomyrina lara	Cape black-eye	2013) Least Concern (SABCA	2019/05/30
6	LYCAENIDAE NYMPHALIDA	Thestor protumnus aridus	Boland skolly	2013) Least Concern (SABCA	1993/09/18
7	E NYMPHALIDA	Stygionympha irrorata	Karoo hillside brown	2013) Least Concern (SABCA	2004/04/13
8	E NYMPHALIDA	Torynesis mintha mintha	Mintha veined widow	2013) Least Concern (SABCA	2004/04/13
9	E	Vanessa cardui	Painted lady	2013) Least Concern (SABCA	2017/03/23
10	PIERIDAE	Pontia helice helice	Southern meadow white	2013)	1924/11/21

2015/02/15