

UMMBILA EMOYENI ELECTRICAL GRID INFRASTRUCTURE

Mpumalanga Province

Environmental Impact Assessment Report

October 2022

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PROJECT DETAILS

DFFE Ref No.:	:	14/12/16/3/3/2/2162
Title	:	Environmental Impact Assessment Process: Environmental Impact Assessment for the Umbila Emoyeni Electrical Grid Infrastructure, Mpumalanga Province
Authors	:	Savannah Environmental (Pty) Ltd Chantelle Geyer Jo-Anne Thomas
Client	:	Emoyeni Renewable Energy Farm (Pty) Ltd
Report Revision	:	Draft for Public Review
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When used as a reference this report should be cited as: Savannah Environmental (2022) EIA Report for the Umbila Emoyeni Electrical Grid Infrastructure, Mpumalanga Province.

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PURPOSE OF THE EIA REPORT AND INVITATION TO COMMENT

Emoyeni Renewable Energy Farm (Pty) Ltd has appointed Savannah Environmental as the independent environmental consultant to undertake the Scoping and Environmental Impact Assessment (S&EIA) process for the Umbila Emoyeni Electrical Grid Infrastructure (EGI), Mpumalanga Province. The EIA process is being undertaken in accordance with the requirements of the 2014 EIA Regulations promulgated in terms of the National Environmental Management Act (No. 107 of 1998) (NEMA).

This EIA Report consists of eleven chapters, as follows:

- » **Chapter 1** provides background to the Umbila Emoyeni EGI and the EIA process.
- » **Chapter 2** provides a description of the Umbila Emoyeni EGI.
- » **Chapter 3** provides the site selection information and identified project alternatives.
- » **Chapter 4** outlines the strategic regulatory and legal context for energy planning in South Africa, and specifically for the proposed Umbila Emoyeni EGI.
- » **Chapter 5** describes the need and desirability of the Umbila Emoyeni EGI within the project site.
- » **Chapter 6** outlines the process which was followed during the EIA process.
- » **Chapter 7** describes the existing biophysical and socio-economic environment affected by the proposed Umbila Emoyeni EGI.
- » **Chapter 8** provides a description and assessment of the potential impacts associated with the proposed Umbila Emoyeni EGI.
- » **Chapter 9** provides a description and assessment of the potential cumulative impacts associated with the proposed Umbila Emoyeni EGI.
- » **Chapter 10** presents the conclusions and recommendations based on the findings of the EIA for the Umbila Emoyeni EGI.
- » **Chapter 11** provides references used in the compilation of the EIA Report.

The EIA Report is available for review from **Friday, 14 October 2022 – Monday, 14 November 2022** on the Savannah Environmental website (<https://savannahsa.com/public-documents/grid-infrastructure/umbila-emoyeni-renewable-energy/>)

Please submit your comments by **14 November 2022** to:

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Comments can be made as written submission via fax, post or email.

EXECUTIVE SUMMARY

Emoyeni Renewable Energy Farm (Pty) Ltd is proposing the development of Electrical Grid Infrastructure (EGI) to support the Umbila Emoyeni Renewable Energy Farm (which will comprise a 666MW Wind Energy Facility and a 150MW Solar Energy Facility), which aims to export energy to the national electricity grid. The project (hereafter also referred to as 'Umbila Emoyeni EGI') is located ~6km south-east of Bethal and 1km east of Morgenzon, within the Mpumalanga Province. The project site is located across the Govan Mbeki, Lekwa, and Msukaligwa Local Municipalities within the Gert Sibande District (refer to **Figure 1**).

Each renewable energy facility will be constructed as a separate stand-alone project and therefore, separate Scoping and Environmental Impact Assessment (S&EIA) processes will be undertaken for each of the renewable energy facilities. Similarly, the grid connection solution will be subjected to a separate S&EIA process.

A technically feasible project site¹, with an extent of ~27 819ha has been identified by Emoyeni Renewable Energy Farm (Pty) Ltd as a technically suitable area for the development of the Umbila Emoyeni EGI. A development area² will be identified within the project site by the proponent for the development based on the outcome of the specialist assessments and technical considerations. The project site comprises numerous properties as listed in **Table 1** below.

Table 1: Detailed description of the Umbila Emoyeni Solar Energy Facility project site

Province	Mpumalanga Province	
District Municipality	Gert Sibande District Municipality	
Local Municipality	Govan Mbeki and Lekwa Local Municipalities	
Ward Number (s)	Ward 15 of the Govan Mbeki Local Municipality Ward 12 of the Lekwa Local Municipality	
Nearest town(s)	Richmond (~35km south-west) and Victoria West (~80km south-east)	
Affected Properties:	Parent Farm Number	Farm Portions
	Farm 261 – Naudesfontein	15 R/E, 21
	Farm 264 – Geluksplaats	0, 1, 3, 4, 5, 6 R/E, 8 R/E, 9R/E, 10, 11, 12
	Farm 268 – Brak Fontein Settlement	6,7,10,11,12
	Farm 420 – Rietfontein	8,9,10,11,12,15 R/E,16,18,19,22,32
	Farm 421 - Sukkelaar	2, 2, 7, 9, 9 10, 10 11, 11 12, 12, 22, 25 R/E, 34, 35, 36, 37, 37, 38, 39, 40, 42, 42
	Farm 422 – Klipfontein	0, 2 R/E, 3 R/E, 4, 5, 6, 7, 8 R/E, 9, 10, 12, 13 R/E, 14 R/E, 16, 17, 18, 19, 20, 21, 22, 23
	Farm 423 – Bekkerust	0 R/E, 1, 2 R/E, 4, 5 R/E, 6, 10, 11, 12, 13, 14, 15, 17, 19 R/E, 20, 22, 23, 24,25
	Farm 454 – Oshoek	4 R/E, 13, 18
	Farm 455 – Ebenhaezer	0, 1, 2, 3
	Farm 456 – Vaalbank	1, 2, 3, 4, 7, 8, 13, 15, 16, 17, 18, 19
Farm 457 – Roodekrans	0, 1, 4, 5, 7, 22, 23, 23	

¹ The project site is the area with an extent of 27 819ha, within which the Umbila Emoyeni EGI development footprint will be located.
² The development area is that identified area (located within the project site) where the Umbila Emoyeni EGI is planned to be located. The development area is still to be determined.

Farm 458 – Goedgedacht	0, 2, 3, 4, 4, 5, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 21, 21, 22, 23, 25, 26 R/E, 27, 28, 29, 31, 32, 33, 34, 35, 36, 37, 39, 41, 42, 43
Farm 467 – Twee Fontein	0 R/E, 1 R/E, 4 R/E, 5, 6, 7 R/E, 8, 10
Farm 469 – Klipkraal	5 R/E, 6, 7, 8
Farm 548 – Durabel	0
Farm 470 – Dorpsplaats	85
Farm 451 - Drinkwater	4, 22
Farm 452 - Brakfontein	5

The full extent of the project site has been considered within the EIA process with the aim of determining the suitability from an environmental and social perspective and identifying areas that should be avoided in development planning. Within this identified project site, a development area and development footprints for the substations and corridors for the power lines have been defined for assessment. The project site is larger than the area required for the development of the EGI and therefore provides the opportunity for the optimal placement of infrastructure, ensuring avoidance of major identified environmental sensitivities or constraints identified through this EIA process.

The proposed 666MW wind farm, 150MW of solar energy facility, and associated grid connection solution are collectively referred to as the Umbila Emoyeni Renewable Energy Farm. The renewable energy facilities which the Umbila Emoyeni EGI will support will be constructed as a separate stand-alone project and therefore, separate Scoping and Environmental Impact Assessment (S&EIA) processes will be undertaken for each facility. The scope of this Scoping Report is solely focused on the Umbila Emoyeni EGI and is considered to be the grid connection solution for the proposed renewable energy facilities.

The Umbila Emoyeni Renewable Energy Farm is proposed in response to the identified objectives of national and provincial government and local and district municipalities to develop renewable energy facilities for power generation purposes. It is the developer's intention to bid the renewable energy facilities under the Department of Mineral Resources and Energy's (DMRE's) Renewable Energy Independent Power Producer Procurement (REIPPP) Programme or a similar programme, with the aim of evacuating the generated power into the national grid. This will aid in the diversification and stabilisation of the country's electricity supply, in line with the objectives of the Integrated Resource Plan (IRP), with the Umbila Emoyeni Renewable Energy Farm set to inject up to 816MW of electricity into the national grid (wind and solar generation). Similarly, the location of the new generation in the Mpumalanga Province is important in the context of the Just Energy Transition (JET). The Umbila Emoyeni Projects will provide valuable jobs and socio-economic benefits that are required in an area where coal fired generation will be phased out over the next 10 years. This will be vitally important if the JET is to be successfully implemented and is a transition for everyone

The grid connection infrastructure will include:

- » A new 400/132 kV Main Transmission Substation (MTS), to be located adjacent to the Camden SOL Overhead Lines (OHLs).
- » New collector stations: each will comprise several incoming 132 kV lines from each project switching station, feeder bays, 132kV bus bars and outgoing line to the MTS.
- » Two 400kV loop-in loop-out OHLs to the existing Camden-Sol 400kV transmission line.
- » On-site switching stations (132kV in capacity) at each renewable energy facility.

- » 132kV power lines from the switching stations to the collector substations and ultimately to a new MTS.
- » On-site IPP substations where the generated power will be transformed from 33 kV to 132 kV so that it can be evacuated to Collector station and MTS
- » Access roads up to 8m wide.

1. Environmental Permitting Requirements

The Umbila Emoyeni EGI and its associated infrastructure trigger the need for the following environmental permit:

- » **An Environmental Authorisation (EA)** from the National Department of Forestry, Fisheries, and the Environment (DFFE), in consultation with the Provincial Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (DARDL&EA)), in accordance with the requirements of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and Environmental Impact Assessment (EIA) Regulations (GNR 326), 2014, as amended.

Savannah Environmental has been appointed as the Independent Environmental Assessment Practitioner (EAP) in accordance with NEMA and Regulations 21 to 24 of the 2014 EIA Regulations (GNR 326) to undertake the required S&EIA in support of the application for Environmental Authorisation (EA) and the public participation process for the project, in order to identify and assess all potential environmental impacts associated with the proposed EGI and recommend appropriate mitigation measures in an Environmental Management Programme (EMPr).

An EIA is an effective planning and decision-making tool for the project developer as it allows for the identification and management of potential environmental impacts. It provides the opportunity for the developer to be fore warned of potential environmental issues and allows for the resolution of issues reported on in the Scoping and EIA Reports as well as a dialogue with Interested and Affected Parties (I&APs). Comprehensive, independent environmental specialist studies are required in accordance with the EIA Regulations to provide the competent authority with sufficient information in order to make an informed decision. The EIA process being undertaken for the proposed general waste disposal site comprises two phases – i.e., Scoping and Impact Assessment - and involves the identification and assessment of environmental impacts through specialist studies, as well as public participation. The process followed in these two phases is as follows:

- » The **Scoping Phase** includes the identification and description of potential impacts associated with the proposed project through a desktop study and consultation with interested and affected parties and key stakeholders. This phase considers the broader project area in order to identify and delineate any environmental fatal flaws, no-go or sensitive areas, as well as project alternatives in order to determine which should be assessed in more detail in the EIA Phase. Following the public review period of the Scoping Report, this phase culminates in the submission of a final Scoping Report and Plan of Study for the EIA Phase to the competent authority for acceptance and approval to continue with the EIA Phase of the process.
- » The **EIA Phase** involves a detailed assessment of potentially significant positive and negative impacts (direct, indirect, and cumulative) identified in the Scoping Phase. This phase considers a proposed development footprint and includes detailed specialist investigations (including field surveys), consideration of feasible alternatives and public consultation. Recommendations of practical and achievable mitigation and management measures are included in an Environmental Management Programme (EMPr) considering all phases of the project. Following the public review period of the EIA Report and EMPr, this phase culminates in the submission of a Final EIA Report and EMPr to the competent authority for review and decision-making.

2. Evaluation of the Umbila Emoyeni EGI

The EIA Report, together with the specialist studies contained within **Appendices D-L** provide a detailed assessment of the potential impacts that may result from the development of the Umbila Emoyeni EGI. No environmental fatal flaws or unacceptable impacts were identified in the detailed specialist studies conducted, provided that the recommended mitigation measures are implemented. These measures include, amongst others, the avoidance of sensitive features within the development footprint and the undertaking of the construction and operational bird and bat monitoring, as specified by the specialists.

The potential environmental impacts associated with the Umbila Emoyeni EGI assessed through the EIA process include:

- » Impacts on terrestrial ecology (flora and fauna).
- » Impacts on freshwater ecology.
- » Impacts on avifauna.
- » Impacts on bats.
- » Impacts on soils and agricultural potential.
- » Impacts on heritage resources, including archaeology, palaeontology and the cultural landscape.
- » Visual impacts on the area imposed by the components of the grid connection infrastructure.
- » Positive and negative social impacts.
- » Traffic impacts.

The development footprint, as assessed in the EIA Report is presented in **Figure 2**.

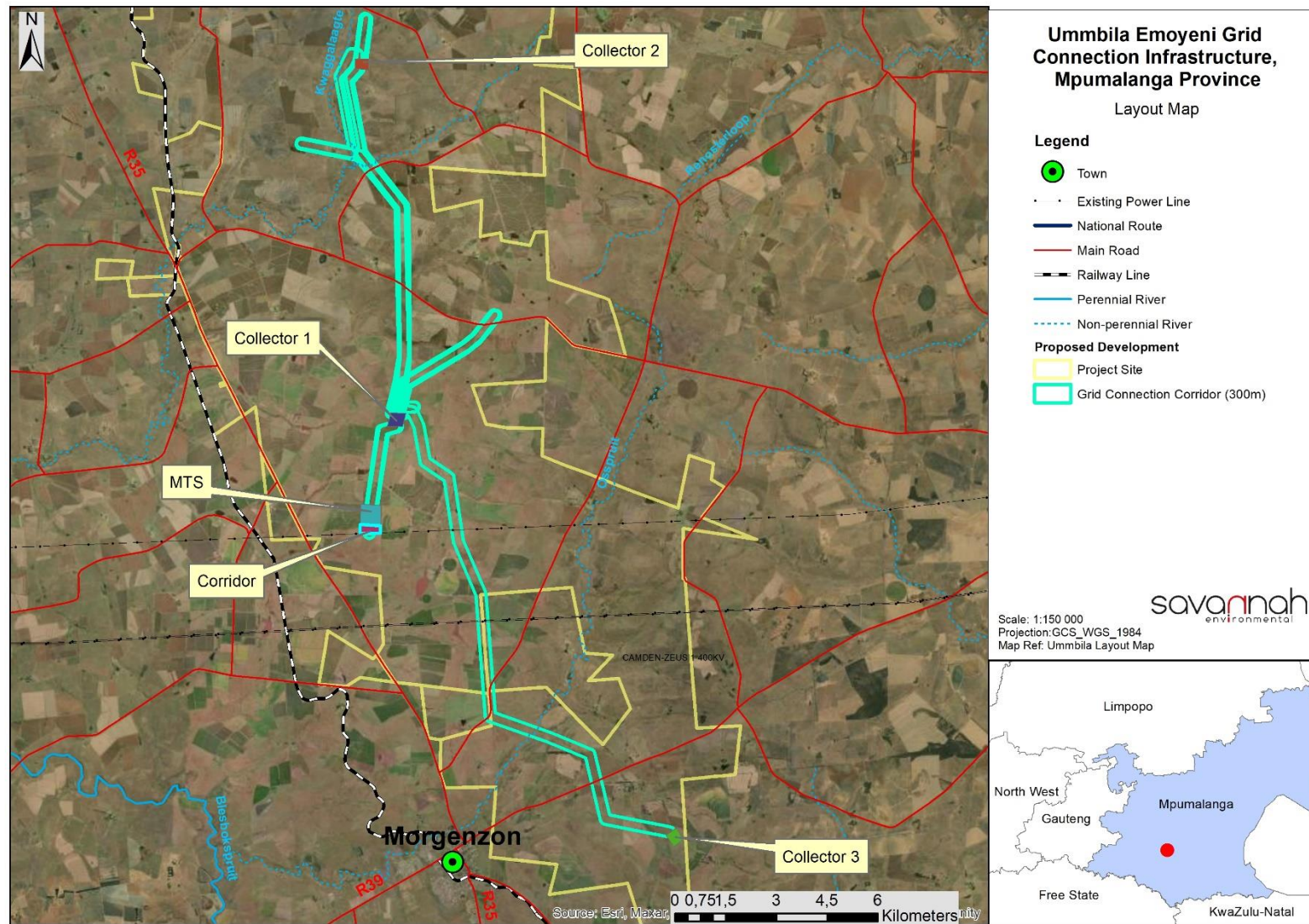


Figure 2: The development footprint of the Umbila Emoyeni EGI, as assessed within the EIA Report

2.1. Impacts on Terrestrial Ecology (including flora and fauna)

From a botanical and ecological perspective, it was found that the study area is mostly comprised of either Moderate (799.58 ha; 45%) or Low (620.56 ha; 35%) sensitivity. Various "Very High" sensitivity areas also occur throughout the study area (comprising features such as wetlands, ephemeral rivers and streams, seepages, and other drainage lines). Furthermore, various CBA and ESA areas occur throughout the study area. Development is highly discouraged within the areas classified as CBA Irreplaceable Areas and development within CBA Optimal Areas should be avoided as far as possible.

A total of 198 plant species were found within the study area, which consisted of 158 native, 0 Red List, 6 protected, 0 Mpumalanga endemic, 39 alien, and 11 NEM:BA listed invasive species.

A total of 32 mammal species, 6 amphibians and 10 reptile species were recorded within the projects site. No amphibian or reptile SCC were recorded within the project site; however, 4 mammal SCC were recorded within the project site namely; Serval (Near Threatened), Brown hyena (Near Threatened); Vlei rat (Near Threatened), Cape clawless otter (Near Threatened) and South African hedgehog (Near Threatened). It was determined that the development will not detrimentally impact these populations/individual SCC.

During this assessment it was determined that the study area contains numerous habitat variations, and include Drainage, Fallow Land, Natural Clay, Natural Dolerite, Natural Loam Soil, Natural Rock Turf, Natural Sandstone, and Disturbed areas. Each of these areas (excluding disturbed areas) have certain unique species, with drainage areas having the highest number (i.e., many of its species are not shared with the other habitats). Development should therefore not proceed within drainage areas, which are all classified as "Very High" sensitivity. Natural rock turf and natural clay areas had the lowest number of species that occurred only in those types, and development should therefore aim to occur within these habitat types, since this would minimize the loss of unique biodiversity.

Furthermore, the only substation infrastructure that will directly impact drainage/wetland areas is Collector Substation 3 as a small portion a seepage wetland is located within the footprint of this substation. It is recommended that this substation's footprint is adjusted in order to avoid any direct impacts on this seepage wetlands. All other substation infrastructure will avoid any direct impact on wetland features. Furthermore, no wetland/drainage features are located within the 400 kV LILO corridor.

There are no impacts associated with the proposed EGI development that cannot be mitigated to a low level. Its local environmental impact can be reduced to an acceptable magnitude. Likewise, the contribution of the proposed EGI to the cumulative impact in the area would be low and is acceptable. As such, there are no fatal flaws associated with the development and no terrestrial ecological considerations that should prevent it from proceeding. Therefore, it is the opinion of the specialists that the development may be authorised within the specified area, subject to the implementation of the recommended mitigation measures.

2.2. Impacts on Freshwater Ecology

All endorheic wetland features, wetland features that are not directly connected to the larger extensive wetland network or that have been fractured/isolated through agricultural practices are classified as High Sensitive. Even though these wetland features do not provide functions and services to the extent of the more connected and larger wetland features, these wetlands still provide some functions and services.

Furthermore, most of these wetland features are fairly small and any direct impacts on these wetland habitats may have a significant impact on the drivers of these wetland features as well as the associated biodiversity. Another feature of these wetlands is the fact that, even though small in size, they are located within relatively small catchment areas, thus these wetlands' percentage coverage in relationship to their catchments are fairly significant, making these wetland features vulnerable to catchment disturbances.

The following buffer areas are recommended and should be implemented for maintaining the freshwater resource features REC (Recommended Ecological Category) allowing the persistence of the current present ecological status as well as their functions and services.

- » A wetland buffer area of 11m from the outer edge of wetland features are recommended and should be implemented for maintaining the freshwater resource features REC (Recommended Ecological Category) allowing the persistence of the current present ecological status as well as well as their functions and services.
- » All freshwater features with their buffer areas have been classified as either Very High- or High sensitive and should be regarded as "No-Go" areas apart from the following activities and infrastructure which may be allowed (although restricted to an absolute minimum footprint):
 - * only activities relating to the route access and cabling:
 - the use/upgrade of existing roads and watercourse crossings are the preferred options;
 - Where no suitable existing roads and watercourse crossings exist, the construction of new access roads and watercourse crossings can be allowed, however this should be deemed as a last resort.
 - All underground cabling should be laid either within access roads or next to access roads (as close as possible).

With mitigation measures in place, impacts on the integrity and functioning of freshwater resource features can be potentially reduced to sufficiently low levels. This would be best achieved by incorporating the recommended management & mitigation measures into an Environmental Management Programme (EMPr) for the site, together with appropriate rehabilitation guidelines and ecological monitoring recommendations.

Based on the outcomes of this study it is the specialist's considered opinion that the proposed project detailed in this report could be authorised from a freshwater resource perspective.

Since there are watercourses present within the development area of the Umbila Emoyeni Solar Energy Facility as identified in the Freshwater Impact Assessment (**Appendix E**), and since water may be abstracted from boreholes for use during the construction and operational phases, a water use authorisation for the project will be required from the DWS for water uses identified in Section 21 (a), Section 21(c) and 21 (i) of the National Water Act (Act 36 of 1998).

2.3. Impacts on Avifauna

Pre-construction bird monitoring was undertaken over a period of 12 months within the project area. The pre-construction bird monitoring included the identification of twelve vantage points, five drive transects, and 15 walk transects of 500m in length across the project site. A total of 102 species (5 805 birds) were recorded during the walk transects conducted across the full pre-construction bird monitoring period.

A total of 26 target species were recorded during vantage point monitoring over the pre-construction monitoring period. A total of 72 observations of 18 target species (comprising 235 birds) were recorded during 703.12km of drive transect observations.

The following sensitivities were identified from an avifaunal perspective:

- » Wetlands - Very High Avifaunal Site Ecological Importance
- » Natural Grasslands – High Avifaunal Site Ecological Importance
- » Agricultural/cultivated fields – Very Low Avifaunal Site Ecological Importance

The primary threat to these species is likely to rather be associated with the risk of collision fatalities, therefore areas and flights that appeared to represent preferred foraging or movement corridors for avifaunal SCCs were considered to have high avifaunal sensitivity. Species utilising the highly modified agricultural areas are likely resilient to disturbance and ongoing activity, including habitat modification. These areas are of low avifaunal sensitivity and are the preferred areas for development activities as well as permanent and temporary structures such as site buildings and lay-down areas. However, species utilising these areas, such as Southern Bald Ibis, remain at risk to collision when commuting to and from foraging areas.

The Avifauna Impact Assessment identified that all impacts associated with the development of the Umbila Emoyeni EGI will be of low, medium and high significance before mitigation, and can be mitigated to an acceptable level of impact (i.e., medium and low significance, depending on the impact being considered). The implementation of additional mitigation measures such as implementation of bird flappers in areas of elevated recorded passage rates will be highly effective at reducing the likelihood of collisions as large flocks of birds are easily detected.

Based on the screening study, reconnaissance study and results of the pre-application avifaunal monitoring programme conducted for the Umbila Emoyeni Renewable Energy Farm and associated infrastructure (including cumulative impacts), it is the avifaunal specialist's informed opinion that the proposed development will not have a significant negative impact on the viability or persistence of avifaunal populations (particularly avifaunal SCCs) in the area following the implementation of mitigation measures. The proposed positions of the EGI provided in the layout are acceptable. It is the specialist's opinion that the proposed development can be approved from an avifaunal perspective and that the layout is acceptable.

2.4. Impacts on Bats

Pre-construction bat monitoring was undertaken over a period of 12 months for the project site in accordance with the best practice guidelines. The monitoring was designed to monitor bat activity across the area for the Umbila Emoyeni EGI.

Bat roosting sites in the project site are relatively limited and unlikely to support large congregations of bats, with no underground sites (e.g., caves, mines, sinkholes) present. The closest known major bat roost is approximately 75km north of the project site. Although occasional ridges and rocky outcrops are features of the landscape, none are present in the project site. Bats are likely to roost in buildings associated with farmsteads within and bordering the project site, especially Cape Serotine and Egyptian Free-tailed Bat. The building inspections on site did not reveal any roosting bats but evidence (e.g., fur-oil-stained exit/entry points) suggests that bats are using these features. Trees growing at these farmsteads and elsewhere on site where they form clumps could also provide roosting spaces for bats.

Sensitive features within the project site at which bat foraging activity may be concentrated include farm buildings (and within built up areas for some species) where they would forage for insects attracted to lighting, dams and wetland areas, within and along the edge of woodland/tree patches, and over cultivated areas (refer to **Table 2**).

Table 2: Features used to assign spatial risk categories in the project site for bats

Risk Level		
Low	Medium	No-Go
Heavily modified land	CBA Optimal	Farm Dams
Moderately modified land	ESA Landscape corridor	Wetlands
	ESA Local corridor	Trees
	Other Natural Areas	Buildings
		Rivers/Streams
		Wetlands
		CBA Irreplaceable Areas

Grid connection infrastructure impacts bats directly because bats collide with the power lines, and indirectly through the modification of habitats, including disturbance or destruction of roosting, foraging and commuting spaces. The potential impacts to bats as a result of construction and operation activities include the following:

- » Modification of bat foraging/commuting habitat.
- » Destruction of/Disturbance to bat roosts.
- » Bat mortality.
- » Disturbance to bats.

Based on the bat activity recorded at the site proposed for the Umbila Emoyeni EGI, the significance ratings for the majority of the impacts to bats posed by the development are predicted to be low and medium significance before mitigation. After mitigation, all impacts are predicted to be low. Based on the opportunity for reduction of the impacts through appropriate mitigation measures and appropriate micro-siting of infrastructure to avoid areas of sensitivity from a medium significance to a low, acceptable significance, no fatal flaws are expected to occur. Provided these mitigation measures are adhered to, it is the specialist's opinion that the project assessed can be approved.

2.5. Impacts on Soils and Agricultural Potential

Four main sensitive soil forms were identified within the project site, namely the Vaalbos, Avalon, Ermelo and Tukululo soil forms. The land capability sensitivity (DAFF, 2017) indicates a range of sensitivities expected throughout the project site, which predominantly covers "Low" to "Moderate" sensitivities. Smaller patches are characterised by sensitivities up to "Moderately High". Furthermore, various crop field boundaries were identified by means of the DFFE Screening Tool (2022), which are predominantly characterised by "High" sensitivities with one area being classified as "Very High" sensitivity.

The specialist has recommended that such high potential crop fields be avoided by throughout the life of the operation. If avoidance is not feasible, stakeholder engagement must be undertaken to compensate landowners for high crop field land use areas where necessary. In a case where relocating the project infrastructure is not feasible, the developer should engage with the owners of the crop fields for an appropriate compensation.

The Soils and Agricultural Potential Impact Assessment identified that all impacts associated with the development of the Umbila Emoyeni EGI will be of low significance before mitigation, and can be mitigated to an impact level of low significance. It is the specialist's opinion that the proposed development will have an overall low residual impact on the agricultural production ability of the land.

2.6. Impacts on Heritage Resources (archaeology, palaeontology and cultural landscape)

The proposed development will not have a substantial negative impact on the archaeological heritage resources identified within the proposed development area for the grid connection infrastructure. No Stone Age or Iron age archaeology was identified during the field assessment. Some historical ruins and kraals of contextual historic significance, graded III C, were identified; however, none of these are likely to be impacted as per the layout provided and assessed.

A number of burial grounds and/or graves were identified during the field assessment (Grade III A) and some of these fall within areas likely to be impacted as per the proposed layout. A 50m no-go buffer has been recommended around these burial grounds. The burial ground recorded as Observation 008 is located away from any proposed infrastructure and is therefore unlikely to be impacted by the development. However, it is still recommended that a no-development area of 50m be implemented around this site to ensure that no impact takes place.

No palaeontological no-go areas have been identified within the project areas. With the exception of one fossil site of low scientific value, none of the recorded fossil sites overlaps directly with, or lies close to (< 20 m) the proposed infrastructure and no modification of the layouts through micro-siting is proposed here on palaeontological grounds.

Impacts on archaeological and palaeontological heritage are expected to be of medium and high significance pre-mitigation and can be reduced to low significance post-mitigation.

Based on the outcomes of the Heritage Impact Assessment, it is not anticipated that the proposed development of the grid connection infrastructure will negatively impact on significant heritage resources on condition the recommended mitigation measures are adhered to.

2.7. Visual Impacts

The following sensitivities have been identified from a visual perspective:

- » Highly sensitive areas include:
 - * Areas immediately surrounding settlement and homesteads development of which is likely to significantly change the character of views for residents. A 1000m buffer is proposed which should be sufficient to ensure that development does not totally dominate views. It is possible that receptors (owners /residents) have no concern regarding the development of these areas, in which case the sensitivity rating will reduce.
 - * Areas on and immediately beside ridgelines as the development of these areas is likely to be more visible to surrounding areas including protected areas. A 1000m buffer is proposed; and Corridors beside the main roads that could be affected including the N17, the R35, and the R39. This is deemed sensitive because development in this corridor is likely to be highly obvious to people travelling along the roads the proposed 500m corridor should be sufficient to ensure that development does not totally dominate views.
- » Medium sensitivity areas include:

- * Watercourses and a buffer of 250m either side of watercourses. These areas are proposed in order to protect these natural features within the proposed focus area.
- » Low sensitivity areas include:
 - * Valley side slopes the development of which is likely to make the project least obvious from surrounding areas. The fact that development may be focused on areas with relatively low sensitivity does not preclude the necessity for mitigation.

The elements associated with the proposed grid connection are to a degree subject to the locations of the proposed renewable energy projects. A key consideration is the location of the proposed MTS relative to the renewable energy projects and the connection point on the existing 400kV overhead power line. The closer that it is located to the connection point the shorter the necessary additional 400kV loop in / loop out overhead power line is likely to be. Whilst this could mean that necessary overhead power line connections between the renewable energy projects and the MTS may be longer, these are likely to be lower power lines with significantly lower impacts.

At this early stage therefore a key consideration from minimising landscape and visual impacts is to locate the MTS as close to the existing 400kV overhead power line as possible as this is likely to minimise the extent of largest elements associated with the proposed grid connection that are likely to result in the largest impacts. It will also ensure that the impacts associated with these elements are most likely to impact areas that are currently affected by views of the existing 400kV overhead power line which is likely to help safeguard other areas of the landscape that are currently unaffected.

If the necessary overhead power lines and MTS were to be located in a manner that prevented them being visible to stakeholders, the entire focus area would be indicated as being highly sensitive. This wouldn't provide guidance of any value. It also needs to be borne in mind that the overhead power lines and the MTS are likely to be visible to differing extents and distances.

The proposed project will generally result in landscape and visual impacts of low to medium significance, depending on the distance from the grid connection infrastructure. Subject to mitigation measures being undertaken, from a Landscape and Visual Impact perspective, it is the specialist's opinion that there is no reason why the proposed project should not be authorised.

2.8. Socio-Economic Impacts

Impacts are expected to occur with the development of the Umbila Emoyeni EGI during the construction and decommissioning phases. Both positive and negative impacts are identified and assessed.

Impacts during construction include:

- » Impact on production.
- » Impact on the Gross Domestic Product (GDP).
- » Impact on employment creation.
- » Skills development.
- » Household income and standard living.
- » Temporary increase in government revenue.
- » Change in sense of place.
- » Safety and security.
- » Agricultural operations.
- » Influx of people.

- » Daily movement patterns.

Impacts during the operation phase include:

- » Impact on production.
- » Impact on the GDP.
- » Employment creation.
- » Household income and standard of living.
- » Increase in government revenue.
- » Rental revenue for landowners.
- » Improvement in energy sector generation.
- » Visual and sense of place impacts.
- » Impacts on agricultural operations.

Positive impacts during construction are expected to be of medium significance pre-enhancement and can be increased to medium (different score) post-enhancement. Negative impacts during construction are expected to be of medium and low significance pre-mitigation and can be reduced to medium (different score) and low significance post-mitigation, depending on the type of impact.

The net positive impacts associated with the development of the proposed project are expected to outweigh the net negative effects. The project is also envisaged to have a positive stimulus on the local economy and employment creation, leading to the economy's diversification and a small reduction in the unemployment rate. The project should therefore be considered for development. It should, however, be acknowledged that the negative impacts would be largely borne by the nearby farms and households residing on them, whilst the positive impacts will be distributed throughout both the local and national economies. Due to this imbalance, it is recommended that the mitigation measures suggested being strictly adhered to. Application of these mitigation measures will ensure that the negative impacts on the nearby farms and businesses are minimised and that the distribution of the potential benefits of the project are more balanced.

2.9. Traffic Impacts

It is assumed that if components are imported to South Africa, it will be via the Port of Richards Bay in KwaZulu-Natal, or the ports of East London and Ngqura in the Eastern Cape. The Port of Richards Bay is located ~460km travel distance from the proposed site whilst the ports of East London and Ngqura are respectively located ~1 130km and 1 200km travel distance from the proposed site. The Port of Richards Bay is the preferred port of entry; however, the ports of East London and Ngqura can be used as alternatives, should the Port of Richards Bay not be available.

The proposed site is bounded by the N17 in the south, the R39 in the south and east and the R35 in the west. Access to the proposed site can be obtained from any of these three roads, depending on the traffic volumes of each road. The road carrying the least traffic will be considered as the best option. There is also an existing network of unnumbered gravel roads that might be suitable as a main access road to the proposed site.

The construction and decommissioning phases of an EGI are the only significant traffic generators and therefore noise, dust and exhaust pollution will be higher during these phases. The duration of these phases is short term i.e., the impact of the EGI on traffic on the surrounding road network is temporary. The access point to the proposed site has been assessed and was found to be acceptable from a transport

perspective. The development is supported from a transport perspective provided that the recommendations and mitigation measures are adhered to.

2.10 Assessment of Cumulative Impacts

Cumulative impacts and benefits on various environmental and social receptors will occur to varying degrees with the development of several renewable energy facilities in South Africa. The degree of significance of these cumulative impacts is difficult to predict without detailed studies based on more comprehensive data/information on each of the receptors and the site-specific developments. The alignment of renewable energy developments with South Africa's National Energy Response Plan and the global drive to move away from the use of non-renewable energy resources and to reduce greenhouse gas emissions is undoubtedly positive. The economic benefits of renewable energy developments at a local, regional and national level have the potential to be significant.

There are several authorised renewable energy projects within a 30km radius of the proposed site, namely:

- » Majuba Solar PV Facility.
- » Tutuka Solar PV Facility.
- » Forzando North Coal Mine Solar PV Facility.
- » Hendrina Renewable Energy Complex.

In addition to the renewable energy facilities listed above, a number of existing power lines and substations are located within the area, including several low voltage power lines supported by wooden poles and high voltage infrastructure such as the Camden / Sol 2 400kV and the Camden / Tutuka 1 400kV power lines which cross the study area.

The majority of cumulative impacts associated with the Umbila Emoyeni EGI will be of a low significance, medium and high significance, with impacts of a high significance associated with the impacts on bats (which is largely associated with the wind energy facility which the EGI will support) and the socio-economic environment. A summary of the cumulative impacts is included in **Table 3** below.

Table 3: Summary of the cumulative impact significance for the Umbila Emoyeni EGI

Specialist assessment	Overall significance of impact of the proposed project considered in isolation	Cumulative significance of impact of the project and other projects in the area
Terrestrial Ecology	Low	Low and Medium
Freshwater Ecology	Low	Low
Avifauna	High	Medium
Bats	Medium	High
Soils and Agricultural Potential	Low	Low
Heritage (including archaeology, palaeontology and sense of place)	Medium	Medium
Visual	Low	Low and High
Socio-Economic	<i>Positive impacts:</i> Medium <i>Negative impacts:</i> Medium	<i>Positive impacts:</i> Medium <i>Negative impacts:</i> Medium

Specialist assessment	Overall significance of impact of the proposed project considered in isolation	Cumulative significance of impact of the project and other projects in the area
Traffic	Low	Medium (assuming all projects in the area are constructed at the same time)

Based on the specialist cumulative assessment and findings, the development of the Umbila Emoyeni EGI and its contribution to the overall impact of all renewable energy projects to be developed within a 30km radius, it can be concluded that the Umbila Emoyeni EGI cumulative impacts will be of low, medium and high significance, with impacts of a high significance mainly relating to visual impacts and the positive impacts on the socio-economic environment. Based on all other areas of study considered as part of this EIA report, the development of the Umbila Emoyeni EGI will not result in unacceptable, high cumulative impacts and will not result in a whole-scale change of the environment.

2.11 Assessment of No-go Alternative

The no-go option is the continuation of the existing land use, i.e. maintain the status quo. As detailed in the sections above, there would be no environmental impacts on the site or to the surrounding local area due to the construction activities of grid connection infrastructure with the implementation of this alternative. All negative impacts, specifically related to the development of the EGI, discussed in this report will not materialise.

The 'do-nothing' alternative will do little to influence the renewable energy targets set by government. However, as the project would provide essential supporting infrastructure to the proposed Umbila Emoyeni Wind Energy Facility and Umbila Emoyeni Solar Energy Facility (a total of 816MW), not developing the Umbila Emoyeni EGI would see the opportunity to develop these renewable energy projects being lost as there would be no means for them to connect to the electricity grid. Therefore, the 'do-nothing' alternative is not preferred.

From the specialist studies undertaken, no environmental fatal flaws were identified to be associated with the Umbila Emoyeni EGI subject to implementation of the recommended mitigation measures. All impacts associated with the project can be mitigated to acceptable levels. If the grid connection infrastructure is not developed, the following positive impacts will not be realised:

- » Job creation from the construction and operation phases.
- » Economic benefit to participating landowners due to the revenue that will be gained from leasing the land to the developer.
- » Meeting of energy generation mix in a most economic and rapid manner.
- » Provision of clean, renewable energy in an area where it is optimally available.

As detailed above, the 'do-nothing' alternative will result in a number of lost opportunities. The 'do nothing' alternative is therefore not preferred and not proposed to be implemented for the development of the Umbila Emoyeni EGI.

3. Assessment of the Grid Layout

The indicative EGI layout/development footprint assessed within this EIA Report (**Figure 2**) was designed by the project developer in order to respond to and avoid the sensitive environmental and social features

located within the project site, which were identified by the specialists during the Scoping Phase of the EIA process. This approach ensured the application of the mitigation hierarchy (i.e., avoid, minimise, mitigate, and offset) to the proposed project, which ultimately ensures that the development is appropriate from an environmental perspective and is suitable for development within the project site.

Based on the findings as documented in this EIA report, it was concluded that this layout avoids areas of sensitivity and therefore no further optimisation was recommended. As such, the impact of this proposed Facility Layout is considered to be acceptable and the layout is recommended for approval. Final micro-siting must however be undertaken prior to construction considering all mitigation measures recommended within this EIA Report and associated specialist studies.

4. Environmental Costs versus Benefits of the Umbila Emoyeni Renewable Energy Facility

Environmental costs (including those to the natural environment, economic and social environment) can be anticipated at a local and site-specific level and are considered acceptable provided the mitigation measures as outlined in the EIA Report and the EMP are implemented and adhered to. No fatal flaws have been identified. These environmental costs could include:

- » *Loss of biodiversity, flora and fauna due to the clearing of land for the construction and utilisation of land for the wind farm* - The cost of loss of biodiversity has been minimised/avoided through avoiding placement of project components and infrastructure within the ecological features considered to be of very high sensitivity (no-go areas).
- » *Impacts on freshwater resources* - the impacts on freshwater resources have been minimised through the avoidance of the sensitive features by project infrastructure. Access roads will however need to cross some freshwater resource features, some of which will be on existing gravel roads.
- » *Visual impacts associated with the wind farm/impacts to the sense of place* - The Umbila Emoyeni EGI will be visible to receptors up to a distance of 22km. No mitigation of this impact is possible (i.e., the structures will be visible in the landscape), but general mitigation and management are required as best practise to minimise secondary visual impacts which may arise from mismanagement of the site. Other large scale industrial operations including transmission lines and substations, mining operations and power stations are relatively obvious in the region. Whilst the proposed project will create a new large scale industrial operation and change the character of an area of rural landscape, this is not entirely out of character with the region.
- » *Loss of land for agriculture* – The development will remove areas available for agricultural activities; however, based on the small development footprint of the EGI and the fact that agricultural activities can continue on the properties together with the development, this will be limited and not significant.
- » *Impacts on birds and bats* – loss of birds and bats species due to collision with infrastructure and habitat destruction. The impact has been minimised through the avoidance of areas of very high sensitivity (no-go areas) and is considered to be acceptable with implementation of mitigation measures.
- » *Negative impact to the cultural landscape* - The Umbila Emoyeni EGI is proposed within a landscape area with an overriding rural character within which there are large industrial nodes including mining operations and coal fired power stations. Whilst the proposed project will create a new large scale industrial node within the agricultural landscape, this is not entirely out of character with the broader region. However, it will be a significant local character change.
- » *Loss of heritage and palaeontological resources* – Six burial grounds were identified within and close to the project site, around which a 50m no-go buffer has been recommended. With the exception of one fossil site of low scientific value, none of the recorded fossil sites overlaps directly with, or lies close to (< 20m) the proposed infrastructure.

Benefits of the Umbila Emoyeni EGI include the following:

- » The project will facilitate the connection of the wind and solar energy facilities proposed as part of the Umbila Renewable Energy Farm to the national grid. This is a total of 816MW additional electricity available to the national grid. This will have benefits at a national level.
- » The project will result in important economic benefits at the local and regional scale through job creation, income and other associated downstream economic development. These will persist during the pre-construction, construction, and decommissioning phases of the project.
- » The project contributes towards the Provincial and Local goals for the development of renewable energy as outlined in the respective IDPs, as it provides essential infrastructure for solar and wind energy facilities.
- » The project supports wind and solar developments which serve to diversify the economy and electricity generation mix of South Africa, in line with national policy regarding energy generation.
- » South Africa's per capita greenhouse gas emissions are amongst the highest in the world due to the reliance on fossil fuels. The Umbila Emoyeni EGI will support 816MW of renewable energy which will contribute to achieving goals for implementation of renewable energy and sustaining a 'green' economy within South Africa.

The benefits of the Umbila Emoyeni EGI are expected to occur at a national, regional and local level. As the costs to the environment at a site-specific level have been largely limited through the appropriate placement of infrastructure on the project site within lower sensitive areas, the benefits of the project are expected to partially offset the localised environmental costs of the grid connection infrastructure, provided that the mitigation measures, as recommended by the specialists are adhered to.

5. Overall Conclusion (Impact Statement)

The preferred activity was determined by the developer to be the development of grid connection infrastructure, including 132kV and 400kV infrastructure, to transmit and distribute electricity generated from the proposed renewable energy facilities included within the Umbila Renewable Energy Farm. A technically viable development footprint was proposed by the developer considering environmental sensitivities identified in the scoping study and assessed as part of the EIA process. The assessment of the development footprint within the project site was undertaken by independent specialists and their findings have informed the results of this EIA Report.

From a review of the relevant policy and planning framework, it was concluded that the project is well aligned with the policy framework as a result of it providing essential supporting infrastructure for renewable energy development, and a clear need for the project is seen from a policy perspective at a local, provincial and National level.

The specialist findings from the EIA studies undertaken have indicated that there are no identified fatal flaws associated with the implementation of the development footprint within the project site subject to implementation of the recommended mitigation measures. The developer has designed a project development footprint in response to the identified sensitive environmental features and areas present within the project site. This approach is in line with the application of the mitigation hierarchy, where all the sensitive areas which could be impacted by the development have been avoided (i.e., tier 1 of the mitigation hierarchy).

Impacts can be mitigated to acceptable levels or enhanced through the implementation of the recommended mitigation or enhancement measures. This is however not relevant for the visual impact of

the grid connection infrastructure as the EGI components will be visible regardless of the mitigation applied. This high significance rating is, however, not considered as a fatal flaw by the specialist.

As detailed in the cost-benefit analysis, the benefits of the Umbila Emoyeni EGI are expected to occur at a national, regional and local level. As the costs to the environment at a site-specific level have been largely limited through the appropriate placement of infrastructure on the project site within lower sensitive areas through the avoidance of features and areas considered to be sensitive/no-go for development, the benefits of the project are expected to partially offset the localised environmental costs of the grid connection infrastructure. From a social perspective, both positive and negative impacts are expected.

Through the assessment of the development footprint within the project site, it can be concluded that the development of the Umbila Emoyeni EGI will not result in unacceptable environmental impacts (subject to the implementation of the recommended mitigation measures).

6. Overall Recommendation

Considering the findings of the independent specialist studies, the impacts identified, the development footprint proposed by the developer, the avoidance of the sensitive environmental features within the project site, as well as the potential to further minimise the impacts to acceptable levels through mitigation, it is the reasoned opinion of the EAP that the Umbila Emoyeni EGI is acceptable within the landscape and can reasonably be authorised subject to implementation of the refined optimised facility layout and the mitigation and enhancement measures recommended by the specialists.

The grid connection infrastructure will include:

- » A new 400/132 kV Main Transmission Substation (MTS), to be located adjacent to the Camden SOL Overhead Lines (OHLs).
- » New collector stations: each will comprise several incoming 132 kV lines from each project switching station, feeder bays, 132kV bus bars and outgoing line to the MTS.
- » Two 400kV loop-in loop-out OHLs to the existing Camden-Sol 400kV transmission line.
- » On-site switching stations (132kV in capacity) at each renewable energy facility.
- » 132kV power lines from the switching stations to the collector substations and ultimately to a new MTS.
- » On-site IPP substations where the generated power will be transformed from 33 kV to 132 kV so that it can be evacuated to Collector station and MTS
- » Access roads up to 8m wide.

The 400/132kV MTS will serve as the main point of connection to which the internal 132kV power lines of the proposed Umbila Emoyeni Wind and Solar Energy facilities will connect. The connection of the proposed 400/132kV MTS to the national grid will be via a new loop-in loop-out 400kV power line that will connect into the existing Camden-Sol 400kV transmission line.

The following key conditions would be required to be included within an authorisation issued for the Umbila Emoyeni EGI:

- » All mitigation measures detailed within this EIA Report, as well as the specialist reports contained within **Appendices D to L** are to be implemented.
- » The EMPs (for the power lines and onsite substations) as contained within **Appendix N** of this EIA Report should form part of the contract with the Contractors appointed to construct and maintain the grid

connection infrastructure in order to ensure compliance with environmental specifications and management measures. The implementation of this EMPr for all life cycle phases of the Umbila Emoyeni EGI is considered key in achieving the appropriate environmental management standards as detailed for this project.

- » Following the final design of the Umbila Emoyeni EGI, a final layout must be submitted to DFFE for review and approval prior to commencing with construction. Micro-siting must take all recommended mitigation measures into consideration. No development is permitted within the identified no-go areas as detailed in **Figure 3**
- » An Environmental Site Officer (ESO) must form part of the on-site team to ensure that the EMPr is implemented and enforced and an Environmental Control Officer (ECO) must be appointed to oversee the implementation activities and monitor compliance for the duration of the construction phase.
- » Preconstruction walk-through of the final development footprint for protected species that would be affected and that can be translocated must be undertaken. The survey must also cover sensitive habitats and species that are required to be avoided. Permits from the relevant provincial authorities, will be required to relocate and/or disturb listed plant species.
- » Prevent birds from nesting in substation infrastructure through exclusion covers or spikes if required (determined on a case-by-case basis).
- » All other relevant environmental permits must be obtained prior to the construction of the facility.

A validity period of 10 years of the Environmental Authorisation is requested, should the project obtain approval from DFFE.

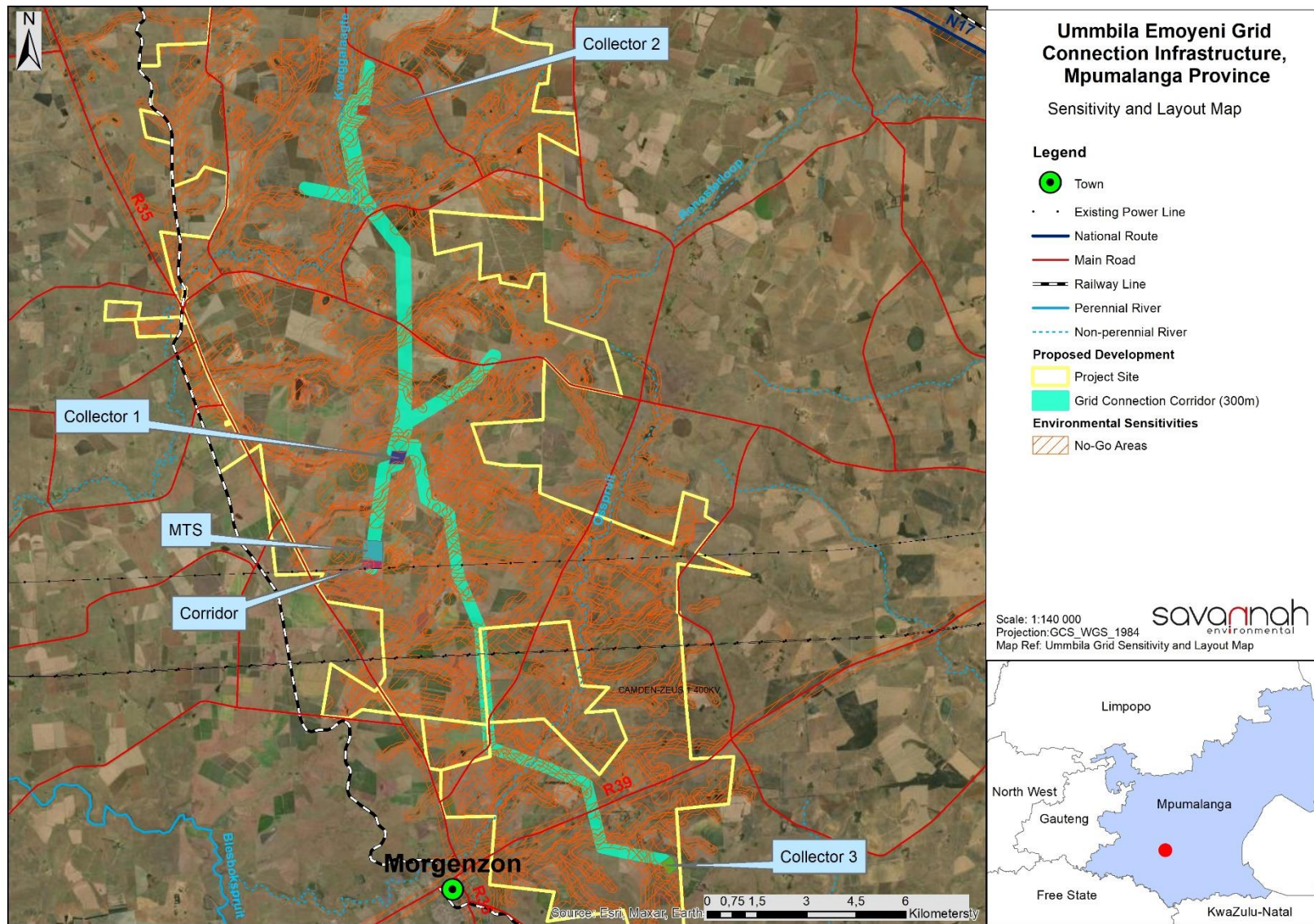


Figure 3: Environmental sensitivity map from the results of the scoping evaluation for the Umbila Emoyeni EGI

DEFINITIONS AND TERMINOLOGY

Alternatives: Alternatives are different means of meeting the general purpose and need of a proposed activity. Alternatives may include location or site alternatives, activity alternatives, process or technology alternatives, temporal alternatives or the 'do nothing' alternative.

Commence: The start of any physical activity, including site preparation and any other activity on site furtherance of a listed activity or specified activity, but does not include any activity required for the purposes of an investigation or feasibility study as long as such investigation or feasibility study does not constitute a listed activity or specified activity.

Commercial Operation date: The date after which all testing and commissioning has been completed and is the initiation date to which the seller can start producing electricity for sale (i.e. when the project has been substantially completed).

Commissioning: Commissioning commences once construction is completed. Commissioning covers all activities including testing after all components are installed.

Construction: Construction means the building, erection or establishment of a facility, structure or infrastructure that is necessary for the undertaking of a listed or specified activity. Construction begins with any activity which requires Environmental Authorisation.

Cumulative impacts: Impacts that result from the incremental impact of the proposed activity on a common resource when added to the impacts of other past, present or reasonably foreseeable future activities (e.g. discharges of nutrients and heated water to a river that combine to cause algal bloom and subsequent loss of dissolved oxygen that is greater than the additive impacts of each pollutant). Cumulative impacts can occur from the collective impacts of individual minor actions over a period and can include both direct and indirect impacts.

Decommissioning: To take out of active service permanently or dismantle partly or wholly, or closure of a facility to the extent that it cannot be readily re-commissioned. This usually occurs at the end of the life of a facility.

Development area: The development area is that identified area (located within the project site) where the Umbila Emoyeni EGI is planned to be located. The development area is still to be determined.

Development footprint: The development footprint is the defined area (located within the development area) where the infrastructure for the Umbila Emoyeni EGI is planned to be constructed. This is the actual footprint of the facility, and the area which would be disturbed.

Direct impacts: Impacts that are caused directly by the activity and generally occur at the same time and at the place of the activity (e.g. noise generated by blasting operations on the site of the activity). These impacts are usually associated with the construction, operation, or maintenance of an activity and are generally obvious and quantifiable.

'Do nothing' alternative: The 'do nothing' alternative is the option of not undertaking the proposed activity or any of its alternatives. The 'do nothing' alternative also provides the baseline against which the impacts of other alternatives should be compared.

Endangered species: Taxa in danger of extinction and whose survival is unlikely if the causal factors continue operating. Included here are taxa whose numbers of individuals have been reduced to a critical level or whose habitats have been so drastically reduced that they are deemed to be in immediate danger of extinction.

Emergency: An undesired/ unplanned event that results in a significant environmental impact and requires the notification of the relevant statutory body, such as a local authority.

Endemic: An "endemic" is a species that grows in a particular area (is endemic to that region) and has a restricted distribution. It is only found in a particular place. Whether something is endemic or not depends on the geographical boundaries of the area in question and the area can be defined at different scales.

Environment: the surroundings within which humans exist and that are made up of:

- i. The land, water and atmosphere of the earth;
- ii. Micro-organisms, plant and animal life;
- iii. Any part or combination of (i) and (ii) and the interrelationships among and between them; and
- iv. The physical, chemical, aesthetic and cultural properties and conditions of the foregoing that influence human health and well-being.

Environmental impact: An action or series of actions that have an effect on the environment.

Environmental impact assessment: Environmental Impact Assessment, as defined in the NEMA EIA Regulations and in relation to an application to which scoping must be applied, means the process of collecting, organising, analysing, interpreting and communicating information that is relevant to the consideration of that application.

Environmental management: Ensuring that environmental concerns are included in all stages of development, so that development is sustainable and does not exceed the carrying capacity of the environment.

Environmental management programme: An operational plan that organises and co-ordinates mitigation, rehabilitation and monitoring measures in order to guide the implementation of a proposal and its ongoing maintenance after implementation.

Heritage: That which is inherited and forms part of the National Estate (Historical places, objects, fossils as defined by the National Heritage Resources Act of 2000).

Indigenous: All biological organisms that occurred naturally within the study area prior to 1800.

Indirect impacts: Indirect or induced changes that may occur because of the activity (e.g. the reduction of water in a stream that supply water to a reservoir that supply water to the activity). These types of impacts include all the potential impacts that do not manifest immediately when the activity is undertaken or which occur at a different place because of the activity.

Interested and affected party: Individuals or groups concerned with or affected by an activity and its consequences. These include the authorities, local communities, investors, work force, consumers, environmental interest groups, and the public.

Method statement: A written submission to the ECO and the site manager (or engineer) by the EPC Contractor in collaboration with his/her EO.

Mitigation hierarchy: The mitigation hierarchy is a framework for managing risks and potential impacts related to biodiversity and ecosystem services. The mitigation hierarchy is used when planning and implementing development projects, to provide a logical and effective approach to protecting and conserving biodiversity and maintaining important ecosystem services. It is a tool to aid in the sustainable management of living, natural resources, which provides a mechanism for making explicit decisions that balance conservation needs with development priorities

No-go areas: Areas of environmental sensitivity that should not be impacted on or utilised during the development of a project as identified in any environmental reports.

Pollution: A change in the environment caused by substances (radio-active or other waves, noise, odours, dust or heat emitted from any activity, including the storage or treatment or waste or substances.

Pre-construction: The period prior to the commencement of construction, this may include activities which do not require Environmental Authorisation (e.g., geotechnical surveys).

Project site: The project site is the area with an extent of 27 819ha, within which the Umbila Emoyeni EGI development footprint will be located.

Rare species: Taxa with small world populations that are not at present Endangered or Vulnerable but are at risk as some unexpected threat could easily cause a critical decline. These taxa are usually localised within restricted geographical areas or habitats or are thinly scattered over a more extensive range. This category was termed Critically Rare by Hall and Veldhuis (1985) to distinguish it from the more generally used word "rare."

Red data species: Species listed in terms of the International Union for Conservation of Nature and Natural Resources (IUCN) Red List of Threatened Species, and/or in terms of the South African Red Data list. In terms of the South African Red Data list, species are classified as being extinct, endangered, vulnerable, rare, indeterminate, insufficiently known or not threatened (see other definitions within this glossary).

Significant impact: An impact that by its magnitude, duration, intensity, or probability of occurrence may have a notable effect on one or more aspects of the environment.

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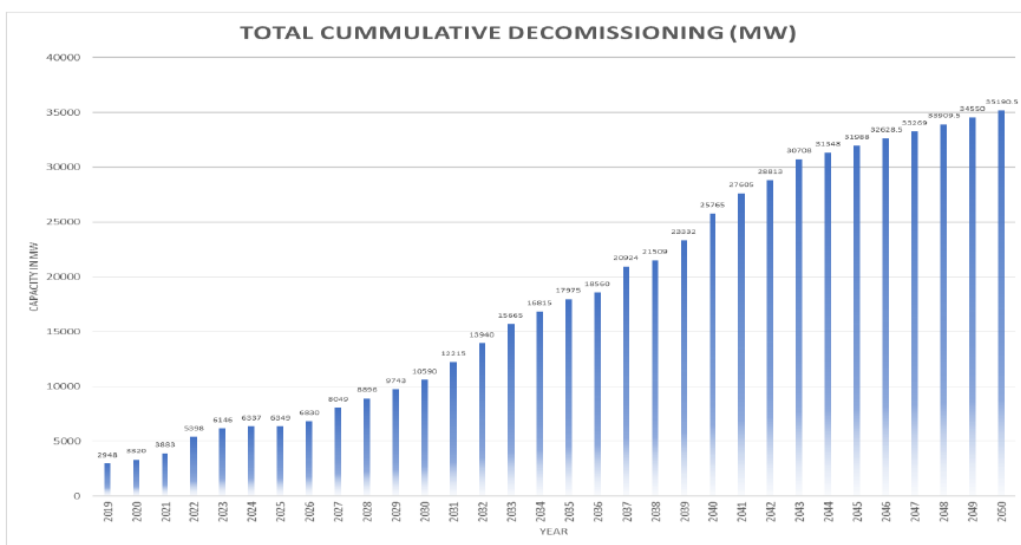
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CHAPTER 1: INTRODUCTION

Emoyeni Renewable Energy Farm (Pty) Ltd is proposing the development of Electrical Grid Infrastructure (EGI) to support the Umbila Emoyeni Renewable Energy Farm (which will comprise a 666MW Wind Energy Facility and a 150MW Solar Energy Facility), which aims to export energy to the national electricity grid. The project (hereafter also referred to as 'Umbila Emoyeni EGI') is located ~6km south-east of Bethal and 1km east of Morgenzon, within the Mpumalanga Province. The project site is located across the Govan Mbeki and Lekwa Local Municipalities within the Gert Sibande District (refer to **Figure 1.1**).

The proposed 666MW wind farm, 150MW of solar energy facility, and associated grid connection solution are collectively referred to as the Umbila Emoyeni Renewable Energy Farm. The renewable energy facilities which the Umbila Emoyeni EGI will support will be constructed as a separate stand-alone project and therefore, separate Scoping and Environmental Impact Assessment (S&EIA) processes will be undertaken for each facility. The scope of this EIA Report is solely focused on the Umbila Emoyeni EGI and is considered to be the grid connection solution for the proposed renewable energy facilities.

The Umbila Emoyeni Renewable Energy Farm is proposed in response to the identified objectives of national and provincial government and local and district municipalities to develop renewable energy facilities for power generation purposes. It is the developer's intention to bid the renewable energy facilities under the Department of Mineral Resources and Energy's (DMRE's) Renewable Energy Independent Power Producer Procurement (REIPPP) Programme or a similar programme, with the aim of evacuating the generated power into the national grid. This will aid in the diversification and stabilisation of the country's electricity supply, in line with the objectives of the Integrated Resource Plan (IRP), with the Umbila Emoyeni Renewable Energy Farm set to inject up to 816MW of electricity into the national grid (wind and solar generation). Similarly, the location of the new generation in the Mpumalanga Province is important in the context of the Just Energy Transition (JET). The Umbila Emoyeni Projects will provide valuable jobs and socio-economic benefits that are required in an area where coal fired generation will be phased out over the next 10 years (see graph below). This will be vitally important if the JET is to be successfully implemented and is a transition for everyone.



Source: 2019 Finalised Integrated Resource Plan ("IRP")

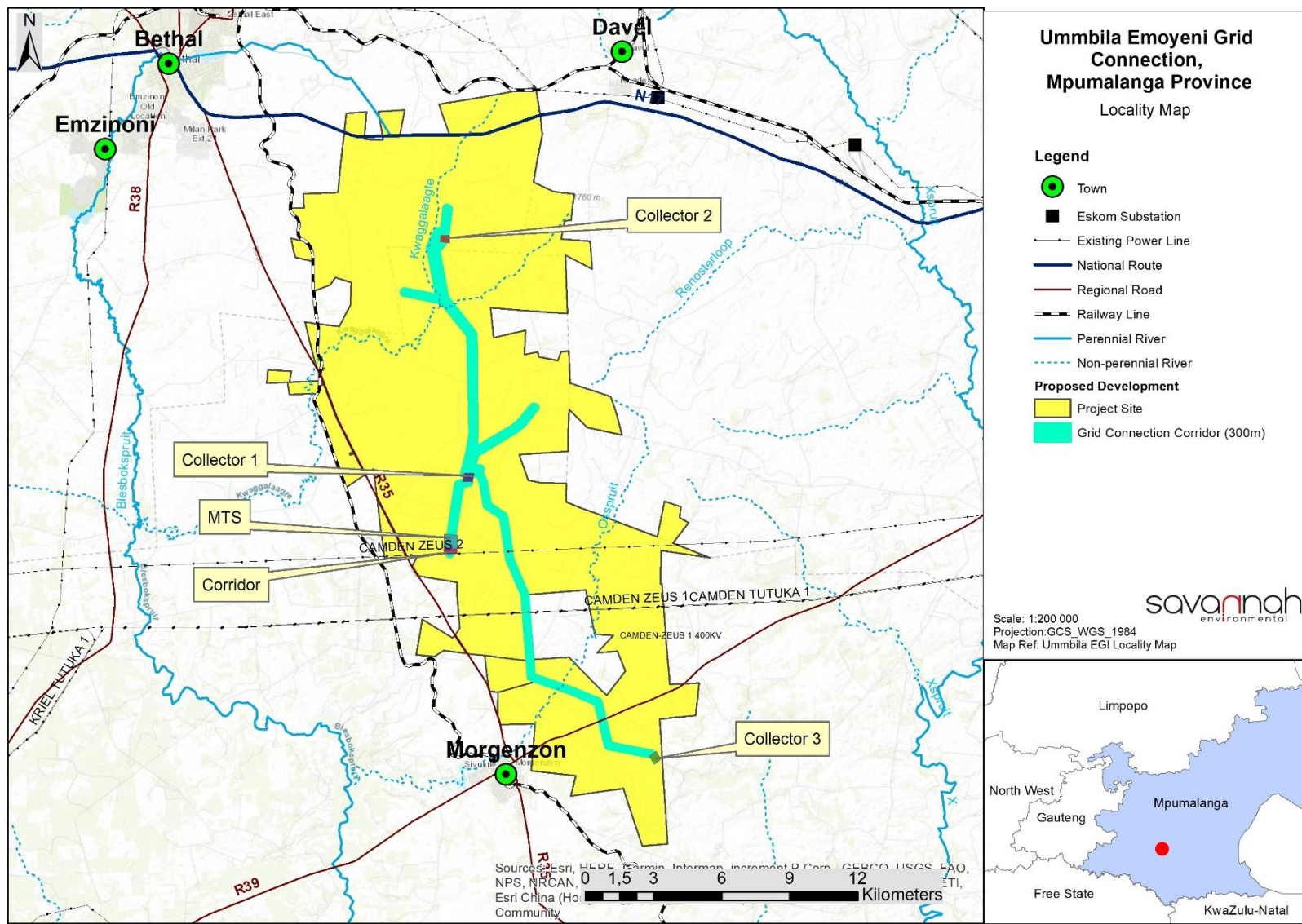


Figure 1.1: Locality map of the project site within which the Umbila Emoyeni Renewable Energy Farm (including the Umbila Emoyeni EGI) is proposed to be developed (also refer to **Appendix N** for project maps).

1.1. Requirement for an Environmental Impact Assessment Process

Section 24 of South Africa's National Environmental Management Act (No. 107 of 1998) (NEMA) pertains to Environmental Authorisations (EA), and requires that the potential consequences for, or impacts of, listed or specified activities on the environment be considered, investigated, assessed, and reported on to the Competent Authority CA. The 2014 Environmental Impact Assessment (EIA) Regulations, as amended (GNR 326), published under the NEMA prescribe the process to be followed when applying for EA, while the Listing Notices (Listing Notice 1 (GNR 327), Listing Notice 2 (GNR 325), and Listing Notice 3 (GNR 324)) contain those activities which may not commence without an EA from the Competent Authority.

As the project has the potential to impact on the environment, an EA is required from the National Department of Forestry, Fisheries, and the Environment (DFFE) subject to the completion of a full S&EIA process, as prescribed in Regulations 21 and 24 of the 2014 EIA Regulations (GNR 326), as amended. The requirement for EA subject to the completion of a full S&EIA process is triggered by the inclusion of, amongst others, Activity 9 of Listing Notice 2 (GNR 325), namely:

"The development of facilities or infrastructure for the transmission and distribution of electricity with a capacity of 275 kilovolts or more, outside an urban area or industrial complex."

Due to the fact that the Umbila Emoyeni EGI is required associated infrastructure to renewable energy projects and therefore relates to the IRP 2010 – 2030, the National Department of Forestry, Fisheries and the Environment (DFFE) has been determined as the Competent Authority in terms of GN R779 of 01 July 2016. Through the decision-making process, the DFFE will be supported by the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (DARDL&EA) as the commenting authority.

1.2. Legal Requirements as per the EIA Regulations, 2014 (as amended) for the undertaking of an Environmental Impact Assessment Report

This EIA Report has been prepared in accordance with the requirements of the EIA Regulations published on 08 December 2014 (and amended on 07 April 2017) promulgated in terms of Chapter 5 of the National Environmental Management Act (Act No 107 of 1998). This chapter of the EIA Report includes the following information required in terms of Appendix 3: Scope of Assessment and Content of Environmental Impact Assessment Reports:

Requirement	Relevant Section
3(1)(a) the details of (i) the EAP who prepared the report and (ii) the expertise of the EAP; including a curriculum vitae	The details of the EAP and the expertise of the EAP have been included in Section 1.5 . The Curriculum vitae of the Savannah Environmental team have been included as Appendix A .
3(1)(b) the location of the development footprint of the activity on the approved site as contemplated in the accepted scoping report, including (i) the 21-digit Surveyor General code of each cadastral land parcel; (ii) where available, the physical address and farm name and (iii) where the required information in items (i) and (ii) is not available, the coordinates of the boundary of the property or properties	The location of the project site proposed for the development of the Umbila Emoyeni EGI is included as Figure 1.1 . The details of the affected properties, including the property names and numbers, as well as the SG-codes are included in Table 1.1 .
3(1)(c) a plan which locates the proposed activity or activities applied for as well as the associated structures and	The locality of the project site is illustrated on a locality map included as Figure 1.1 . The centre

Requirement	Relevant Section
infrastructure at an appropriate scale, or, if it is (i) a linear activity, a description, and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or (ii) on land where the property has not been defined, the coordinates within which the activity is to be undertaken	point co-ordinates of the project site are included in Table 1.1 .

This EIA Report consists of eleven chapters, as follows:

- » **Chapter 1** provides background to the Umbila Emoyeni EGI and the EIA process.
- » **Chapter 2** provides a description of the Umbila Emoyeni EGI.
- » **Chapter 3** provides the site selection information and identified project alternatives.
- » **Chapter 4** outlines the strategic regulatory and legal context for energy planning in South Africa, and specifically for the proposed Umbila Emoyeni EGI.
- » **Chapter 5** describes the need and desirability of the Umbila Emoyeni EGI within the project site.
- » **Chapter 6** outlines the process which was followed during the EIA process.
- » **Chapter 7** describes the existing biophysical and socio-economic environment affected by the proposed Umbila Emoyeni EGI.
- » **Chapter 8** provides a description and assessment of the potential issues associated with the proposed Umbila Emoyeni EGI.
- » **Chapter 9** provides a description and assessment of the potential cumulative issues associated with the proposed Umbila Emoyeni EGI.
- » **Chapter 10** presents the conclusions and recommendations based on the findings of the EIA for the Umbila Emoyeni EGI.
- » **Chapter 11** provides references used in the compilation of the EIA Report.

1.3. Project Overview

A technically feasible project site³, with an extent of ~27 819ha has been identified by Emoyeni Renewable Energy Farm (Pty) Ltd as a technically suitable area for the development of the Umbila Emoyeni Renewable Energy Farm, including the proposed 666MW wind farm, 150MW of solar energy facility and Umbila Emoyeni EGI. The project site comprises numerous properties as listed in **Table 1.1** below.

Table 1.1: Detailed description of the Umbila Emoyeni Renewable Energy Farm project site

Province	Mpumalanga Province	
District Municipality	Gert Sibande District Municipality	
Local Municipality	Govan Mbeki and Lekwa Local Municipalities	
Ward Number (s)	Ward 15 of the Govan Mbeki Local Municipality Ward 12 of the Lekwa Local Municipality	
Nearest town(s)	Richmond (~35km south-west) and Victoria West (~80km south-east)	
Affected Properties⁴:	Parent Farm Number	Farm Portions
	Farm 264 – Geluksplaats	0, 11
	Farm 422 – Klipfontein	6, 8, 9, 12, 13, 14, 16
	Farm 423 – Bekkerust	0, 1, 6, 19
	Farm 456 – Vaalbank	11, 12, 15, 18,

³ The project site is the area with an extent of 27 819ha, within which the Umbila Emoyeni EGI development footprint will be located.

⁴ Refer to Appendix R for SG codes.

	Farm 457 – Roodekrans	0, 1, RE/22, RE/23	
	Farm 458 – Goedgedacht	2, 8, 10, 11, 16, 18, 25, 32, 33	
	Farm 467 – Twee Fontein	1, 6,	
Current zoning	Agriculture		
Site Coordinates (centre of project site)	26°37'3.04"S; 29°36'9.18"E		
Co-ordinates of the MTS	26°38'38.66"S, 29°35'21.91"E		
Co-ordinates of the collector Stations	26°37'6.51"S, 29°35'48.70"E 26°31'24.23"S, 29°35'11.06"E 26°43'46.50"S, 29°40'49.03"E		
Co-ordinates of onsite switching stations	Switching Station	Latitude	Longitude
	WEF 1	26°30'37.40"S	29°35'16.67"E
	WEF 2	26°35'19.49"S	29°37'37.71"E
	WEF 3	26°36'54.24"S	29°36'16.13"E
	Solar PV	26°32'41.73"S	29°34'4.22"E
Start and End coordinates of project site	Start Point		
	Latitude	Longitude	
	26°30'39.96"S	29°35'16.01"E	
	End Point		
	Latitude	Longitude	
	26°43'41.59"S	29°40'39.88"E	

During the Scoping Phase, the full extent of the project site was considered by the specialist assessments, with the aim of determining the suitability from an environmental and social perspective and identifying areas that should be avoided in development planning. Based on the specialist assessments undertaken during the Scoping Phase, areas of environmental sensitivity were identified within the project site. In order to avoid these areas of potential sensitivity and to ensure that potential detrimental environmental impacts are minimised as far as possible, the developer identified a grid connection corridor (300m) within the project site where the grid infrastructure for the Umbila Emoyeni EGI is planned to be constructed. Since the project site assessed during the Scoping Phase is larger than the area required for the grid connection corridor, it provides the opportunity for the optimal placement of the infrastructure, ensuring avoidance of major identified environmental sensitivities.

The grid connection infrastructure will include:

- » A new 400/132 kV Main Transmission Substation (MTS), to be located adjacent to the Camden SOL Overhead Lines (OHLs).
- » New collector stations: each will comprise several incoming 132 kV lines from each project switching station, feeder bays, 132kV bus bars and outgoing line to the MTS.
- » Two 400kV loop-in loop-out OHLs to the existing Camden-Sol 400kV transmission line.
- » On-site switching stations (132kV in capacity) at each renewable energy facility.
- » 132kV power lines from the switching stations to the collector substations and ultimately to a new MTS.
- » On-site IPP substations where the generated power will be transformed from 33 kV to 132 kV so that it can be evacuated to Collector station and MTS
- » Access roads up to 8m wide.

The key infrastructure components proposed as part of the Umbila Emoyeni EGI are described in more detail in Chapter 2 of this EIA Report.

Local level environmental and planning issues have been assessed through the EIA process with the aid of site-specific specialist studies in order to delineate areas of sensitivity within the grid connection corridor. These site-specific specialist studies have assisted in informing and optimising the design of the EGI.

1.4. Overview of the Environmental Impact Assessment (EIA) Process

An EIA is an effective planning and decision-making tool for the project developer as it allows for the identification and management of potential environmental impacts. It provides the opportunity for the developer to be forewarned of potential environmental issues and allows for the resolution of the issues reported on in the Scoping and EIA reports as well as dialogue with interested and affected parties (I&APs).

The EIA process comprises of two (2) phases (i.e., Scoping and EIA) (refer to **Figure 1.2**) and involves the identification and assessment of potential environmental impacts through the undertaking of independent specialist studies, as well as public participation. The processes followed in these two phases is as follows:

- » The **Scoping Phase** includes the identification of potential issues associated with the project through a desktop study (considering existing information), limited field work and consultation with interested and affected parties and key stakeholders. This phase considers the project site in order to identify and delineate any environmental fatal flaws, no-go and / or sensitive areas. Following a public review period of the Scoping report, this phase culminates in the submission of a final Scoping Report and Plan of Study for the EIA to the Competent Authority for consideration and acceptance. The Scoping Report was accepted, and the Plan of Study for the EIA Phase approved by the DFFE on 04 August 2022

- » The **EIA Phase** involves a detailed assessment of the potentially significant positive and negative impacts (direct, indirect, and cumulative) identified in the Scoping Phase. This phase considers a proposed development footprint within the project site and includes detailed specialist investigations as well as public consultation. Following a public review period of the EIA Report, this phase culminates in the submission of a final EIA Report and an Environmental Management Programme (EMPr), including recommendations of practical and achievable mitigation and management measures, to the Competent Authority for final review and decision-making.

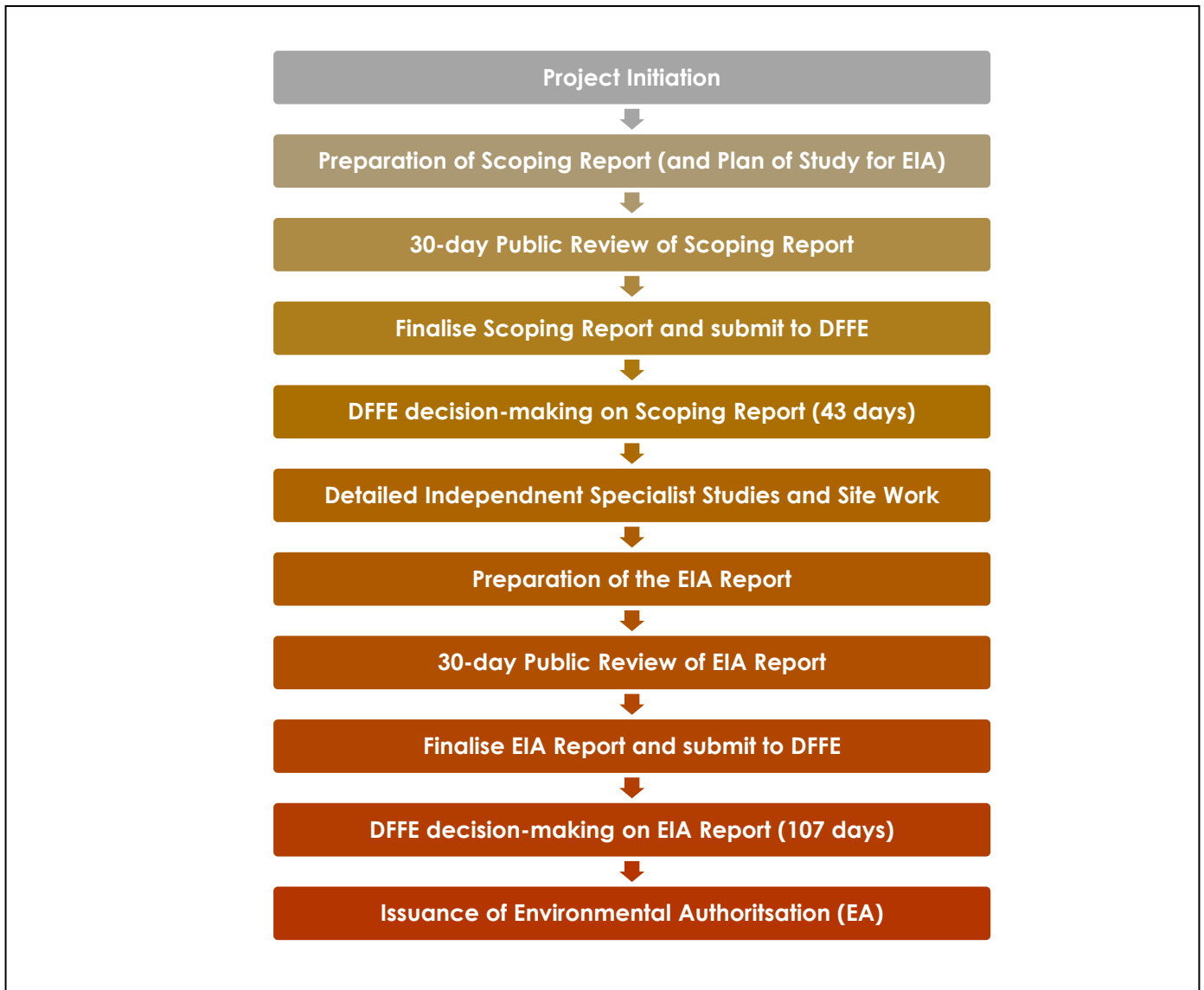


Figure 1.2: Regulated timeframe of an EIA Process

1.5. Details of Environmental Assessment Practitioner and Expertise to conduct the S&EIA Process

In accordance with Regulation 12 of the 2014 EIA Regulations (GNR 326), Emoyeni Renewable Energy (Pty) Ltd has appointed Savannah Environmental (Pty) Ltd as the independent Environmental Consultant responsible for managing the Application for EA and supporting S&EIA process; inclusive of comprehensive, independent specialist studies. The application for EA and S&EIA process will be managed in accordance with the requirements of NEMA, the 2014 EIA Regulations (GNR 326), and all other relevant applicable legislation.

Neither Savannah Environmental, the Environmental Assessment Practitioners (EAPs) employed by the company nor any of the specialists responsible for undertaking studies for this project are subsidiaries or are affiliated to the applicant. Furthermore, Savannah Environmental does not have any interests in secondary developments that may arise out of the authorisation of the proposed facility.

Savannah Environmental is a specialist environmental consulting company providing a holistic environmental management service, including environmental assessment, and planning to ensure

compliance and evaluate the risk of development, and the development and implementation of environmental management tools. Savannah Environmental benefits from the pooled resources, diverse skills and experience in the environmental field held by its team.

The Savannah Environmental team have considerable experience in environmental impact assessment processes and environmental management, and have been actively involved in undertaking environmental studies for a wide variety of projects throughout South Africa, including those associated with electricity generation from renewable energy sources.

- » **Chantelle Geyer**, the principle author of this EIA Report holds a BSc degree in Environmental Science, and a BSc Honours degree in Environmental Geology from the North-West University in Potchefstroom, South Africa. She is a Junior Environmental Consultant and specialises in basic assessments, environmental impact assessments, GIS-mapping, public participation administration, environmental management programmes, and environmental compliance.
- » **Jo-Anne Thomas**, the principle EAP on this project, is a registered EAP with the Environmental Assessment Practitioners Association of South Africa (EAPASA - 2019/726) and a Professional Natural Scientist with the South African Council for Natural Scientific Professions (SACNASP). She provides technical input for projects in the environmental management field, specialising in Strategic Environmental Advice, Environmental Impact Assessment studies, environmental auditing and monitoring, environmental permitting, public participation, Environmental Management Plans and Programmes, environmental policy, strategy and guideline formulation, and integrated environmental management. Her key focus is on integration of the specialist environmental studies and findings into larger engineering-based projects, strategic assessment, and providing practical and achievable environmental management solutions and mitigation measures. Responsibilities for environmental studies include project management (including client and authority liaison and management of specialist teams); review and manipulation of data; identification and assessment of potential negative environmental impacts and benefits; review of specialist studies; and the identification of mitigation measures.
- » **Nicolene Venter**, the principle public participation consultant for this project, is a Board Member of IAPSA (International Association for Public Participation South Africa). She holds a Higher Secretarial Diploma and has over 21 years of experience in public participation, stakeholder engagement, awareness creation processes and facilitation of various meetings (focus group, public meetings, workshops, etc.). She is responsible for project management of public participation processes for a wide range of environmental projects across South Africa and neighbouring countries.

In order to adequately identify and assess potential environmental impacts associated with the proposed Umbila Emoyeni EGI, the following specialist sub-consultants have provided input into this EIA Report:

Specialist	Area of Expertise
Gerhard Botha of Nkurenkuru Ecology and Biodiversity (Pty) Ltd	Ecology
Owen Davies of Arcus Consulting	Avifauna
Jonathan Aronson of Camissa	Bats
Andrew Husted of the Biodiversity Company	Soils and Agricultural Potential
Jon Marshall of Environmental Planning & Design CC	Visual

Specialist	Area of Expertise
Pierre van Jaarsveld of Urban-Econ Development Economist (Pty) Ltd	Socio- Economic
Jenna Lavin of CTS Heritage	Heritage (including Archaeology Palaeontology and Cultural Heritage)
Iris Wink of JG Afrika	Traffic

Appendix A includes the curricula vitae for the environmental assessment practitioners from Savannah Environmental and the specialist consultants.

CHAPTER 2: PROJECT DESCRIPTION

This chapter provides an overview of the Umbila Emoyeni EGI and details the project scope which includes the planning/design, construction, operation, and decommissioning activities required for the development. It must be noted that the project description presented in this Chapter may change to some extent based on the outcomes and recommendations of detailed engineering and other technical studies, the findings and recommendations of the EIA and supporting specialist studies, and any licencing, permitting, and legislative requirements.

2.1 Legal Requirements as per the EIA Regulations, 2014 (as amended), for the undertaking of an Environmental Impact Assessment Report

This chapter of the EIA Report includes the following information required in terms of the EIA Regulations, 2014, as amended - Appendix 3: Scope of Assessment and Content of Environmental Impact Assessment Reports:

Requirement	Relevant Section
3(1)(b) the location of the development footprint of the activity on the approved site as contemplated in the accepted scoping report, including (i) the 21 digit Surveyor General code of each cadastral land parcel, (ii) where available the physical address and farm name and (iii) where the required information in items (i) and (ii) is not available, the coordinates of the boundary of the property or properties.	The location of the proposed project is detailed in Chapter 1, Table 1.1 , as well as Section 2.2.1 below.
3(1)(d)(ii) a description of the scope of the proposed activity, including (ii) a description of the activities to be undertaken including associated structures and infrastructure related to the development.	A description of the activities to be undertaken with the development of project is included in Table 2.1 and Table 2.2 .

2.2 Nature and Extent of the Umbila Emoyeni EGI

As detailed in Chapter 1, the development of the Umbila EGI will enable the evacuation of electricity from the proposed renewable energy facilities which are proposed as part of the Umbila Emoyeni Renewable Energy Farm, which will produce electricity for integration into the national electricity grid and/or for use by private off takers. This infrastructure therefore serves as a grid connection solution for the development of the proposed renewable energy facilities.

2.2.1. Overview of the Project Site

The project is to be developed on a site located approximately 6km south-east of Bethal and 1km east of Morgenon. The project site is located across the Govan Mbeki and Lekwa Local Municipalities within the Gert Sibande District in the Mpumalanga Province. The full extent of the project site (i.e., 27 819ha) has been considered during the Scoping Phase of the EIA process, within which the Umbila Emoyeni EGI will be appropriately located from a technical and environmental sensitivity perspective. The project site consists of numerous properties as listed in **Table 2.1**.

Table 2.1: Properties which the Umbila Emoyeni EGI project site will be located

Parent Farm Number	Farm Portions
Farm 264 – Geluksplaats	0, 11
Farm 422 – Klipfontein	6, 8, 9, 12, 13, 14, 16
Farm 423 – Bekkerust	0, 1, 6, 19
Farm 456 – Vaalbank	11, 12, 15, 18,
Farm 457 – Roodekrans	0, 1, RE/22, RE/23
Farm 458 – Goedgedacht	2, 8, 10, 11, 16, 18, 25, 32, 33
Farm 467 – Twee Fontein	1, 6,

Access to the project site is ample with the presence of existing roads mainly consisting of national and regional roads. The project site is situated directly adjacent to the N17, R35 and R39, which provide DIRECT access to the project site (refer to **Figure 2.1**). Transport of project components would be routine via the N2 highway from the Richards Bay deep-water port, via Ermelo.

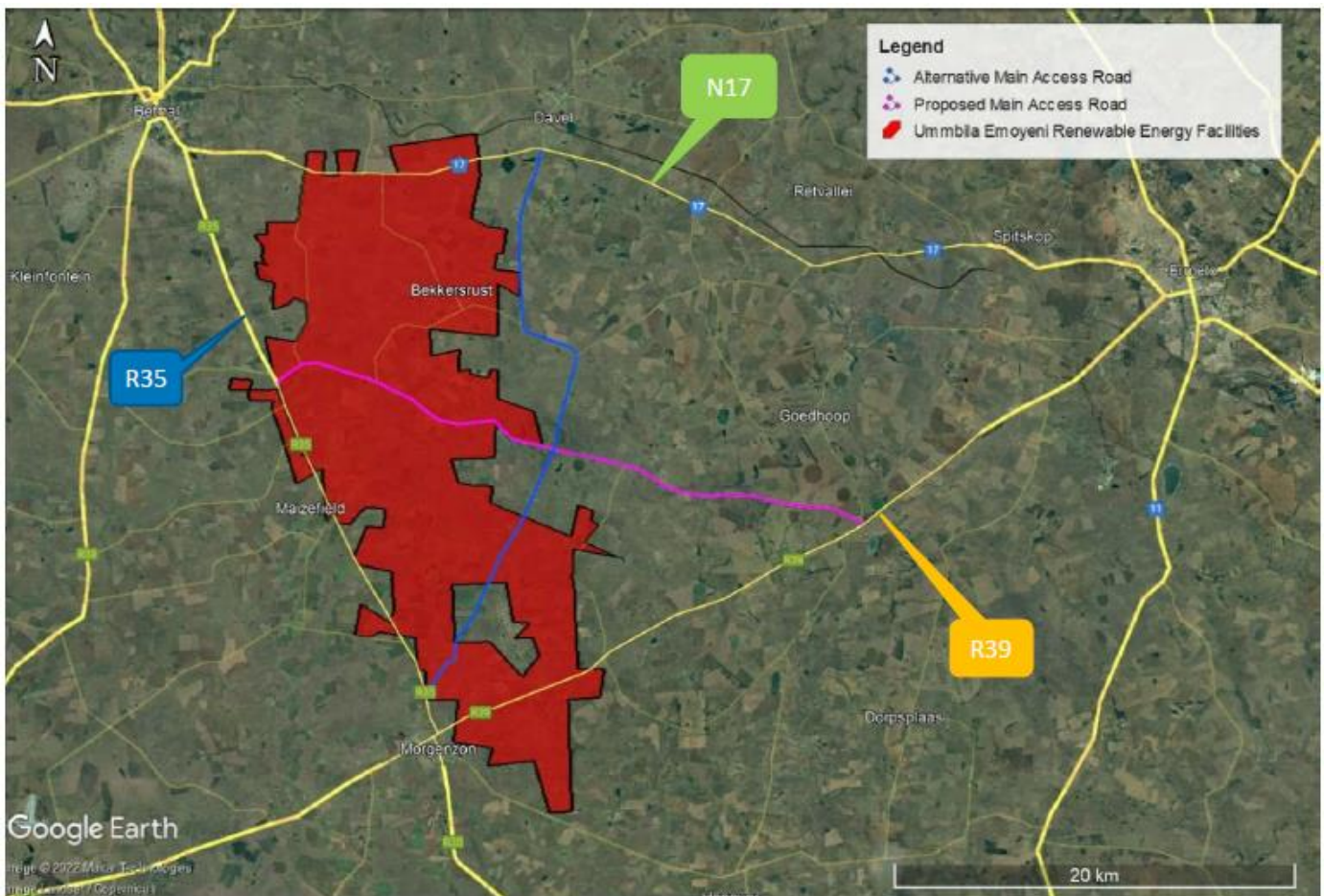


Figure 2.1: Proposed main access roads and alternatives to the project site

2.2.2. Components of the Umbila Emoyeni EGI

The grid connection infrastructure will include:

- » A new 400/132 kV Main Transmission Substation (MTS), to be located adjacent to the Camden SOL Overhead Lines (OHLs).

- » New collector stations: each will comprise several incoming 132 kV lines from each project switching station, feeder bays, 132kV bus bars and outgoing line to the MTS.
- » Two 400kV loop-in loop-out OHLs to the existing Camden-Sol 400kV transmission line.
- » On-site switching stations (132kV in capacity) at each renewable energy facility.
- » 132kV power lines from the switching stations to the collector substations and ultimately to a new MTS.
- » On-site IPP substations where the generated power will be transformed from 33 kV to 132 kV so that it can be evacuated to Collector station and MTS
- » Access roads up to 8m wide.

The 400/132kV MTS will serve as the main point of connection of the renewable energy cluster (wind and solar) and Eskom Transmission infrastructure. This IPP stations will connect to a collector substation via a 132kV line and will then connect to the MTS. This is generally an Eskom requirement in order to stop access into the MTS being constrained. The connection of the proposed 400/132kV MTS to the national grid will be via a new loop-in loop-out 400kV power line that will connect into the existing Camden-Sol 400kV transmission line.

The Eskom Transmission and Distribution grid connection infrastructure required for the proposed project, and which will be constructed as part of this project, as well as the IPP substations will consist of the following:

- a) New Eskom MTS and 400 kV OHL
 - » Footprint will be 600m x 600m
 - » 2 x ± 250 of 400 kV OHL from the Camden-Sol 2 400 kV OHL connected on a loop-in-loop-out basis with typically the same conductor and structure types as the existing infrastructure. The servitude that will be registered will comply with Eskom's requirements and will be 55 m wide;
 - » Platform, control building, fencing, earth mat, lighting, lightning protection and security systems;
 - » 2 x 400 kV bus bars based on breaker-and-a-half configuration;
 - » 1 (or 2) x 500 MVA 400/132/22 kV power transformer;
 - » 2 x 132 kV bus bars with third bypass bus bar;
 - » 2 x 132 kV feeder bays in MTS to collector station;
 - » All associated protection, metering, control, SCADA, automation, DC and AC auxiliary supplies.
- b) 3 x New Eskom Collector Stations
 - » Platform, control building, fencing, earth mat, lighting, lightning protection and security systems;
 - » 1 x 132 kV bus bar with bus section circuit breaker;
 - » various 132 kV feeder bays from MTS;
 - » various 132 kV feeder bays to remote Switching Stations;
 - » 4 x 132 kV IPP feeder bays to onsite IPP S/Ss (2 x IPP feeders to WF 3 and 2 x feeders to WF 4). IPP S/Ss to be adjacent to each other and next to the Eskom Switching Station;
 - » All associated protection, metering, control, SCADA, automation, DC and AC auxiliary supplies.
- c) Various new Eskom Switching Stations (multiple switching stations will be constructed):
 - » Platform, control building, fencing, earth mat, lighting, lightning protection and security systems;
 - » 1 x 132 kV bus bars with bus section circuit breaker;
 - » 1 x 132 kV feeder bay from remote Collector Station;
 - » Various 132 kV IPP feeder bays to onsite IPP S/Ss (2 x IPP feeders to WF 1 and 2 x feeders to WF 2). IPP S/Ss to be adjacent to each other and next to the Eskom Switching Station;
 - » All associated protection, metering, control, SCADA, automation, DC and AC auxiliary supplies.
- d) Various new IPP Substations, each with:
 - » Platform, control building, fencing, earth mat, lighting, lightning protection and security systems;
 - » 2 x 90 MVA 132/33 kV power transformers with NEC/R/T;

- » Medium Voltage indoor GIS switchgear;
- » Reactive power compensation devices (if required for Grid Code compliance);
- » All associated protection, metering, control, SCADA, automation, DC and AC auxiliary supplies.

A summary of the details and dimensions of the planned infrastructure associated with the project is provided in **Table 2.2**.

Table 2.2: Details or dimensions of typical infrastructure required for the Umbila Emoyeni EGI

Infrastructure	Footprint and dimensions
Onsite IPP substations	<ul style="list-style-type: none"> » Development footprint: 4 IPP substations of 5ha each » Capacity: 33kV/132kV
Onsite switching stations	<ul style="list-style-type: none"> » Development footprint: 4 Switching stations of 5ha each » Capacity: 132kV
3 x Collector Sub Stations	<ul style="list-style-type: none"> » Development footprint: 300 m x 300 m » Capacity: 132 kV
132kV power lines	<ul style="list-style-type: none"> » Servitude width: 31m » Height: up to 40m » Length: 40km » Corridor width for assessment in EIA: 300m
Main Transmission Substation	<ul style="list-style-type: none"> » Development footprint: 600m x 600m » Capacity: 400/132kV » Height: Up to 70m, this would include a microwave telecoms tower
Power line connection to national grid	<ul style="list-style-type: none"> » Capacity and circuit: 400kV loop-in loop-out » Servitude: 55m per line (i.e. 110m in total) » Height: Up to 50m » Corridor width for assessment in EIA: 600m
Height of the power line towers (pylons)	40m
Access and internal roads	<p>Access will likely be via the main road between Bethal and Morgenon. This is the R35, a tarred and provincial road. Existing roads on the affected properties will be used where feasible and practical to provide direct access to the EGI. Where necessary, new access roads (up to 12 wide) will be established to provide access to the Main Transmission Substation (MTS).</p> <p>During construction, a permanent access road along the length of the power line corridor (300m wide) between 4 -6m wide will be established to allow for large crane movement. This track will then be utilised for maintenance during operation.</p>
Temporary infrastructure	Temporary infrastructure, including laydown areas and a concrete batching plant, will be required during the construction phase. All temporary infrastructure will be rehabilitated following the completion of the construction phase, where it is not required for the operation phase.

Table 2.3 provides details regarding the requirements and the activities to be undertaken during the Umbila Emoyeni EGI development phases (i.e., construction phase, operation phase and decommissioning phase).

2.2.3 Project Development Phases Associated with the Umbila Emoyeni EGI

Table 2.3: Details of the Umbila Emoyeni EGI project development phases (i.e., construction, operation, and decommissioning)

Construction Phase	
Requirements	<ul style="list-style-type: none"> » The duration of the construction phase for the 400kV MTS and associated power lines will be dependent on the authorisation for the renewable energy facilities it will cater for. » Create direct construction employment opportunities. Up to 50 employment opportunities will be created during the construction phase and will mainly consist of highly skilled positions due to the complexity of the construction of the proposed grid connection infrastructure. Additional non-skilled labour opportunities of up to 100 will also be created during the construction of the MTS (specifically for civils work such as foundations and drainage and earth moving etc.) » No on-site labour camps. Employees to be accommodated in the nearby towns such as Bethal or Morgenzon and transported to and from site on a daily basis by bus. » Overnight on-site worker presence would be limited to security staff. » Waste removal and sanitation will be undertaken by a sub-contractor, where possible. Waste containers, including containers for hazardous waste, will be located at easily accessible locations /turbine positions on site when construction activities are undertaken. » Electricity required for construction activities will be generated by a generator. Where low voltage connections are possible, these will be considered. » Either via borehole / municipal / dam or a combination of all 3 will be used to provide water. Should water availability at the time of construction be limited, water will be transported to site via water tanks. Water will be used for sanitation and potable water on site as well as construction works.
Activities to be undertaken	
Conduct surveys prior to construction	<ul style="list-style-type: none"> » Including, but not limited to a geotechnical survey, site survey (including the location of the onsite substations, MTS and power line servitudes) and all other associated infrastructure. » Search and rescue of floral species of concern (where required) and the identification and excavation of any sites of cultural/heritage value (where required) within the onsite substation and MTS footprints and the power line servitudes.
Establishment of access roads to the Site	<ul style="list-style-type: none"> » Access roads/tracks to be established for construction and/or maintenance activities required, up to 8m in width. » Existing access roads will be utilised, where possible, to minimise impact. It is unlikely that access roads will need to be upgraded as part of the proposed development.
Construction sequence - substation	<p>Substations are constructed in the following simplified sequence:</p> <ul style="list-style-type: none"> » Step 1: Conduct geotechnical investigations to determine founding conditions. » Step 2: Conduct site survey. » Step 3: Vegetation clearance and construction of access road. » Step 4: Site grading and levelling. » Step 5: Construction of substation platform » Step 6: Construction of foundations. » Step 7: Import of substation components.

	<ul style="list-style-type: none"> » Step 8: Construction of substation. » Step 9: Rehabilitation of disturbed area and protection of erosion sensitive areas. » Step 10: Testing (including quality control) and commissioning (in consultation with the switching specialist).
Construction sequence – power lines	<p>Overhead power lines are constructed in the following simplified sequence:</p> <ul style="list-style-type: none"> » Step 1: Surveying of the development corridor and negotiating with affected landowners. » Step 2: Final design and micro-siting of the infrastructure based on geo-technical, topographical conditions and potential environmental sensitivities; obtain required environmental permits (such as biodiversity permits, heritage permits & WUL/GA). » Step 3: Vegetation clearance and construction of access roads/tracks (where required). » Step 4: Construction of tower foundations. » Step 5: Assembly and erection of infrastructure within and along the corridor. » Step 6: Stringing of conductors. » Step 7: Rehabilitation of disturbed areas. » Step 8: Continued maintenance.
Undertake site rehabilitation	<ul style="list-style-type: none"> » Commence with rehabilitation efforts once construction completed in an area, and all construction equipment is removed. » On commissioning, access points to the site not required during the operation phase will be closed and prepared for rehabilitation.
<u>Operation Phase</u>	
Requirements	<ul style="list-style-type: none"> » Duration will be 20-30 years. » Requirements for security and maintenance of the project. » Employment opportunities relating mainly to operation activities and maintenance. » Current land-use activities, i.e., grazing, can continue in the areas adjacent to the infrastructure.
Activities to be undertaken	
Operation and Maintenance	<ul style="list-style-type: none"> » Part-time security and maintenance staff. » Disposal of waste products (e.g., oil) in accordance with relevant waste management legislation. » On-going rehabilitation of those areas which were disturbed during the construction phase. » During this operation phase vegetation around the MTS and the power line will require management only if it impacts on the safety and operational objectives of the project.
<u>Decommissioning Phase</u>	
Requirements	<ul style="list-style-type: none"> » Decommissioning of the Umbila Emoyeni EGI at the end of its economic life. » Potential for component replacement, depending on the condition of the infrastructure at the time and the need to extend its life. » Expected lifespan of approximately 20 - 30 years (with maintenance) before decommissioning is required. » Decommissioning activities to comply with the legislation relevant at the time.

Activities to be undertaken	
Site preparation	<ul style="list-style-type: none"> » Confirming the integrity of site access to accommodate the required equipment and machinery. » Mobilisation of construction equipment.
Disassemble and remove turbines	<ul style="list-style-type: none"> » Infrastructure components will be disassembled and reused and recycled (where possible). » Where components cannot be reused or recycled, these will be disposed of in accordance with the regulatory requirements at the time of decommissioning. » Disturbed areas, where infrastructure has been removed, will be rehabilitated, if required, and depending on the future land-use of the affected areas and the relevant legislation applicable at the time of decommissioning.
Components to be disposed of or recycled	<ul style="list-style-type: none"> » Foundation concrete will undergo crushing and be used as combined base/wearing course » Electrical components » Reinforcing steel will go through cleansing and milling to re-melt the components

It is expected that the areas of the project site affected by the grid infrastructure (development footprint) will revert back to their original land-use (i.e. agriculture) once the Umbila Emoyeni EGI has reached the end of its economic life and all infrastructure has been decommissioned.

CHAPTER 3: CONSIDERATION OF ALTERNATIVES

This Chapter provides an overview of the various alternatives considered for the Umbila Emoyeni EGI as part of the S&EIA Process.

3.1 Legal Requirements as per the EIA Regulations, 2014 (as amended) for the undertaking of an Environmental Impact Assessment Report

This chapter of the EIA Report includes the following information required in terms of Appendix 3: Scope of Assessment and Content of Environmental Impact Assessment Reports:

Requirement	Relevant Section
3(1)(g) a motivation for the preferred development footprint within the approved site as contemplated in the accepted scoping report.	The identification and motivation for the preferred project site, the development footprint within the project site, the proposed activity and the proposed technology is included in Sections 3.3.1, 3.3.3 and 3.3.4.
3(1)(h)(i) details of the development footprint alternatives considered.	The details of all alternatives considered as part of the Umbila Emoyeni EGI are included in Sections 3.3.1 – 3.3.5.
3(1)(h)(ix) if no alternative development footprint for the activity were investigated, the motivation for not considering such.	The site selection process followed by the developer in order to identify the preferred project site and development footprint is described in Section 3.3.1.
3(1)(h)(x) a concluding statement indicating the location of the preferred alternative development footprint within the approved site as contemplated in the accepted scoping report.	Where no alternatives have been considered, motivation has been included. This is included in Section 3.3.

3.2 Alternatives Considered during the S&EIA Process

In accordance with the requirements of Appendix 3 of the 2014 EIA Regulations (GNR 326), reasonable and feasible alternatives including but not limited to site and technology alternatives, as well as the “do-nothing” alternative should be considered. Several other renewable energy facilities are planned within the broader study area, supporting the suitability of the area for renewable energy projects.

The DFFE Guideline for determining alternatives states that the key criteria for consideration when identifying alternatives are that they should be “practicable”, “feasible”, “relevant”, “reasonable” and “viable”. Essentially there are two types of alternatives:

- » Incrementally different (modifications) alternatives to the project.
- » Fundamentally (totally) different alternatives to the project.

In this instance, 'the project' refers to Umbila Emoyeni EGI, which is proposed to cater for renewable energy facilities proposed as part of the Umbila Emoyeni Renewable Energy Farm and enable grid connection for the evacuation of the electricity to be developed by an Independent Power Producer (IPP) and intended to provide electricity to the national electricity grid and/or private off-takers. Furthermore, it must be noted that the proposed grid connection infrastructure, once constructed, will be handed over to Eskom. During operation, should sufficient capacity exist, this capacity may be available to other IPPs who

would need to go through the normal Eskom Cost Estimate Letter (CEL) process in order to connect. This infrastructure will therefore be of value to Eskom and the country.

3.2.1 Consideration of Fundamentally Different Alternatives

Fundamentally different alternatives are usually assessed at a strategic level and, as a result, project specific EIAs are therefore limited in scope and ability to address fundamentally different alternatives. At a strategic level, electricity generating alternatives have been addressed as part of the DMRE's current Integrated Resource Plan for Electricity 2010 – 2030 (IRP)⁵, and will continue to be addressed as part of future revisions. In this regard, the need for renewable energy power generation from renewable energy facilities has been identified as part of the technology mix for power generation in the country for the next 20 years. The Umbila Emoyeni EGI will enable the evacuation of the generated electricity into the national grid for use and therefore supports the development of renewable energy projects.

The fundamental energy generation alternatives were assessed and considered within the development of the IRP and the need for the development of renewable energy projects (including the associated required grid connection solutions) has been defined. Therefore, fundamentally different alternatives to the proposed project are not considered within this EIA process.

3.2.2 Consideration of Incrementally Different Alternatives

Incrementally different alternatives relate specifically to the project under investigation. "Alternatives", in relation to a proposed activity, means different ways of meeting the general purposes and requirements of the activity, which may include alternatives for:

- » The properties on which, or location where the activity is proposed to be undertaken.
- » The type of activity to be undertaken.
- » The design or layout of the activity.
- » The technology to be used in the activity.
- » The operational aspects of the activity.

In addition, the option of not implementing the activity (i.e., the "do-nothing" alternative) must also be considered.

The sections below describe the incrementally different alternatives being considered as part of the Umbila Emoyeni EGI. Where no alternative is being considered, a motivation has been provided as required by the EIA Regulations, 2014, as amended.

3.3 Project Alternatives under Consideration for the Umbila Emoyeni EGI

3.3.1 Property or Location Alternatives

The development site identified for the Umbila Emoyeni EGI is located ~6km south-east of Bethal and 1km east of Morgenzon. The preferred project site was identified through an investigation of prospective sites and properties in the area within the Mpumalanga Province. The investigation involved the consideration

⁵ The Integrated Resource Plan (IRP) is legislated policy which regulates power generation planning.

of specific characteristics that play a role in the opportunities and limitations for the development of grid connection infrastructure required to connect renewable energy facilities to the national electricity grid. These are discussed in the sections below.

- » **Land Availability:** In order to develop the Umbila Emoyeni EGI, sufficient space is required. The preferred project site was identified within the Mpumalanga Province and in the Bethal / Morgenzon area following the confirmation of the renewable energy resources for which the EGI will provide a grid connection solution. The properties included in the project site are privately-owned parcels available in the area for a development of this nature through agreement with the landowners, and are deemed technically feasible by the project developer for such development to take place. The combination of the affected properties has an extent of ~27 819ha, which was considered by the developer as sufficient for the development of the Umbila Emoyeni EGI, including for the location of the MTS on the Camden SOL Lines. A development footprint within the project site for the placement of infrastructure has been identified considering environmental constraints and sensitivities identified within the project site through the Scoping Evaluation and is being assessed as part of this EIA Report.
- » **Land Use, Geographical and Topographical Considerations:** The character of the greater area surrounding the project site can be described as natural grassland which is interspersed with areas of cultivation. Main crop types include sunflower seed production, sorghum, rye and potatoes. Settlement occurs in the form of isolated homesteads throughout the study area that are generally related to agricultural uses. There is a tourism related establishment (Silver Water Game Lodge) located within the north-eastern section of the proposed site. This facility appears to be focused around a dam. Settlement in the form of towns and villages is limited. The closest towns include Morgenzon, Bethal and Ermelo. Other disturbance visible is mining infrastructure, a railway track and power lines.

Based on the location of the project site within an area where supporting transmission and distribution infrastructure is readily available to enable connection of the Umbila Emoyeni EGI to the national grid and the suitable and preferable topography present, the site was identified as being technically preferred for the planned development. Furthermore, Eskom has confirmed the feasibility of the location of the MTS between Camden and Sol Substations within the CEL issued to the applicant.

- » **Existing infrastructure:** The availability of existing road and grid connection infrastructure was also considered by the developer in determining the location for the placement of the MTS and power lines, as this will enable the use of infrastructure already available and reduce the disturbance associated with the construction of the associated infrastructure and connection to the grid. Access to the project site is ample with the presence of existing roads mainly consisting of national and regional roads. The proposed site is bounded by the N17 to the north, the R39 to the east and south and the R35 to the west.

Based on the above considerations, the Umbila Emoyeni EGI project site was identified by the developer as being the most technically feasible and viable project site within the broader area for further investigation in support of an application for authorisation. As a result, no property/location alternatives are proposed as part of this S&EIA process.

3.3.2. Design and Layout Alternatives

The full extent of the development area has been considered within the Scoping Report through site-specific specialist studies with the aim of determining the suitability from an environmental and social perspective

and identifying areas that should be avoided in development planning. Within this identified development area, a development footprint for the substations and corridors for the power lines will be defined for assessment in the EIA Phase. An overall environmental sensitivity map has been provided in order to illustrate the sensitive environmental features located within the project site which need to be considered and, in some instances completely avoided by the development footprint (refer to Chapter 10).

Following the confirmation of the Umbila Emoyeni EGI preferred project site as being technically feasible for the development for grid connection infrastructure, the developer commenced with the scoping assessment of the site to evaluate the main constraints and opportunities and determine whether or not there are any fatal flaws or significant no-go areas within the site that might compromise or limit the development of the Umbila Emoyeni EGI. The scoping process included specialist investigations of the project site based on desktop studies and where possible, field assessments. The purpose of this phase of the project was to identify sensitive and no-go areas, as well as to determine appropriate buffers to be considered within the development of the project layout. The sensitivity spatial data as compiled by the specialist team during the Scoping Phase for the project site was provided to the applicant for consideration in developing a layout for the EGI infrastructure.

Through integration of the specialist sensitivity data obtained, based on field-survey and desktop studies, as well as consideration of technical aspects, the developer designed the layout to avoid areas and features of high environmental sensitivity. This is a common approach in the development of renewable energy and EGI projects in order to inform the placement of infrastructure for further investigation in the EIA Phase. Where avoidance was not possible, appropriate mitigation and management measures (in this instance the development of technical mitigation solutions as well as recommendations from the various environmental specialists) have been proposed for implementation during the construction and operation of the proposed grid connection infrastructure. This has resulted in the consideration of a development footprint as part of the EIA process which is designated to be environmentally appropriate as far as possible.

An overall environmental sensitivity map has been provided in order to illustrate the sensitive environmental features located within the project site which needs to be considered and, in some instances completely avoided by the development footprint (refer to Chapter 10).

3.3.3. Activity and Technology Alternatives

The activity proposed to be implemented and the technology proposed to be developed (i.e., construction and operation of onsite substations, 132kV power lines, a 400kV MTS and 400kV power lines) is linked to the grid connection infrastructure required to evacuate the generated renewable electricity from the proposed renewable energy facilities. The activity is therefore specific to the technical requirements of the proposed renewable energy facilities. The development of the Umbila Emoyeni EGI is considered to be the most appropriate and efficient solution for the evacuation of the generated electricity from the renewable energy facilities which are proposed as part of the Umbila Emoyeni Renewable Energy Farm.

No technology alternatives exist for similar large-scale distribution and switching of electricity, with conductor and substation technology having been refined for numerous years by Eskom and employed throughout the country. As such, the selected technology is regarded the most suitable and appropriate for this development type, and no further technology alternative is assessed for the project as part of this S&EIA process.

3.3.5. The 'Do-Nothing' Alternative

The 'do-nothing' alternative is the option of not constructing and operating the Umbila Emoyeni EGI. Should this alternative be selected, there would be no environmental impacts or benefits as a result of construction and operation activities associated with the grid connection infrastructure. The 'do-nothing' alternative will therefore likely result in minimising the cumulative impact on land, although it is expected that pressure to develop the site for renewable energy purposes will be actively pursued due to the same factors which make the site a viable option for renewable energy development. The 'do-nothing' alternative has been assessed as part of the EIA Phase (refer to Chapter 8 and 10 of this EIA Report).

CHAPTER 4: POLICY AND LEGISLATIVE CONTEXT

This Chapter provides an overview of the policy and legislative context within which the development of grid connection infrastructure, such as the Umbila Emoyeni EGI, is proposed. It identifies environmental legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this activity and are to be considered in the assessment process which may be applicable to or have bearing on the proposed project.

4.1 Legal Requirements as per the EIA Regulations, 2014 (as amended) for an Environmental Impact Assessment Report

This chapter of the EIA Report includes the following information required in terms of the EIA Regulations, 2014 - Appendix 3: Scope of Assessment and Content of Environmental Impact Assessment Reports:

Requirement	Relevant Section
3(1)(e) a description of the policy and legislative context within which the development and how the proposed development complies with and responds to the legislation and policy context.	Chapter 5 as a whole provides an overview of the policy and legislative context which is considered to be associated with the development of the Umbila Emoyeni EGI. The regulatory and planning context has been considered at national, provincial and local levels.

4.2. Strategic Electricity Planning in South Africa

The need to expand electricity generation capacity in South Africa is based on national policy and informed by on-going strategic planning undertaken by the DMRE. The hierarchy of policy and planning documentation that support the development of renewable energy projects such as the Umbila Emoyeni EGI is illustrated in **Figure 4.1**. These policies are discussed in more detail in the following sections, along with the provincial and local policies or plans that have relevance to the development of the proposed project.

The South African energy industry is evolving rapidly, with regular changes to legislation and industry role-players. The regulatory hierarchy for an energy generation project of this nature consists of three tiers of authority who exercise control through both statutory and non-statutory instruments – that is National, Provincial and Local levels.

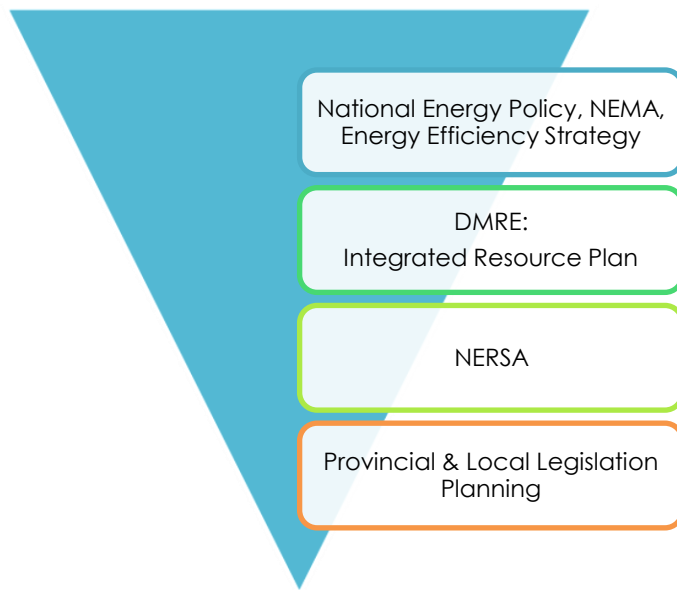


Figure 4.1: Hierarchy of electricity and planning documents

At **National Level**, the main regulatory agencies are:

- » **Department of Mineral Resources and Energy (DMRE):** This Department is responsible for policy relating to all energy forms and for compiling and approving the Integrated Resource Plan (IRP) for electricity. Furthermore, the Department is also responsible for granting approvals for the use of land which is contrary to the objects of the Mineral and Petroleum Resource Development Act (Act No. 28 of 2002) (MPRDA) in terms of Section 53 of the Act. Therefore, in terms of the Act, approval from the Minister is required to ensure that the proposed activities do not sterilise mineral resources that may occur within the project site and development area.
- » **National Energy Regulator of South Africa (NERSA):** NERSA is responsible for regulating all aspects of the electricity sector and will ultimately issue licenses for IPP projects to generate electricity.
- » **Department of Forestry, Fisheries and the Environment (DFFE):** This Department is responsible for environmental policy and is the controlling authority in terms of NEMA and the EIA Regulations, 2014 (GN R326) as amended. DFFE is the Competent Authority for this project (as per GN R779 of 01 July 2016), and is charged with granting the EA for the project under consideration. This Department is also responsible for issuing permits for impacts on protected trees.
- » **The South African Heritage Resources Agency (SAHRA):** SAHRA is a statutory organisation established under the National Heritage Resources Act (No. 25 of 1999) (NHRA), as the national administrative body responsible for the protection of South Africa's cultural heritage.
- » **South African National Roads Agency Limited (SANRAL):** This Agency is responsible for the regulation and maintenance of all national road routes.
- » **Department of Water and Sanitation (DWS):** This Department is responsible for effective and efficient water resource management to ensure sustainable economic and social development. This Department is also responsible for evaluating and issuing licenses pertaining to water use (i.e., Water Use License (WUL) and General Authorisation).
- » **The Department of Agriculture, Rural Development and Land Reform (DARDLR):** This Department is the custodian of South Africa's agricultural resources and is primarily responsible for the formulation and implementation of policies governing the agriculture sector. Furthermore, the Department is also

responsible for issuing permits for the disturbance or destruction of protected tree species listed under Section 15 (1) of the National Forest Act (No. 84 of 1998) (NFA).

At **Provincial Level**, the main regulatory agencies are:

- » **Provincial Government of Mpumalanga – Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (DARDL&EA):** This Department is the commenting authority for the EIA process for the project and is responsible for issuing of biodiversity and conservation-related permits.
- » **Mpumalanga Department of Public Works, Roads and Transport:** This Department provides effective co-ordination of crime prevention initiatives, provincial police oversight, traffic management and road safety towards a more secure environment.
- » **Mpumalanga Provincial Heritage Resource Authority (MPHRA):** This Department identifies, conserves and manages heritage resources throughout the Mpumalanga Province.

At the **Local Level**, the local and district municipal authorities are the principal regulatory authorities responsible for planning, land use and the environment. In the Mpumalanga Province, both the local and district municipalities play a role. The project site is located across the **Govan Mbeki and Lekwa Local Municipalities** within the **Gert Sibande District**. In terms of the Municipal Systems Act (No. 32 of 2000), it is compulsory for all municipalities to go through an Integrated Development Planning (IDP) process to prepare a five-year strategic development plan for the area under their control.

4.3. International Policy and Planning Context

A brief review of the most relevant international policies relevant to the establishment of the Umbila Emoyeni EGI are provided below in **Table 4.1**. The Umbila Emoyeni EGI is considered to be aligned with the aims of these policies, even if contributions to achieving the goals therein are only minor.

Table 4.1: International policies relevant to the Umbila Emoyeni EGI

Relevant policy	Relevance to the Umbila Emoyeni EGI
United Nations Framework Convention on Climate Change (UNFCCC) and Conference of the Party (COP)	<p>The Conference of the Parties (COP), established by Article 7 of the UNFCCC, is the supreme body and highest decision-making organ of the Convention. It reviews the implementation of the Convention and any related legal instruments and takes decisions to promote the effective implementation of the Convention.</p> <p>The Conference of the Parties (COP) 21 was held in Paris from 30 November to 12 December 2015. From this conference, an agreement to tackle global warming was reached between 195 countries.</p> <p>South Africa signed the Agreement in April 2016 and ratified the agreement on 01 November 2016. The Agreement was assented to by the National Council of Provinces on 27 October 2016, and the National Assembly on 1 November 2016.</p> <p>The Paris Agreement set out that every 5 years countries must set out increasingly ambitious climate action. This meant that, by 2020, countries needed to submit or update their plans for reducing emissions, known as nationally determined contributions (NDCs). The</p>

Relevant policy	Relevance to the Umbila Emoyeni EGI
	<p>COP26 summit held on 2021 brought parties together to accelerate action towards the goals of the Paris Agreement and the UN Framework Convention on Climate Change. On 13 November 2021, COP26 concluded in Glasgow with all countries agreeing the Glasgow Climate Pact to keep 1.5°C alive and finalise the outstanding elements of the Paris Agreement.</p> <p>South Africa's National Climate Change Response Policy (NCCRP) establishes South Africa's approach to addressing climate change, including adaptation and mitigation responses. The NCCRP formalises Government's vision for a transition to a low carbon economy, through the adoption of the 'Peak, Plateau and Decline' (PPD) GHG emissions trajectory whereby South Africa's emissions should peak between 2020 and 2025, plateau for approximately a decade, and then decline in absolute terms thereafter, and based on this the country has pledged to reduce emissions by 34% and 42% below Business As Usual (BAU) emissions in 2020 and 2025, respectively.</p> <p>The policy provides support for the Umbila Emoyeni EGI which will contribute to managing climate change impacts, supporting the emergency response capacity, as well as assist in reducing GHG emissions in a sustainable manner.</p>
<p>The Equator Principles IV (October 2020)</p>	<p>The Equator Principles (EPs) IV constitute a financial industry benchmark used for determining, assessing, and managing project's environmental and social risks when financing projects. The EPs are primarily intended to provide a minimum standard for due diligence to support responsible risk decision-making. The EPs are applicable to large infrastructure projects (such as the Umbila Emoyeni EGI) and apply globally to all industry sectors.</p> <p>Such an assessment should propose measures to minimise, mitigate, and offset adverse impacts in a manner relevant and appropriate to the nature and scale of the Umbila Emoyeni EGI. In terms of the EPs, South Africa is a non-designated country, and as such the assessment process for projects located in South Africa evaluates compliance with the applicable IFC Performance Standards on Environmental and Social Sustainability, and Environmental Health and Safety (EHS) Guidelines.</p> <p>The Umbila Emoyeni EGI is currently being assessed in accordance with the requirements of the 2014 EIA Regulations, as amended (GN R326), published in terms of Section 24(5) of the National Environmental Management Act (No. 107 of 1998) (NEMA), which is South Africa's national legislation providing for the authorisation of certain controlled activities. Through this assessment, all potential social and environmental risks are identified and assessed, and appropriate mitigation measures proposed.</p>
<p>International Finance Corporation (IFC) Performance Standards and Environmental and Social Sustainability (January 2012)</p>	<p>The International Finance Corporation's (IFC) Performance Standards (PSs) on Environmental and Social Sustainability were developed by the IFC and were last updated on 1 January 2012.</p>

Relevant policy	Relevance to the Umbila Emoyeni EGI
	<p>Performance Standard 1 requires that a process of environmental and social assessment be conducted, and an Environmental and Social Management System (ESMS) appropriate to the nature and scale of the project, and commensurate with the level of its environmental and social risks and impacts, be established and maintained. The above-mentioned standard is the overarching standard to which all the other standards relate. Performance Standards 2 through to 8 establish specific requirements to avoid, reduce, mitigate, or compensate for impacts on people and the environment, and to improve conditions where appropriate. While all relevant social and environmental risks and potential impacts should be considered as part of the assessment, the standards 2 and 8 describe potential social and environmental impacts that require particular attention specifically within emerging markets. Where social or environmental impacts are anticipated, the developer is required to manage them through its ESMS consistent with Performance Standard 1.</p> <p>Given the nature of the Umbila Emoyeni EGI, it is anticipated (at this stage of the process) that Performance Standards 1, 2, 3, 4, 6, and 8 may be applicable to the project.</p>

4.4. National Policy and Planning Context

Further to the South African government's commitment in August 2011 to support the development of renewable energy capacity, the DMRE initiated the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP) to procure renewable energy from the private sector in a series of rounds. According to the IPP Procurement Programme overview report (2021), as at March 2021, 6 422MW of renewable energy capacity from 112 independent power producers (IPPs) has been procured in seven bid rounds⁶, with 5 078MW from 79 IPP projects operational and made available to the grid⁷. National policies have to be considered for the construction and operation of the EGI to ensure that the development is in line with the planning of the country.

A brief review of the most relevant national policies is provided below in **Table 4.2**. The development of Umbila Emoyeni EGI is considered to align with the aims of these policies, even where contributions to achieving the goals therein are only minor.

Table 4.2: Relevant national legislation and policies for Umbila Emoyeni EGI

Relevant legislation or policy	Relevance to Umbila Emoyeni EGI
Constitution of the Republic of South Africa, 1996	Section 24 of the Constitution pertains specifically to the environment. It states that everyone has the right to an environment that is not harmful to their health or well-being, and to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that prevent pollution and ecological degradation, promote conservation and secure ecologically

⁶ Bid windows 1, 2, 3, 3.5, 4 and small BW1(1S2) and small BW2(2S2). 2 583 MW of renewable energy capacity was awarded to IPPs in the REIPPPP bid window 5 in October 2021.

⁷<https://www.cliffedekkerhofmeyr.com/en/news/publications/2019/Corporate/energy-alert-22-october-The-Integrated-Resource-Plan-2019-A-promising-future-roadmap-for-generation-capacity-in-South-Africa.html>

Relevant legislation or policy	Relevance to Umbila Emoyeni EGI
	<p>sustainable development, and use of natural resources while promoting justifiable economic and social development.</p> <p>The Constitution outlines the need to promote social and economic development. Section 24 of the Constitution therefore requires that development be conducted in such a manner that it does not infringe on an individual's environmental rights, health, or well-being. This is especially significant for previously disadvantaged individuals who are most at risk to environmental impacts. The undertaking of an EIA process for the proposed project in terms of the requirements of the EIA Regulations, 2014 (as amended) aims to minimise any impacts on the natural and social environment.</p>
<p>National Environmental Management Act (No. 107 of 1998) (NEMA)</p>	<p>The NEMA is South Africa's key piece of environmental legislation and sets the framework for environmental management in South Africa. The NEMA is founded on the principle that everyone has the right to an environment that is not harmful to their health or well-being as contained within the Bill of Rights.</p> <p>The national environmental management principles state that the social, economic, and environmental impacts of activities, including disadvantages and benefits, must be considered, assessed, and evaluated, and decisions must be appropriate in the light of such consideration and assessment.</p> <p>The need for responsible and informed decision-making by government on the acceptability of environmental impacts is therefore enshrined within the NEMA.</p>
<p>National Energy Act (No. 34 of 2008)</p>	<p>The purpose of the National Energy Act (No. 34 of 2008) is to ensure that diverse energy resources are available, in sustainable quantities and at affordable prices, to the South African economy in support of economic growth and poverty alleviation, while taking into account environmental management requirements and interactions amongst economic sectors, as well as matters relating to renewable energy. The National Energy Act also provides for energy planning, increased generation and consumption of renewable energies, contingency energy supply, holding of strategic energy feedstocks and carriers, adequate investment in, appropriate upkeep and access to energy infrastructure. The Act provides measures for the furnishing of certain data and information regarding energy demand, supply, and generation, and for establishing an institution to be responsible for promotion of efficient generation and consumption of energy and energy research.</p> <p>The Act provides the legal framework which supports the development of power generation facilities.</p>
<p>White Paper on the Energy Policy of the Republic of South Africa (1998)</p>	<p>The White Paper on Energy Policy places emphasis on the expansion of energy supply options to enhance South Africa's energy security. This can be achieved through increased use of renewable energy and encouraging new entries into the generation market.</p> <p>The policy states that the advantages of renewable energy include, minimal environmental impacts during operation in comparison with traditional supply technologies, generally lower running costs, and high labour intensities. Disadvantages include higher capital costs in some cases, lower energy densities, and lower levels of availability, depending on specific conditions, especially with sun and wind-based systems. Nonetheless, renewable resources generally operate from an unlimited resource base and, as such, can increasingly contribute towards a long-term sustainable energy future.</p>

Relevant legislation or policy	Relevance to Umbila Emoyeni EGI
<p>White Paper on the Renewable Energy Policy of the Republic of South Africa (2003)</p>	<p>The White Paper on Renewable Energy Policy supplements Government's predominant policy on energy as set out in the White Paper on the Energy Policy of the Republic of South Africa (DME, 1998). The policy recognises the potential of renewable energy and aims to create the necessary conditions for the development and commercial implementation of renewable energy technologies.</p> <p>The White Paper on Renewable Energy sets out Government's vision, policy principles, strategic goals, and objectives for promoting and implementing renewable energy in South Africa. The country relies heavily on coal to meet its energy needs due to its abundant, and fairly accessible and affordable coal resources. However, massive renewable energy resources that can be sustainable alternatives to fossil fuels, have so far remained largely untapped. The development of additional renewable energy projects will promote the use of the abundant South African renewable energy resources and contribute to long-term energy security and diversification of the energy mix.</p>
<p>The Electricity Regulation Act (No. of 2006)</p>	<p>The Electricity Regulation Act of 2006 replaced the Electricity Act (No. 41 of 1987), as amended, with the exception of Section 5B, which provides funds for the energy regulator for the purpose of regulating the electricity industry. The Act establishes a national regulatory framework for the electricity supply industry and introduces the National Energy Regulator (NERSA) as the custodian and enforcer of the National Electricity Regulatory Framework. The Act also provides for licences and registration as the manner in which the generation, transmission, distribution, trading, and import and export of electricity are regulated.</p>
<p>National Development Plan 2030</p>	<p>The National Development Plan (NDP) 2030 is a plan prepared by the National Planning Commission in consultation with the South African public which is aimed at eliminating poverty and reducing inequality by 2030.</p> <p>In terms of the Energy Sector's role in empowering South Africa, the NDP envisages that, by 2030, South Africa will have an energy sector that promotes:</p> <ul style="list-style-type: none"> » Economic growth and development through adequate investment in energy infrastructure. The sector should provide reliable and efficient energy service at competitive rates, while supporting economic growth through job creation. » Social equity through expanded access to energy at affordable tariffs and through targeted, sustainable subsidies for needy households. » Environmental sustainability through efforts to reduce pollution and mitigate the effects of climate change. <p>In formulating its vision for the energy sector, the NDP took the IRP 2010 as its point of departure. Therefore, although electricity generation from coal is still seen as part of the energy mix within the NDP, the plan sets out steps that aim to ensure that, by 2030, South Africa's energy system will look very different to the current situation: coal will contribute proportionately less to primary-energy needs, while gas and renewable energy resources – especially wind, solar, and imported hydroelectricity – will play a much larger role.</p> <p>The NDP aims to provide a supportive environment for growth and development, while promoting a more labour-absorbing economy. The development of Umbila Emoyeni EGI supports the NDP through the development of energy-generating infrastructure</p>

Relevant legislation or policy	Relevance to Umbila Emoyeni EGI
	<p>which will not lead to the generation of GHGs and will result in economic development and growth of the area surrounding the development area.</p>
<p>Integrated Energy Plan (IEP), November 2016</p>	<p>The purpose and objectives of the Integrated Energy Plan (IEP) are derived from the National Energy Act (No. 34 of 2008). The IEP takes into consideration the crucial role that energy plays in the entire economy of the country and is informed by the output of analyses founded on a solid fact base. It is a multi-faceted, long-term energy framework which has multiple aims, some of which include:</p> <ul style="list-style-type: none"> » To guide the development of energy policies and, where relevant, set the framework for regulations in the energy sector. » To guide the selection of appropriate technologies to meet energy demand (i.e., the types and sizes of new power plants and refineries to be built and the prices that should be charged for fuels). » To guide investment in and the development of energy infrastructure in South Africa. » To propose alternative energy strategies which are informed by testing the potential impacts of various factors such as proposed policies, introduction of new technologies, and effects of exogenous macro-economic factors. <p>A draft version of the IEP was released for comment on 25 November 2016. The purpose of the IEP is to provide a roadmap of the future energy landscape for South Africa which guides future energy infrastructure investments and policy development. The development of the IEP is an ongoing continuous process. It is reviewed periodically to take into account changes in the macroeconomic environment, developments in new technologies and changes in national priorities and imperatives, amongst others.</p> <p>The 8 key objectives of the integrated energy planning process are as follows:</p> <ul style="list-style-type: none"> » Objective 1: Ensure security of supply. » Objective 2: Minimise the cost of energy. » Objective 3: Promote the creation of jobs and localisation. » Objective 4: Minimise negative environmental impacts from the energy sector. » Objective 5: Promote the conservation of water. » Objective 6: Diversify supply sources and primary sources of energy. » Objective 7: Promote energy efficiency in the economy. » Objective 8: Increase access to modern energy.
<p>Integrated Resource Plan for Electricity (IRP) 2010-2030</p>	<p>The Integrated Resource Plan (IRP) for Electricity 2010 – 2030 is a subset of the IEP and constitutes South Africa's National electricity plan. The primary objective of the IRP is to determine the long-term electricity demand and detail how this demand should be met in terms of generating capacity, type, timing, and cost. The IRP also serves as input to other planning functions, including amongst others, economic development and funding, and environmental and social policy formulation.</p> <p>The promulgated IRP 2010–2030 identified the preferred generation technology required to meet expected demand growth up to 2030. It incorporated government objectives such as affordable electricity, reduced greenhouse gas (GHG) emissions, reduced water consumption, diversified electricity generation sources, localisation and regional development. The need for a Just Transition to a sustainable, low carbon and equitable energy system is also recognised.</p>

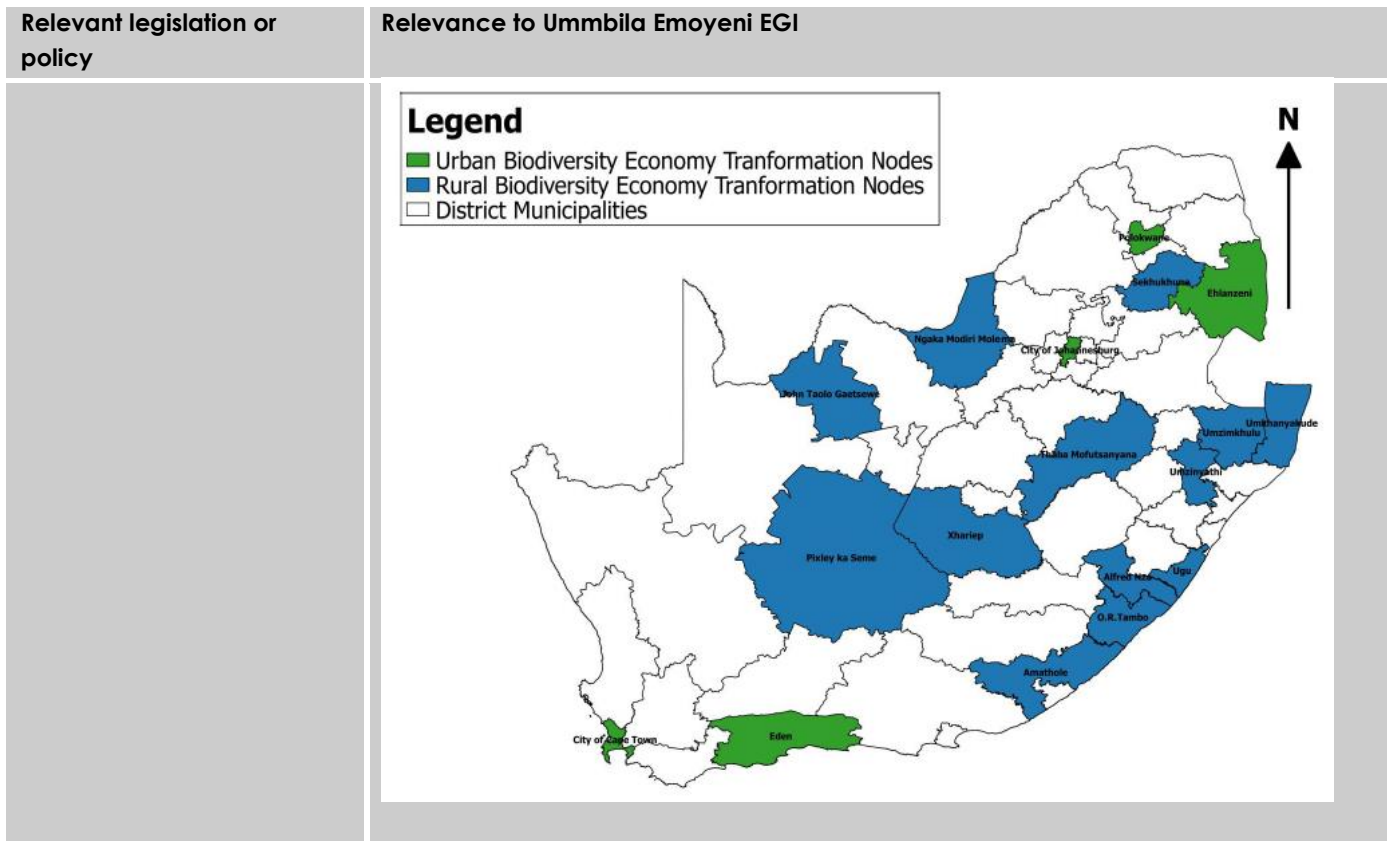
Relevant legislation or policy	Relevance to Umbila Emoyeni EGI
	<p>Following the promulgation of the IRP 2010–2030, implementation followed in line with Ministerial Determinations issued under Section 34 of the Electricity Regulation (Act No. 4) of 2006. The Ministerial Determinations give effect to planned infrastructure by facilitating the procurement of the required electricity capacity.</p> <p>According to the IPP Procurement Programme overview report (2021), as at 31 March 2021, a total of 6 422MW has been procured under the REIPPP Programme from 112 IPPs in seven bid rounds, with 5 078MW being currently operational and made available to the grid. IPPs have commissioned 1005MW from two (2) Open Cycle Gas Turbines (OCGT) peaking plants.</p> <p>Under the Eskom Build Programme, 1 332MW has been procured from the Ingula Pumped Storage Project, 1 588MW and 800MW from the Medupi and Kusile power stations and 100MW from the Sere Wind Farm.</p> <p>Provision has been made for the following new capacity by 2030:</p> <ul style="list-style-type: none"> » 1 500MW of coal » 2 500MW of hydro » 6 000MW of solar PV » 14 400MW of wind » 1 860MW of nuclear » 2 088MW of storage » 3 000MW of gas/diesel » 4 000MW from other distributed generation, co-generation, biomass and landfill technologies <p>Based on the IRP 2019, 1 474MW has been installed for solar PV facilities, whereas, 814MW has already been procured. In addition, 1 600MW has been allocated for wind facilities from 2022 to 2030. This will bring the total installed capacity of solar PV facilities by 2030 to 17 742MW. Therefore, the development of the Umbila Emoyeni EGI is supported by the IRP 2019.</p>
<p>New Growth Path (NGP) Framework, 23 November 2010</p>	<p>The purpose of the New Growth Path (NGP) Framework is to provide effective strategies towards accelerated job-creation through the development of an equitable economy and sustained growth. The target of the NGP is to create 5 million jobs by 2020; with economic growth and employment creation as the key indicators identified in the NGP. The framework seeks to identify key structural changes in the economy that can improve performance in terms of labour absorption and the composition and rate of growth.</p> <p>To achieve this, government will seek to, amongst other things, identify key areas for large-scale employment creation, as a result of changes in conditions in South Africa and globally, and to develop a policy package to facilitate employment creation in these areas.</p>
<p>National Climate Change Bill, 2018</p>	<p>On 08 June 2018, the Minister of Environmental Affairs published the National Climate Change Bill ("the Bill") for public comment. The Bill provides a framework for climate change regulation in South Africa aimed at governing South Africa's sustainable transition to a climate resilient, low carbon economy and society. The Bill provides a procedural outline that will be developed through the creation of frameworks and plans.</p>

Relevant legislation or policy	Relevance to Umbila Emoyeni EGI
	<p>Umbila Emoyeni EGI is a renewable energy generation facility and would not result in the generation or release of emissions during its operation.</p>
<p>National Climate Change Response Policy, 2011</p>	<p>South Africa's National Climate Change Response Policy (NCCRP) establishes South Africa's approach to addressing climate change, including adaptation and mitigation responses. The NCCRP formalises Government's vision for a transition to a low carbon economy, through the adoption of the 'Peak, Plateau and Decline' (PPD) GHG emissions trajectory whereby South Africa's emissions should peak between 2020 and 2025, plateau for approximately a decade, and then decline in absolute terms thereafter, and based on this, the country has pledged to reduce emissions by 34% and 42% below Business As Usual (BAU) emissions in 2020 and 2025, respectively.</p> <p>As an integral part of the policy, a set of near-term priority flagship programmes will be implemented to address the challenges of climate change, one of which includes the Renewable Energy Flagship Programme. This flagship programme includes a scaled-up renewable energy programme, based on the current programme specified in the IRP 2010, and using the evolving South African Renewables Initiative led by the Department of Public Enterprise and Department of Trade and Industry (DTI), as a driver for the deployment of renewable energy technologies. The programme will be informed by enhanced domestic manufacturing potential and the implementation of energy efficiency and renewable energy plans by local government.</p> <p>The development of the Umbila Emoyeni EGI is aligned with the Renewable Energy Flagship Programme identified under South Africa's NCCRP and could therefore be argued to be aligned with the country's approach to addressing climate change.</p>
<p>National Climate Change Response Strategy for South Africa, 2004</p>	<p>The need for a national climate change policy for South Africa was identified as an urgent requirement during the preparations for the ratification of the UNFCCC in 1997. A process to develop such a policy was thus instituted under the auspices of the National Committee for Climate Change (NCCC), a non-statutory stakeholder body set up in 1994 to advise the Minister on climate change issues and chaired by the then Department of Environmental Affairs and Tourism (DEAT). It was determined that a national climate change response strategy will promote integration between the programmes of the various government departments involved to maximise the benefits to the country as a whole, while minimising negative impacts. Further, as climate change response actions can potentially act as a significant factor in boosting sustainable economic and social development, a national strategy specifically designed to bring this about is clearly in the national interest, supporting the major objectives of the government, including poverty alleviation and the creation of jobs.</p> <p>A number of principles and factors guided the conception of the strategy and are required to be implemented. These are:</p> <ul style="list-style-type: none"> » Ensuring that the strategy is consistent with national priorities, including poverty alleviation, access to basic amenities including infrastructure development, job creation, rural development, foreign investment, human resource development and improved health, leading to sustainable economic growth. » Ensuring alignment with the need to consistently use locally available resources. » Ensuring compliance with international obligations.

Relevant legislation or policy	Relevance to Umbila Emoyeni EGI
	<ul style="list-style-type: none"> » Recognizing that climate change is a cross cutting issue that demands integration across the work programmes of other departments and stakeholders, and across many sectors of industry, business, and the community. » Focussing on those areas that promote sustainable development. » Promoting programmes that will build capacity, raise awareness, and improve education in climate change issues. » Encouraging programmes that will harness existing national technological competencies. » Reviewing the strategy constantly in the light of national priorities and international trends. » Recognizing that South Africa's emissions will continue to increase as development is realised. <p>The strategy was devised through an integrated approach and considers policies and programmes of other government departments and the fact that South Africa is a developing country. This will ensure that the principles of sustainable development are adequately served and do not conflict with existing development policies.</p>
<p>Just Transition Framework for South Africa (June 2022) - A Presidential Climate Commission Report</p>	<p>The Presidential Climate Commission (PCC) is a multi-stakeholder body established by the President of the Republic of South Africa to (1) advise on the country's climate change response and (2) support a just transition to a low-carbon climate-resilient economy and society. The PCC facilitates dialogue between social partners on these issues—defining the type of economy and society the country wants to achieve, and detailed pathways for how to get there.</p> <p>One of the first tasks of the PCC was to design a just transition framework for South Africa. In December 2020, President Cyril Ramaphosa created the PCC to oversee and facilitate a just transition to a low-emissions and climate-resilient economy. The just transition framework is the first building block towards this objective, bringing coordination and coherence to just transition planning in the country. The just transition framework sets out a shared vision for the just transition, principles to guide the transition, and policies and governance arrangements to give effect to the transition.</p> <p>The Just Transition Framework builds on research, policies, and consultations on the just transition in South Africa, as well as international best practice guidelines.</p> <p>The Just Transition Framework sets out a shared vision for the just transition, principles to guide the transition, and policies and governance arrangements to give effect to the transition from an economy that is predominantly reliant on fossil-fuel based energy, towards a low-emissions and climate-resilient economy. The framework is a planning tool for achieving a just transition in South Africa, setting out the actions that the government and its social partners will take to achieve a just transition, and the outcomes to be realised in the short, medium, and long term.</p>
<p>Strategic Integrated Projects (SIPs)</p>	<p>The Presidential Infrastructure Coordinating Committee (PICC) is integrating and phasing investment plans across 18 Strategic Infrastructure Projects (SIPs) which have five core functions: to unlock opportunity, transform the economic landscape, create new jobs, strengthen the delivery of basic services, and support the integration of African economies. A balanced approach is being fostered through greening of the economy, boosting energy security, promoting integrated municipal infrastructure investment, facilitating integrated urban development, accelerating skills</p>

Relevant legislation or policy	Relevance to Umbila Emoyeni EGI
	<p>development, investing in rural development, and enabling regional integration. SIP 8 and 9 of the energy SIPs supports the development of the EGI:</p> <ul style="list-style-type: none"> » SIP 8: Green energy in support of the South African economy: Support sustainable green energy initiatives on a national scale through a diverse range of clean energy options as envisaged in the Integrated Resource Plan (IRP 2010 – 2030) and supports bio-fuel production facilities. » SIP 9: Electricity generation to support socio-economic development: The proposed Umbila Emoyeni EGI is a potential SIP 9 Project as electricity will be generated and social and economic upliftment, development and growth will take place within the surrounding communities. It would become a SIP 9 project if selected as a Preferred Bidder project by the Department Mineral Resources and Energy. SIP 9 supports the acceleration of the construction of new electricity generation capacity in accordance with the IRP 2010 to meet the needs of the economy and address historical imbalances. <p>The Umbila Emoyeni EGI could be registered as a SIP project once it is under development. The project would then contribute to the above-mentioned SIPs.</p>
<p>National Biodiversity Economy Strategy (NBES) (March 2016)</p>	<p>The biodiversity economy of South Africa encompasses the businesses and economic activities that either directly depend on biodiversity for their core business or that contribute to conservation of biodiversity through their activities. The commercial wildlife and the bioprospecting industries of South Africa provide cornerstones for the biodiversity economy and are the focus of this strategy.</p> <p>Both the wildlife and bioprospecting sub-sectors of the biodiversity economy have already demonstrated the potential for significant future development and growth. In the study commissioned on the situational analysis of the biodiversity economy, the contribution of the biodiversity economy to the national economy can be measured in terms of Gross Domestic Product (GDP), with the wildlife and bioprospecting industries contributing approximately R3 billion to GDP in 2013. Growth in the wildlife and bioprospecting industries can make a significant impact on the national economy, while contributing to national imperatives such as job creation, rural development and conservation of our natural resources.</p> <p>The Wildlife Industry value chain is centred on game and wildlife farming/ranching activities that relate to the stocking, trading, breeding, and hunting of game, and all the services and goods required to support this value chain. The key drivers of this value chain include domestic hunters, international hunters and a growing retail market demand for wildlife products such as game meat and taxidermy products. This sector is therefore characterised by an interesting combination of agriculture, eco-tourism and conservation characteristics.</p> <p>Over the period 2008-2013, the total Wildlife Industry market grew by more than 14% per year. This growth comprised an average annual growth exceeding 6% in domestic hunting, a decrease in international hunting, and an exponential growth in live auction sales. It is considered likely that the consolidated Wildlife Industry has the potential to experience a weighted average annual growth rate of between 4 %-14 % per year up to 2030.</p>

Relevant legislation or policy	Relevance to Umbila Emoyeni EGI
	<p>In order for the wildlife and bioprospecting sub-sectors of the biodiversity economy to achieve its full potential, a strategic partnership between the state, private sector and communities is required. To this end, a National Biodiversity Economy Strategy (NBES) is required to guide the sustainable growth of the wildlife and bioprospecting industries and to provide a basis for addressing constraints to growth, ensuring sustainability, identifying clear stakeholder's responsibilities and monitoring progress of the Enabling Actions.</p> <p>The Vision of NBES is to optimise the total economic benefits of the wildlife and bioprospecting industries through its sustainable use, in line with the Vision of the Department of Environmental Affairs. The purpose of NBES is to provide a 14-year national coordination, leadership and guidance to the development and growth of the biodiversity economy.</p> <p>NBES has set an industry growth goal stating that by 2030, the South African biodiversity economy will achieve an average annualised GDP growth rate of 10% per annum. This envisioned growth curve extends into the year 2030 and is aligned to the efforts of the country's National Development Plan, Vision 2030. The NBES seeks to contribute to the transformation of the biodiversity economy in South Africa through inclusive economic opportunities, reflected by a sector which is equitable - equitable access to resources, equitable and fair processes and procedures and equitable in distribution of resources (i.e. business, human, financial, indigenous species, land, water) in the market.</p> <p>To address these transformation NBES imperatives, NBES has the principles of:</p> <ul style="list-style-type: none"> » Conservation of biodiversity and ecological infrastructure » Sustainable use of indigenous resources » Fair and equitable beneficiation » Socio-economic sustainability » Incentive driven compliance to regulation » Ethical practices » Improving quality and standards of products. <p>The NBES provides the opportunity to redistribute South Africa's indigenous biological/genetic resources in an equitable manner, across various income categories and settlement areas of the country. The NBES has prioritised nodes in the country for biodiversity economy transformation, referred to as BET nodes. NBES prioritises 18 BET nodes, 13 rural and 5 urban districts across the nine provinces of the country, with communities having been prioritised for development of small and medium size enterprises and community-based initiatives which sustainably use of indigenous biological and/or genetic resources. The Gert Sibande District Municipality within which the Umbila Emoyeni EGI is proposed is not identified as a priority area.</p>



4.5. Provincial Policy and Planning Context

A brief review of the most relevant provincial policies is provided below in **Table 4.3**. The proposed development is considered to align with the aims of these policies, even if contributions to achieving the goals therein are only minor.

Table 4.3: Relevant provincial legislation and policies for Umbila Emoyeni EGI

Relevant legislation or policy	Relevance to the Umbila Emoyeni EGI
Mpumalanga Vision, 2030 (2013 – 2030)	<p>The Mpumalanga Vision 2030 Strategic Implementation Framework (2013 - 2030) was established as a direct implementation response to the National Development Plan Vision, 2030. The framework describes the province’s approach to realising the objectives of the NDP in the provincial context and seeks to achieve the MPGs Provincial Strategic Objectives (PSOs). Mpumalanga Vision, 2030 provides a provincial expression of the key priorities, objectives and targets that enumerated in the NDP and expressed within the policy. It seeks to present and affirm the province’s approach towards realising the national vision and development plan. The implementation framework builds on and informs past and existing sectorial and related planning interventions within the province. The Vision 2030 Implementation Framework provides a basis for prioritisation during medium-term and annual planning cycles. The focus of the Mpumalanga Vision 2030 is to provide a summary overview on the facilitation of decision-making and the prioritisation of rolling back poverty, and inequality by raising living standards to an acceptable minimum, which entails a combination of interventions directed at increasing employment, improving the quality of education, productive growth, a social wage and good quality public services.</p>

Relevant legislation or policy	Relevance to the Umbila Emoyeni EGI
	<p>In line with the principles of the NDP, the Vision 2030 highlights socio-economic outcomes such as employment and economic growth as priorities. The Mpumalanga Vision 2030 document formulated a spatial rationale for the province, which is based on nine key drivers, of which key drivers 1 to 6 are focused towards promoting economic development and job creation; key drivers 7 and 8 are focused on human development; and key driver 9 is focused on the conservation and sustainable management of the natural environment. Of relevance to the Umbila Emoyeni EGI are key drivers 1 to 6 as the development of the facility will promote economic development and job creation.</p>
<p>Mpumalanga Economic Growth and Development Path (2011)</p>	<p>The Mpumalanga Economic Growth and Development Path (MEGDP) is informed by the National Economic Growth Path. According to the MEGDP, the Mpumalanga Province is committed to increasing local economic development and job creation in the agricultural, industrial, manufacturing, green economy, tourism, and mining sectors. The focal point of the Economic Growth and Development Path is the creation of appropriate labour absorbing jobs which will have a positive direct, indirect, and induced effects on the Provincial economy and the living standards of its people.</p> <p>The primary objective of the MEGDP is to grow the economy of the province; balance growth and development in order to creates jobs, reduce poverty and inequality, and improve the socio-economic conditions of the province.</p> <p>The Mpumalanga economic growth and development path also discusses climate change and the green economy as one of the focus areas where government will a prioritise effort to support employment creation. The Industrial Development Corporation (IDC) estimates that 296 000 jobs can be created over a ten-year period through investment in green energy alone. R11.7 billion will be invested in green energy. Government is developing an Integrated Resource Plan for energy that will have clear commitments on the level of green energy and renewable energy. A commitment must be made on procurement that favours the local industry. A higher level of skills will also be needed. Small business policies and regulation of the building industry will need to be considered.</p> <p>The proposed development falls directly in line with the Mpumalanga provincial growth path with regards to employment creation in the renewable energy industry, the benefits it will bring to the local community as well as contributing towards diversifying the local economy towards a greener economy.</p>
<p>Mpumalanga Spatial Development Framework (2013)</p>	<p>The Mpumalanga Spatial Development Vision for the future functional spatial development patterns is based on the integration of sustainable natura resources, economic development and job creation and human development to provide: <i>a sustainable urban and rural spatial development pattern focussed on a modern ecologically sustainable economy, supported by a suitably skilled labour force and providing for quality of living.</i></p> <p>Strategic requirements which need to be addressed include the following:</p> <ul style="list-style-type: none"> » Harnessing the opportunities provided by urbanisation forces to achieve effective rural development. » Adopting a flexible approach which suits the province and enables sustainable development rather than inhibits growth and development. » Creating world class infrastructure, services and amenities to attract investment.

Relevant legislation or policy	Relevance to the Umbila Emoyeni EGI
	<ul style="list-style-type: none"> » Integrated infrastructure development planning responding to long term forecasted requirements. » Pro-active planning which integrates aspiring economic activities into the mainstream economies and urban fabric. » Safeguarding existing resources and creating opportunities for renewable energy development. » Consensus on where to develop and not develop the province. » Connecting the spatial frameworks to catalytic programmes of the Mpumalanga Implementation Framework and Plan. » Creating opportunities for increased international, national, provincial and municipal connectivity, linked by strategic transportation routes in the province. » Achieving improved quality of life in our settlements through formalisation, provision of planned amenities and consolidation of land uses. » Gearing up of spatial planning capacity, skills, systems, and procedures to achieve the vision. <p>The development of Umbila Emoyeni EGI supports the Mpumalanga Spatial Development Framework as it is grid connection infrastructure to support a renewable energy development and will as such assist the province towards achieving its goal of creating opportunities for renewable energy development.</p>
<p>Mpumalanga Biodiversity Sector Plan (2014)</p>	<p>The Mpumalanga Biodiversity Sector Plan (MBSP) is a guideline which is part of a wider set of national biodiversity planning tools and initiatives that are designed for national legislation and policy. It also guides as a spatial tool to inform permissible land uses that support biodiversity and ecological processes. The MBSP contains various classes of environmental features of conservation value, such as protected areas, irreplaceable areas etc.</p> <p>Mapping of critical biodiversity areas is also provided in this document. According to the map of terrestrial critical biodiversity areas contained in the MBSP, the Mpumalanga Province comprises five areas, namely, protected areas, critical biodiversity areas (optimal and irreplaceable), ecological support areas, other natural areas, and moderately or heavily modified areas.</p> <p>According to the Mpumalanga Biodiversity Sector Plan, the project area overlaps with CBA1: Optimal (Terrestrial) and CBA1: Irreplaceable (Freshwater) areas.</p>
<p>Mpumalanga Draft Green Economy Sector Plan, 2016</p>	<p>The Plan aims to provide an integrated approach towards developing the green economy in Mpumalanga by 2030 in line with the Vision 2030. Specific objectives include:</p> <ul style="list-style-type: none"> » Developing a sector plan based on the province's strengths in natural resources endowments » Expanding on the economic, green and environmental initiatives that are already underway in the province in order to facilitate quick wins » Support the DEDT's drive in sustainable economic development – Develop an action plan for implementation
<p>Mpumalanga Tourism and Parks Agency Strategic Plan, 2011</p>	<ul style="list-style-type: none"> » The strategic plan emphasises that Mpumalanga possesses significant potential to capture large numbers of international and domestic tourists. In particular, the Kruger National Park, several other reserves, natural and cultural and historical heritage are attractions that are in demand by all tourist groups. » The plan states that the environmental sector often puts much emphasis on biodiversity conservation without necessarily linking it with eco-tourism. The plan

Relevant legislation or policy	Relevance to the Umbila Emoyeni EGI
	states that much naivety has been observed about what ecotourism can do. The plan calls for improved implementation of policy that will see biodiversity promotion being embraced by the broader tourism industry and the need for improved awareness from players within the sector to reduce the adverse environmental impacts of tourism.

4.6. Local Policy and Planning Context

The local tiers of government relevant to the Umbila Emoyeni EGI are the Govan Mbeki and Lekwa Msukaligwa Local Municipalities all of which fall within the Gert Sibande District. Instruments and/or policies at both the district and local level contain objectives which align with the development of Umbila Emoyeni EGI. These include, economic growth, job creation, community upliftment and poverty alleviation.

Table 4.4: Relevant local legislation and policies for Umbila Emoyeni EGI

Relevant policy	Relevance to Umbila Emoyeni EGI
Gert Sibande District Municipality IDP 2021	<ul style="list-style-type: none"> » The Gert Sibande District IDP acknowledges green economy development as a primary objective as per the MEGDP. The IDP further states that investment in research for new technologies will be prioritised. » The IDP identifies the need in enhancing green economy to improve service delivery in all its seven local municipalities. » Interventions to facilitate growth and job creation in the manufacturing sector includes: <ul style="list-style-type: none"> * Supporting the development of clean forms of energy like wind and hydro power generations opportunities » The IDP indicated the following issues/strategic objectives in terms of electricity supply: <ul style="list-style-type: none"> * Eradication of the remaining backlogs * Create capacity to accommodate new developments
Govan Mbeki Local Municipality, LED 2014	<ul style="list-style-type: none"> » The LED indicates side linkage opportunities such as new energy sources (preferably renewable energy such as solar and wind) » Also mentioned in the LED is rural economic sector development with renewable energy as an opportunity. » Renewable energy is listed as and economic sector that the local municipality should focus on.
Govan Mbeki Local Municipality, IDP 2021	<ul style="list-style-type: none"> » One of the strategic goals identified by the IDP is renewable energy and energy efficiency. » The IDP states that the phasing in of renewable energy options, which include concentrated solar power, wind and natural gas, will reduce dependence on coal resources. » THE IDP indicated that the local municipality support the transition to a low-carbon economy by speeding up and expanding renewable energy implementation.
Lekwa Local Municipality, IDP 2021	<ul style="list-style-type: none"> » The IDP indicated that the electricity and energy department should develop and adopt by laws that promote renewable energy and energy efficiency. » Green Economy initiatives to mitigate the negative impact of climate change & create new green job opportunities is seen as a priority area within the local municipality.

CHAPTER 5: NEED AND DESIRABILITY

Appendix 3 of the 2014 EIA Regulations (GNR 326) requires that an EIA Report includes a motivation for the need and desirability of the proposed development, including the need and desirability of the activity in the context of the preferred location. The need and desirability of the development needs to consider whether it is the right time and the right place for locating the type of land-use/activity being proposed. The need and desirability of a proposed development is, therefore, associated with the wise use of land, and should be able to respond to questions such as, but not limited to, what the most sustainable use of the land may be.

This Chapter provides an overview of the need and desirability, and perceived benefits of the project specifically.

5.1. Legal Requirements as per the EIA Regulations, 2014 (as amended), for the undertaking of an Environmental Impact Assessment Report

This chapter includes the following information required in terms of Appendix 3: Scoping of Assessment and Content of Environmental Impact Assessment Reports:

Requirement	Relevant Section
3(1)(f) a motivation for the need and desirability for the proposed development including the need and desirability of the activity in the context of the preferred development footprint within the approved site as contemplated in the accepted scoping report.	The need and desirability for the development of the Umbila Emoyeni EGI is included and discussed as a whole within this chapter. The need and desirability for the development of the EGI has been considered from an international, national, regional, and site-specific perspective.

5.2. Need and Desirability from an International Perspective

The need and desirability of the Umbila Emoyeni EGI (and the renewable energy facilities it will cater for), from an international perspective, can be described through the project's alignment with internationally recognised and adopted agreements, protocols, and conventions. South Africa is a signatory to a number of international treaties and initiatives, including the United Nation's Development Programme's (UNDP's) Sustainable Development Goals (SDGs). The SDGs address global socio-economic challenges such as poverty, hunger, health, education, climate change, gender equality, water, sanitation, energy, urbanisation, environment, and social justice. The SDGs consist of 17 global goals set by the United Nations. The 17 SDGs are characterised by 169 targets, and 304 indicators.

Goal 7 of the SDGs relates to "Affordable and Clean Energy", with the aim of the goal being to ensure access to affordable, reliable, sustainable, and modern energy for all. The following targets and indicators have been set for Goal 7:

Targets	Indicators
7.1 By 2030, ensure universal access to affordable, reliable and modern energy services.	7.1.1 Proportion of population with access to electricity. 7.1.2 Proportion of population with primary reliance on clean fuels and technology.

Targets		Indicators	
7.2	By 2030, increase substantially the share of renewable energy in the global energy mix.	7.2.1	Renewable energy share in the total final energy consumption.
7.3	By 2030, double the global rate of improvement in energy efficiency.	7.3.1	Energy intensity measured in terms of primary energy and GDP.
7.A	By 2030, enhance international cooperation to facilitate access to clean energy research and technology, including renewable energy, energy efficiency and advanced and cleaner fossil-fuel technology, and promote investment in energy infrastructure and clean energy technology.	7.A.1	Mobilised amount of United States dollars per year starting in 2020 accountable towards the \$100 billion commitment.
7.B	By 2030, expand infrastructure and upgrade technology for supplying modern and sustainable energy services for all in developing countries, in particular least developed countries, small island developing States, and land-locked developing countries, in accordance with their respective programmes of support.	7.B.1	Investments in energy efficiency as a percentage of GDP and the amount of foreign direct investment in financial transfer for infrastructure and technology to sustainable development services.

The development of the Umbila Emoyeni EGI would support the proposed renewable energy facilities proposed as part of the Umbila Emoyeni Renewable Energy Farm, which would contribute positively towards Goal 7 (and specifically 7.2.1) of the SDGs through the following means:

- » By generating up to 816MW (combined contracted capacity) of affordable and clean energy (wind and solar).
 - * A study published by the CSIR on 14 October 2016 ("Cost of new power generators in South Africa Comparative analysis based on recent Independent Power Producer (IPP) announcements", Dr Tobias Bischof-Niemz and Ruan Fourie) which took into consideration the results of the cost prices bid successfully under the Department of Mineral Resources and Energy's Renewable Energy (RE) IPP and Coal Baseload IPP Procurement Programmes, found that solar PV and wind were 40% cheaper than new baseload coal (i.e. R0.62/kWh for PV and wind vs R1.03 for coal).
 - * Wind and solar power technologies are of the cleanest electricity generation technologies, as it does not result in the release of emissions during its operation.
- » By contributing towards South Africa's total generation capacity, specifically through the utilisation of renewable energy resources.

The Kyoto Protocol (1997) is also relevant to the need for the development of the Umbila Emoyeni EGI (and the renewable energy facilities it will cater for) from an international perspective. The protocol calls for the reduction of South Africa's greenhouse gas emissions through actively cutting down on using fossil fuels, or by utilising more renewable resources. The development of the Umbila Emoyeni EGI will facilitate the connection to the grid of up to 816MW of renewable energy from wind and solar technologies, adding capacity to the renewable energy sector of the country and strengthen the commitment and action plan to achieve the requirements, as set out in the protocol, through the generation of energy without the emission of greenhouse gasses.

5.3. Need and Desirability from a National Perspective

Eskom's fleet of coal-fired power stations is on average over 40 years old, and its performance is deteriorating, which has resulted in constant power cuts across the country over the last years. The construction of two of Eskom's biggest power stations, namely, Medupi and Kusile, was delayed and has been set back by numerous design flaws, which has further exacerbated the issue of power outages in South Africa. In order to address the ongoing issue of load shedding, government is focused on two overriding objectives: first, to improve the performance of Eskom's existing power stations; and second, to add as much new generation capacity to the grid as possible, as quickly as possible.

The National Development Plan (NDP) envisages that, by 2030, South Africa will have an energy sector that provides reliable and efficient energy service at competitive rates; that is socially equitable through expanded access to energy at affordable tariffs; and that is environmentally sustainable through reduced emissions and pollution. Historically, coal has provided the primary fuel resource for baseload electricity generation in South Africa. Consequently, Eskom, who is the main electricity generating company in the country, generates approximately 85% of the country's electricity from coal resources (Stats SA, 2016), resulting in a large carbon footprint. Taking into consideration the need to ensure adequate supply of electricity and meet international obligations in terms of addressing climate change, Government has identified the need to diversify the energy mix within the country.

The Umbila Emoyeni EGI (and the renewable energy facilities it will cater for) is proposed in specific response to a National Government initiative, the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP), or a similar programme. The REIPPPP was initiated in order to give effect to the requirements of the IRP with regards to renewable energy targets. As a result, the need and desirability of the Umbila Emoyeni EGI from a national perspective can largely be linked from the project's alignment with national government policies, plans, and programmes which have relevance to energy planning and production (as discussed in detail in **Chapter 4**). The following key plans have been developed by National Government to consider South Africa's current energy production, projected future demands, and provides the necessary framework within which energy generation projects can be developed:

- » Integrated Energy Plan (IEP)
- » Integrated Resource Plan (IRP)

The above-mentioned energy plans have been extensively researched and are updated on an on-going basis to take into consideration changing scenarios, new information, developments in new technologies, and to reflect updated demands and requirements for energy production within the South African context. These plans form the basis of South Africa's energy generation sector and dictate national priorities for energy production.

The IEP is intended to provide a roadmap of South Africa's future energy landscape and guide future energy infrastructure investments and policy development. The Plan considered the three pillars of sustainable development, and list the following as the eight key energy planning objectives:

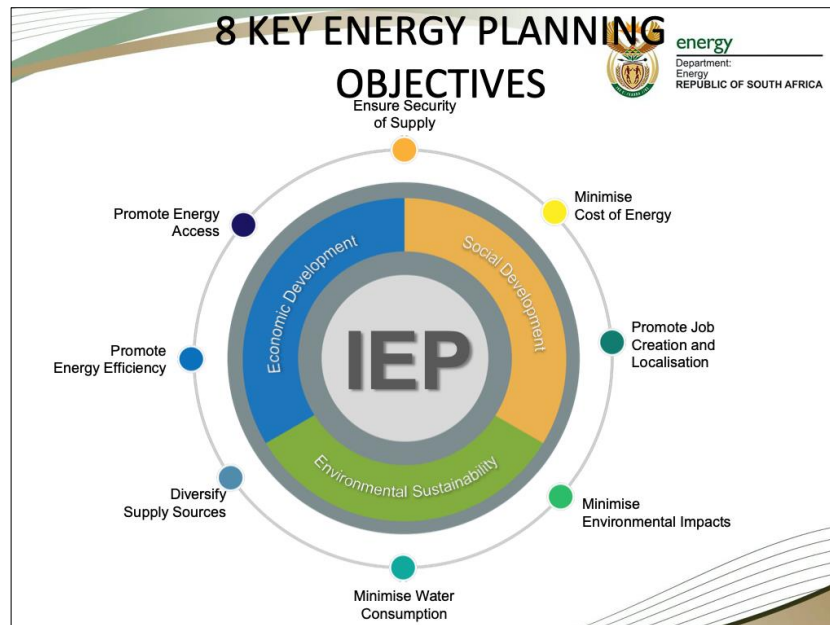


Figure 5.1: Eight key energy objectives as listed in the IEP, 2016 (extract from DOE presentation, December 2016)

In terms of electricity generation, the IEP states that South Africa should continue to pursue a diversified energy mix which reduces reliance on a single or a few primary energy sources. This includes both wind and solar technologies.

The IRP for Electricity 2010 – 2030 (gazetted in 2019) is a subset of the IEP and constitutes South Africa's current gazetted energy plan. The purpose of the plan is to ensure sustainable electricity development which takes into consideration technical, economic, and social constraints, and identifies investments in the electricity sector which are required to meet the country's forecasted electricity demands at minimum costs. This plan provides for the development of 17 743MW of capacity from large scale wind energy facilities by 2030, with an annual contribution of 1600MW from 2022, and 6000MW from large scale solar energy facilities by 2030.

A number of IPP Procurement Programmes have been initiated to secure electricity generated from a range of resources from the private sector (i.e., from Independent Power Producers, or IPPs). Under these Programmes, IPPs are invited to submit proposals for the finance, construction, operation, and maintenance of electricity generation facilities for the purpose of entering into an Implementation Agreement with the DMRE and a Power Purchase Agreement (PPA) with Eskom as the buyer. Provision has been made for new additional capacities in the IRP 2019 (refer to **Figure 5.2**).

	Coal	Cost (Decommissioning)	Nuclear	Hydro	Storage	PV	Wind	CSP	GAS/ Diesel	Other (Distributed Generation, Cogeri, Biomass, Landfill)
Current	3175		1860	2100	2912	1474	1980	300	3830	499
2019	2155	-2372	-	-	-	-	244	300	-	Allocation to the intent of the short term capacity and energy gap
2020	1433	-557	-	-	-	114	300	-		
2021	1433	-1403	-	-	-	300	818	-		
2022	755	-344	-	-	513	400 1000	1600	-		
2023	750	-555	-	-	-	1000	1600	-		
2024	1 000	-	1660	-	-	-	1600	-	1000	500
2025	7 000	-	-	-	-	1000	1600	-	-	500
2026	-	-1734	-	-	-	-	1600	-	-	500
2027	750	-547	-	-	-	-	1600	-	2000	500
2028	-	-475	-	-	-	1000	1600	-	-	500
2029	-	-1654	-	-	1575	1000	1600	-	-	500
2030	-	-1656	-	1500	-	1000	1600	-	-	500
Total Installed Capacity by 2030 (MW)		33164	1660	4600	5000	8288	17742	600	6380	-
% Total Installed Capacity (% of MW)		43	2.36	5.84	6.35	10.52	22.53	0.76	8.1	-
% Annual Energy Contribution (% of MWh)		58.3	4.5	0.3	1.2	6.3	17.8	0.6	1.3	-

Figure 5.2: A snapshot of the updated Energy Mix as per the IRP 2019

Renewable resources are valuable in contributing towards electricity generation and diversifying South Africa's electricity mix, while contributing towards South Africa's response to Climate Change. Under the REIPPPP, the DMRE intends to secure 14 725MW of electricity from renewable energy generation facilities utilising either onshore wind, concentrated solar thermal, solar photovoltaic (PV), biomass, biogas, landfill gas, or hydro across a number of bidding windows, while simultaneously contributing towards socio-economic development. Preferred bidders identified under any IPP Procurement Programme, including the REIPPPP, are required to satisfy a number of economic development requirements, including amongst others, job creation, local content, skills development, enterprise and supplier development, and socio-economic development. In addition to electricity generation and supply, IPP Procurement Programmes also contribute positively towards socio-economic development of a region, over and above job creation.

In addition to the policy considerations detailed above, Government has prioritised post COVID-19 turnaround plans in terms of renewable energies within the Just Energy Transition (JET), coupled with key development objectives of the various spheres of government. These policies share the same ideals, such as:

- » The utilisation, application and investment in renewable energy resources in South Africa is considered to be an essential means of reducing the carbon footprint of the country,
- » Diversifying the national economy,
- » Reducing poverty, and
- » Providing critical additional energy to that of Eskom.

Government has compiled an Economic Reconstruction and Recovery Plan which was presented to Parliament in October 2020. According to this plan, the economic survey will rely on a massive investment in infrastructure, including energy, telecommunications, ports and rail. The core elements of the Economic Reconstruction and Recovery Plan are as follows:

1. Priority interventions for economic recovery: the plan sets out eight priority interventions that will ignite South Africa's recovery and reconstruction effort. These are the flagship initiatives that all of society will rally around to build a new economy (**Figure 5.3**).
2. Enabling conditions for growth: these are growth-enhancing reforms and other preconditions for an inclusive, competitive and growing economy.
3. Macroeconomic framework: economic reconstruction and recovery requires careful mobilisation of resources to ensure fiscal sustainability.
4. Institutional arrangements: the plan focuses on execution, and is supported by enhanced institutional arrangements to ensure implementation and accountability.

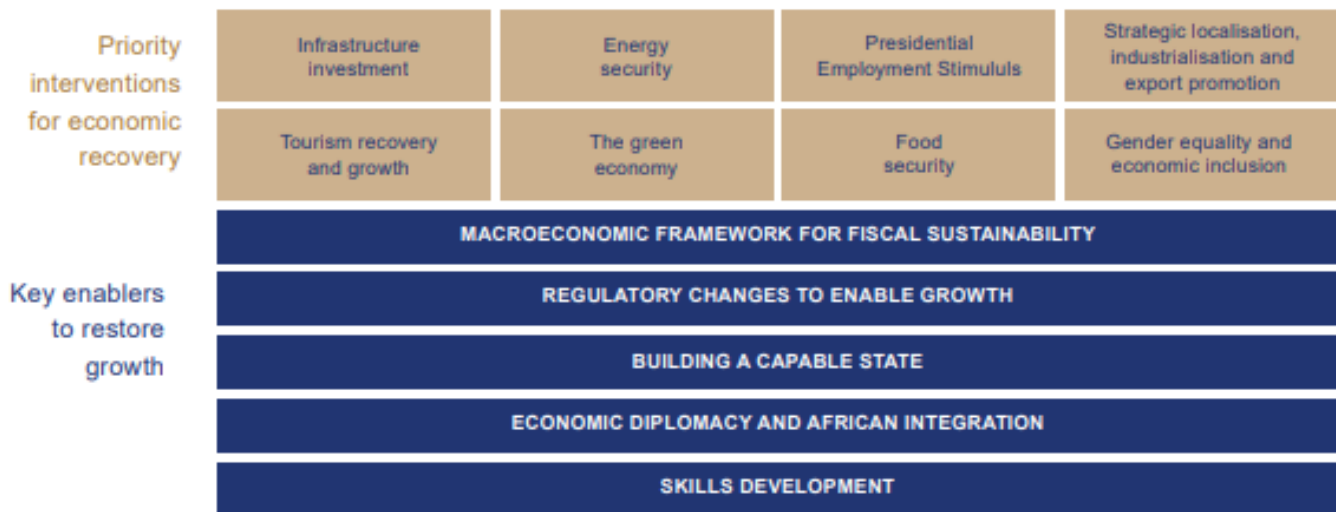


Figure 5.3: Core elements of the Economic Reconstruction and Recovery Plan (source: Building a new economy - Highlights of the Reconstruction and Recovery Plan, Presidency of the Republic of South Africa)

The plan recognises energy security as the most important prerequisite for the recovery agenda and states that renewed investment in a diversified energy mix can be achieved within a short time horizon, while alleviating a crippling energy crisis and facilitating a necessary transition to a less carbon-intensive economy. One of the key commitments of the plan is therefore to implement the IRP 2019 without delay to provide a substantial increase in the contribution of renewable energy sources by 2030, alongside other sources including battery storage, gas and clean coal. The transition to green energy is recognised as contributing towards the realisation of the low-carbon, climate-resilient and inclusive economy envisaged by the National Development Plan. The development of the Umbila Emoyeni EGI (through connection of the proposed wind and solar facilities to the national electricity grid) is identified as a mechanism for securing additional power generation capacity for input to the national grid, reducing the reliance for electricity on Eskom.

The South African government has identified the green economy as one of 12 job drivers that could help contribute to creating 5 million additional jobs by 2020. The New Growth Path, in which the sectoral jobs targets are disaggregated, envisages that as many as 300 000 new direct jobs could be created in the areas

of natural resource management and renewable energy construction (Department of Energy, 2019). Even though the project will not form part of the REIPPP programme, the Applicant will implement similar social and economic development strategies, including amongst others, job creation, local content, skills development, enterprise and supplier development, and socio-economic development. In addition to electricity generation and supply the project will therefore also contribute positively towards socio-economic development of a region, over and above job creation.

The need for new power generation from renewable energy facilities has been identified and assessed by government at a national scale considering the national energy requirements as well as international commitments under the Paris Agreement; therefore, provision has been made for the inclusion of new wind and solar power generation capacity in South Africa's energy mix. The implementation of the Umbila Emoyeni EGI has the potential to contribute positively towards the identified need through connection of up to 816MW of renewable energy (from wind and solar developments) to the grid, while simultaneously contributing to job creation and socio-economic development, identified as a need for the country within the National Development Plan (NDP).

The renewable energy facilities proposed as part of the Umbila Emoyeni Renewable Energy Farm (which also includes the EGI) will make use of renewable energy technology and would contribute positively towards reducing South Africa's GHG emissions and ensure compliance with all applicable legislation and permitting requirements. In addition, by making use of renewable energy technology, these facilities would have reduced water requirements when compared with some other generation technologies in alignment with one of the vision 2030 themes of the then-Department of Water and Sanitation's (now the Department of Human Settlements, Water and Sanitation) National Water Resource Strategy 2 (2013) (i.e., transitioning to a low carbon economy through stimulating renewable energy and retrofitting buildings).

5.3.1. Benefits of Renewable Energy and the Need and Desirability in the South African Environment

The generation of electricity from renewable energy resources offers a range of potential socio-economic and environmental benefits for South Africa. Although the proposed project is not a renewable energy facility, the development thereof will enable generation of electricity from renewable energy resources and the evacuation thereof, and thereby enabling the benefits of renewable energy development. The following benefits are identified:

Socio-economic upliftment of local communities: The Umbila Emoyeni Renewable Energy Farm has the potential to create much needed employment for unskilled locals during the construction phase. Training opportunities will also be afforded to qualified local people who can be upskilled to undertake certain roles during the construction and operation phases. Some of the challenges facing the Local and District municipalities, as detailed in the IDPs include High rates of unemployment, high levels of poverty, and low levels of development despite the strategic local in terms of the national transport corridors. The Local and District municipalities are therefore in need to economic development, sustainable employment opportunities and growth in personal income levels. A study undertaken by the DMRE, National Treasury and the Development Bank of Southern Africa (DBSA) in June 2017 found that employment opportunities created during the construction phase of renewable energy projects implemented to date had created 40% more jobs for South African citizens than anticipated. The study also found that significantly more people from local communities were employed during construction than was initially planned, confirming the potential benefits for local communities associated with the implementation of renewable energy projects.

Since inception of the REIPPPP in 2011, approximately 59 071 job years for South African citizens to date have been created.

Umbila Emoyeni Renewable Energy Farm also has the potential to make a positive contribution towards the identified community needs. In terms of the economic development requirements of the REIPPPP, the project will commit benefits to the local community in the form of job creation, localisation, and community ownership. In accordance with the DMRE's bidding requirements of the REIPPPP, a percentage of the revenue generated per annum during operation will be made available to local communities through a social beneficiation scheme. Therefore, the potential for creation of employment and business opportunities, and the opportunity for skills development for local communities is significant. Secondary social benefits can be expected in terms of additional spend in nearby towns due to the increased demand for goods and services. These socio-economic benefits would include an increase in the standard of living for local residents within the area as well as overall financial and economic upliftment.

Increased energy security: Given that renewables can often be deployed in a short timeframe and in a decentralised manner close to consumers, they offer the opportunity for improving grid strength and supply quality in the short-term, while reducing expensive distribution losses. According to CSIR's power sector statistics, South Africa experienced loadshedding for 650 hours in the first half of 2021 (15% of the time) wherein 963GWh of estimated energy was shed (mostly stage 2 load shedding). This is 76% of the total loadshedding experienced during 2020. It is important to note that although extensive load shedding continued during the first half of 2021, record relative variable renewable energy contributions were recorded.

Resource saving: It is estimated that the achievement of the targets in the Renewable Energy White Paper will result in water savings of approximately 16.5 million kilolitres per annum. As an already water-stressed nation, it is critical that South Africa engages in a variety of water conservation measures, particularly due to the detrimental effects of climate change on water availability. Renewable energy also translates into revenue savings, as fuel for renewable energy facilities is free, while compared to the continual purchase of fuel for conventional power stations.

According to the IPP Procurement Programme overview report dated 31 March 2021, water savings of 71.7 million kilolitres has been realised by the programme from inception to the date of this publication, of which 4.2 million kilolitres is in the 2021 reporting quarter included in this report.

Exploitation of significant renewable energy resource: At present, valuable renewable resources, including biomass by-products, solar irradiation and wind power remain largely unexploited. The use of these energy flows will strengthen energy security through the development of a diverse energy portfolio in South Africa.

According to the IPP Procurement Programme overview report, as of 31 March 2021, the REIPPPP had made the following significant impacts in terms of energy supply:

- » 6 422MW of electricity had been procured from 112 Renewable Energy Independent Power Producers (IPPs) in seven bid rounds⁸.

⁸ Bid windows 1, 2, 3, 3.5, 4 and small BW1 (1S2) and small BW2(2S2). 2 583 MW of renewable energy capacity was awarded to IPPs in the REIPPPP bid window 5 in October 2021.

- » 5 078 MW of electricity generation capacity from 79 IPP projects has been connected to the national grid.
- » 59 761GWh of energy has been generated by renewable energy sources procured under the REIPPPP since the first project became operational in November 2013. Renewable energy IPPs have proved to be very reliable. Of the 79 projects that have started operations, 67 projects have been operational for longer than a year. The electrical energy generated over the past 12-month period for the 67 projects is 11 679GWh, which is 94% of their annual energy contribution projections of 12 481GWh over a 12-month delivery period. Twenty-six (26) of the 67 projects (39%) have individually exceeded their projections.

In August 2021, Bid Window 5, which had aimed to sign up 2 600MW of power, including 1 600MW of wind and 1 000MW of solar was open. It attracted 102 bids, offering capacity of 9 644MW. 25 Preferred Bidders were selected to provide a total of 2 583MW from wind and solar developments. Bid window 6 closed on 03 October 2022 and aims to procure 4.2GW of electricity from wind and solar developments.

Economics: As a result of the excellent resource and competitive procurement processes, both wind power and solar PV power are now proven in South Africa as cheaper forms of energy generation than coal power. They offer excellent value for money to the economy and citizens of South Africa while benefitting society as a whole through the development of clean energy.

The following has been achieved by the IPP programme (March 2021) in terms of investment and economics:

- » Investment (equity and debt) to the value of R209.7 billion was attracted in seven bid rounds.
- » Socio-economic development contributions of R1.5 billion to date, of which R103.5 million was spent in this 2021 reporting quarter.
- » Enterprise development contributions of R463.5 million to date, of which R34.8 million was spent in this 2021 reporting quarter.

Pollution reduction: The release of by-products through the burning of fossil fuels for electricity generation has a particularly hazardous impact on human health and contributes to ecosystem degradation. The use of solar irradiation or wind for power generation is a non-consumptive use of a natural resource which produces zero emissions during its operation.

The overview of the Independent Power Producers Procurement Report (March 2021) indicates that a carbon emission reduction of 60.7 Mton CO₂ has been realised by the IPP programme from inception to date, of which 3.6 Mton is in the 2021 reporting quarter.

Climate friendly development: The uptake of renewable energy offers the opportunity to address energy needs in an environmentally responsible manner and thereby allows South Africa to contribute towards mitigating climate change through the reduction of GHG emissions. South Africa is estimated to currently be responsible for approximately 1% of global GHG emissions (and circa half of those for which Africa is responsible) and is ranked 12th worldwide in terms of per capita carbon dioxide emissions as of 2021. Since its inception, the REIPPPP has achieved carbon emission reductions⁹ of 60.7 Mton of CO₂. The development of Umbhila Emoyeni Renewable Energy Farm, and the associated electricity generated as a result of the facility, will result in considerable savings on tons of CO₂ emissions.

⁹ Carbon emission reduction is calculated based on a displacement of power, from largely coal-based to more environmentally friendly electrical energy generation, using a gross Eskom equivalent emissions factor of 1.015 tons CO₂/MWh.

Support for international agreements: The effective deployment of renewable energy provides a tangible means for South Africa to demonstrate its commitment to its international agreements under the Kyoto Protocol and the Paris Agreement, and for cementing its status as a leading player within the international community.

Employment creation: The development, procurement, installation, maintenance and management of renewable energy facilities have significant potential for job creation and skills development in South Africa. The construction phase will create temporary employment opportunities and the operation phase will create limited full-time employment opportunities.

Acceptability to society: Renewable energy offers a number of tangible benefits to society, including reduced pollution concerns, improved human and ecosystem health and climate friendly development.

Support to a new industry sector: The development of renewable energy offers the opportunity to establish a new industry within the South African economy, which will create jobs and skill local communities which have potential for further renewable energy projects.

Protecting the natural foundations of life for future generations: Actions to reduce our disproportionate carbon footprint can play an important part in ensuring our role in preventing dangerous anthropogenic climate change, thereby securing the natural foundations of life for generations to come; this is the basis of sustainable development.

5.4. Need and Desirability of the project from a Regional Perspective

The majority of South Africa's electricity generation infrastructure (coal-fired power stations) is currently located within Mpumalanga due to the location of coal resources within this province. As this coal capacity is decommissioned as plants come to the end of their useful life (many of the coal fired generators in the Province are more than 50 years old), this capacity will need to be replaced and jobs created for those involved in the coal supply chain. This is what is known as the **Just Energy Transition (JET)**. The Umbila Emoyeni Renewable Energy Farm (including the EGI) will have a vital role to play in this transition both in terms of energy generation and socio-economic upliftment.

The Mpumalanga Province has been identified as an area where electricity generation from renewable resources (including wind and solar energy) is highly feasible and a viable option. Provincial policies and plans include renewable energy development and economic upliftment from such developments as part of the strategic planning. The location of the study area and project site within the Mpumalanga Province is therefore considered to support the Province/Region's generation targets. Local municipality policies and plans include energy development and upliftment of the area as a result of such development as part of their priorities. The development of the proposed project is therefore supported at a planning level.

Construction of the grid infrastructure required to evacuate the power from the Umbila Emoyeni WEF and solar PV project will add significant value to the objectives of the JET. Without this grid connection, the wind energy facility and solar PV facility cannot be financed, built and constructed as they will not be able to connect to the national grid. There is therefore an urgent need for it to occur in parallel to the wind and solar projects.

The grid infrastructure is planned to be built in the coal-belt province of Mpumalanga. As this coal capacity is decommissioned as plants come to the end of their useful life (many of the coal fired generators in the Province are more than 50 years old), this capacity will need to be replaced and jobs created for those involved in the coal supply chain. This is what is known as the Just Energy Transition (JET). The Umbila Emoyeni wind and solar projects will have a vital role to play in this transition both in terms of energy generation and socio-economic upliftment. It is also increasingly difficult to finance and procure new coal generation due to environmental concerns that funders have. Additionally, the lowest cost of new generation is wind and solar (cheaper than coal on a LCOE basis). The argument therefore for new wind and solar generation in the coal belt province of Mpumalanga is compelling.

Without the associated grid infrastructure, the renewable energy projects will not be able to be constructed.

5.5. Receptiveness of and desirability of the project site to develop the Umbila Emoyeni EGI

As detailed in Chapter 3, the project site and development area have specifically been identified by the proponent as being highly desirable from a technical perspective for the development of the proposed EGI due to the following site characteristics:

The combination of the affected properties has an extent of ~27 819ha, which was considered by the developer as sufficient for the development of the Umbila Emoyeni EGI, including for the location of the MTS on the Camden SOL Lines. A development footprint within the project site for the placement of infrastructure has been identified considering environmental constraints and sensitivities identified within the project site through the Scoping Evaluation and is being assessed as part of this EIA Report. This consideration is in line with the mitigation strategy and enables the achievement of the objectives of the mitigation hierarchy (i.e., avoid, minimise, mitigate). This application of the mitigation strategy allows for the identification of the optimised placement of the PV facility within the development area. This approach will ensure that the final location of the Umbila Emoyeni EGI is desirable from an environmental and social perspective.

CHAPTER 6: APPROACH TO UNDERTAKING THE EIA PROCESS

In terms of the EIA Regulations of December 2014 (as amended) published in terms of the NEMA (Act No. 107 of 1998) as amended, the construction and operation of the Umbila Emoyeni EGI is a listed activity requiring EA. The application for EA is required to be supported by a (EIA full S&EIA process based on the capacity of the Electrical Grid Infrastructure being up to 400kV and Activity 9 of Listing Notice 2 (GNR 325) being triggered.

An EIA process refers to the process undertaken in accordance with the requirements of the 2014 EIA Regulations (GNR 326), as amended, which involves the identification and assessment of direct, indirect, and cumulative environmental impacts associated with a proposed project or activity. The EIA process comprises two main phases: i.e., **Scoping** and **EIA Phase**, and is illustrated in **Figure 6.1**. Public participation forms an important component of the process and is undertaken throughout both phases.

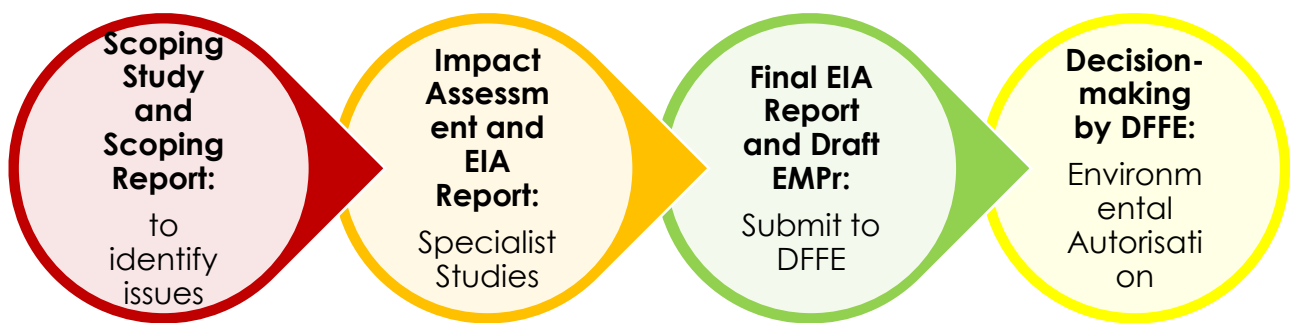


Figure 6.1: The Phases of an Environmental Impact Assessment (EIA) Process

This EIA phase of the S&EIA process aimed at assessing potential issues associated with the proposed project identified through the Scoping Phase. This was achieved through an assessment of the proposed project involving detailed specialist studies, as well as a consultation process with the Interested and Affected Parties (I&APs), including the decision-making authority, directly impacted landowners/occupiers, adjacent landowners/occupiers, relevant organs of state departments, ward councillors and other key stakeholders. This chapter serves to outline the process followed during the S&EIA process to date.

6.1 Legal Requirements as per the EIA Regulations, 2014 (as amended), for the undertaking of an Environmental Impact Assessment Report

This chapter includes the following information required in terms of Appendix 3: Scope of Assessment and Content of Environmental Impact Assessment Reports:

Requirement	Relevant Section
3(1)(d)(i) a description of the scope of the proposed activity, including all listed and specified activities	All listed activities triggered and applied for are included in Section 6.2 and Table 6.1 .

Requirement	Relevant Section
triggered and being applied for; and (ii) a description of the associated structures and infrastructure related to the development.	
3(1)(h)(ii) details of the public participation process undertaken in terms of Regulation 41 of the Regulations, including copies of the supporting documents and inputs.	The public participation process followed throughout the S&EIA process for the Umbila Emoyeni EGI is included in Section 6.5.2 and copies of the supporting documents and inputs are included in Appendix C .
3(1)(h)(iii) a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them.	The main issues raised through the undertaking of the public participation process, including consultation with I&APs, are included in the Comments and Responses Report in Appendix C9 .
3(1)(h)(vi) the methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks.	The methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks are included in Section 6.5.3 .
3(1)(p) a description of any assumptions, uncertainties, and gaps in knowledge which relate to the assessment and mitigation measures proposed.	The assumptions and limitations of the S&EIA process being undertaken for the Umbila Emoyeni EGI is included in Section 6.6 .

6.2 Relevant legislative permitting requirements

The legislative permitting requirements applicable to the Umbila Emoyeni EGI, as identified and considered within this S&EIA process, are described in more detail under the respective sub-headings.

6.2.1 National Environmental Management Act (No. 107 of 1998) (NEMA)

The NEMA is South Africa's key piece of national environmental legislation that provides for the authorisation of certain controlled activities known as "listed activities". In terms of Section 24(1) of the NEMA, the potential impact on the environment associated with listed activities must be considered, investigated, assessed, and reported on to the Competent Authority (the decision-maker) charged by NEMA with granting of the relevant Environmental Authorisation (EA). Since the Umbila Emoyeni EGI is essential infrastructure for a power generation project and therefore relates to the IRP for Electricity 2010 – 2030, the National Department of Forestry, Fisheries, and the Environment (DFFE) has been determined as the Competent Authority (CA) in terms of GNR 779 of 01 July 2016. The Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (DARDL&EA) is the Commenting Authority on the project.

The need to comply with the requirements of the EIA Regulations published under NEMA ensures that developers are provided the opportunity to consider the potential environmental impacts of their activities early in the project development process, and also allows for an assessment to be made as to whether environmental impacts can be avoided, minimised or mitigated to acceptable levels. Comprehensive, independent environmental studies are required to be undertaken in accordance with the EIA Regulations to provide the Competent Authority with sufficient information in order for an informed decision to be taken regarding the application for EA.

The EIA process being conducted for the Umbila Emoyeni EGI is undertaken in accordance with Section 24(5) of the NEMA, which defines the procedure to be followed in applying for EA, and requires that the potential consequences for, or impacts of, listed or specified activities on the environment be considered,

investigated, assessed, and reported on to the competent authority. Listed Activities are activities identified in terms of Section 24 of the NEMA which are likely to have a detrimental effect on the environment, and which may not commence without an EA from the competent authority subject to the completion of an environmental assessment process (either a Basic Assessment (BA) or full Scoping and EIA).

Table 6.1 details the listed activities in terms of the EIA Regulations, 2014 (as amended) that apply to the Umbila Emoyeni EGI, and for which an application for Environmental Authorisation has been submitted to the DFFE. The table also includes a description of the specific project activities that relate to the applicable listed activities.

Table 6.1: Listed activities as per the EIA Regulations that are triggered by the Umbila Emoyeni EGI

Notice Number	Activity Number	Description of listed activity
Listing Notice 1 (GNR 327) 08 December 2014 (as amended on 07 April 2017)	11(i)	The development of facilities or infrastructure for the transmission and distribution of electricity – (i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275kV. The development will include on-site switching stations (Eskom Portion) (132kV in capacity) at each renewable energy facility and 132kV power lines from the switching stations to a new MTS. The development will also include a collector substation with 2 x 132kV bus bars and 4 x 132kV IPP feeder bays to onsite IPP substations. The site is located outside of urban areas.
Listing Notice 1 (GNR 327) 08 December 2014 (as amended on 07 April 2017)	12(ii)(a)(c)	The development of – (ii) Infrastructure or structures with a physical footprint of 100 square metres or more Where such development occurs- (a) within a watercourse; or (c) within 32 metres of a watercourse. The development of the Umbila Emoyeni EGI will require the establishment of infrastructure with a physical footprint exceeding 100m². The development footprint of the MTS will be up to 600m x 600m. The project site is associated with the presence of freshwater/drainage features.
Listing Notice 1 (GNR 327) 08 December 2014 (as amended on 07 April 2017)	14	The development and related operation of facilities and infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres. The development and operation of the 400/132kV MTS and power line will require infrastructure for up to 80 cubic metres of storage of dangerous goods, which will include flammable and combustible liquids such as oils associated with the 400/132kV MTS, lubricants and solvents.
Listing Notice 1 (GNR 327)	19(i)	The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a (i) Watercourse.

Notice Number	Activity Number	Description of listed activity
08 December 2014 (as amended on 07 April 2017)		Freshwater and drainage features are present within the project site. During the construction phase, more than 10 cubic metres of rock will be removed from the water features for the development of the Umbila Emoyeni EGI and associated access roads.
Listing Notice 1 (GNR 327) 08 December 2014 (as amended on 07 April 2017)	24(ii)	The development of a road – (ii) with a reserve wider than 13.5m, or where no reserve exists where the road is wider than 8m. The construction of the Umbila Emoyeni EGI will require the construction of new access roads of 12m wide, in areas where no road reserve exists to provide access to the facility.
Listing Notice 1 (GNR 327) 08 December 2014 (as amended on 07 April 2017)	28(ii)	Residential, mixed, retail, commercial, industrial, or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: (ii) will occur outside an urban area, where the total land to be developed is bigger than 1ha. The Umbila Emoyeni EGI (considered to be an industrial development) will be constructed and operated on land currently zoned for agriculture. The development footprint considered is 600m x 600m (i.e., ~36ha) for the establishment of the MTS, 5ha per onsite substation and the power lines (which will be placed within servitudes of between 18m (132kV lines) and 55m (400kV lines). The infrastructure will be located outside an urban area.
Listing Notice 1 (GNR 327) 08 December 2014 (as amended on 07 April 2017)	56(ii)	The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre (ii) where no reserve exists, where the existing road is wider than 8 metres. Existing farm roads within the project site may require widening, and access roads will be widened by more than 6 metres.
Listing Notice 2 (GNR 325) 08 December 2014 (as amended on 07 April 2017)	9	The development of facilities or infrastructure for the transmission and distribution of electricity with a capacity of 275 kilovolts or more, outside an urban area or industrial complex. The capacity of the MTS will be 400kV and the capacity of the loop-in loop-out power line will be 400kV. The infrastructure will be located outside of any urban areas or industrial complexes.
Listing Notice 2 (GNR 325) 08 December 2014 (as amended on 07 April 2017)	15	The clearance of an area of 20ha or more of indigenous vegetation. The project will require the clearance of an area of 600m x 600m (i.e., ~36ha) (equivalent to the development footprint of the MTS) of vegetation, as well as vegetation associated with the tower positions within the power line servitude. The project would therefore result in the clearance of an area of indigenous vegetation greater than 20ha in extent.
Listing Notice 3 (GNR 325)	4(f)(i)(ee)	The development of a road wider than 4 metres with a reserve less than 13.5 metres.

Notice Number	Activity Number	Description of listed activity
08 December 2014 (as amended on 07 April 2017)		<p>f. Mpumalanga i. Outside urban areas: (ee) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans.</p> <p>The development of the Umbila Emoyeni EGI will require the development of access roads up to 8m wide (to provide direct access to the MTS) and a 4 – 6m wide service road under the power line in the Mpumalanga Province and outside urban areas. The project site is associated with the presence of a CBA1: Optimal (Terrestrial) and a CBA1: Irreplaceable (Freshwater).</p>
Listing Notice 3 (GNR 325) 08 December 2014 (as amended on 07 April 2017)	10(f)(i)(cc)(ee)(h h)	<p>The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres</p> <p>f. Mpumalanga i. Outside urban areas (cc) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority (ee) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans. (hh) Areas within a watercourse or wetland, or within 100 metres of a watercourse or wetland.</p> <p>The development and operation of the 400/132kV MTS, onsite substations and power lines will require infrastructure for up to 80 cubic metres of storage of dangerous goods, which will include flammable and combustible liquids such as oils associated with the 400/132kV MTS, lubricants and solvents. The site is associated with the presence of freshwater/drainage features, a CBA1: Optimal (Terrestrial) and a CBA1: Irreplaceable (Freshwater) and is located within the Mpumalanga Province and outside urban areas. Further, parts of the site are located in areas which could be considered sensitive in terms of the Gert Sibande District Environmental Management Framework (EMF).</p>
Listing Notice 3 (GNR 325) 08 December 2014 (as amended on 07 April 2017)	12(f)(ii)	<p>The clearance of an area of 300m² or more of indigenous vegetation within: b. Mpumalanga ii. Within critical biodiversity areas identified in bioregional plans.</p> <p>The Umbila Emoyeni EGI development will require clearance in excess of 300m² within areas classified as CBA1: Optimal (Terrestrial) and CBA1: Irreplaceable (Freshwater) in the Mpumalanga Province.</p>
Listing Notice 3 (GNR 325) 08 December 2014 (as amended on 07 April 2017)	14(ii)(a)(c)(f)(i)(d d)(ff)	<p>The development of— (ii) infrastructure or structures with a physical footprint of 10 square metres or more;</p> <p>where such development occurs— (a) within a watercourse; or</p>

Notice Number	Activity Number	Description of listed activity
		<p>(c) within 32 metres of a watercourse, measured from the edge of a watercourse.</p> <p>f. Mpumalanga ii. Outside urban areas: (dd) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority (ff) Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans.</p> <p>The development of Umbila Emoyeni EGI will require the establishment of infrastructure with a physical footprint exceeding 10m². The site is associated with the presence of freshwater/drainage features, a CBA1: Optimal (Terrestrial) and a CBA1: Irreplaceable (Freshwater), and is located within the Mpumalanga Province, and outside urban areas. Further, parts of the site are located in areas which could be considered sensitive in terms of the Gert Sibande District Environmental Management Framework (EMF).</p>
<p>Listing Notice 3 (GNR 325) 08 December 2014 (as amended on 07 April 2017)</p>	<p>18(f)(i)(ee)</p>	<p>The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre.</p> <p>f. Mpumalanga i. Outside urban areas: (ee) Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans.</p> <p>The development of the Umbila Emoyeni EGI will require the widening of roads by more than 4m, outside urban areas, and within areas classified as CBA1: Optimal (Terrestrial) and CBA1: Irreplaceable (Freshwater) in the Mpumalanga Province.</p>

6.2.2 National Water Act (No. 36 of 1998) (NWA)

In accordance with the provisions of the National Water Act (No. 36 of 1998) (NWA), all water uses must be licensed with the Competent Authority (i.e., the Regional Department of Water and Sanitation (DWS) or the relevant Catchment Management Agency (CMA)). Water use is defined broadly, and includes taking and storing water, activities which reduce stream flow, waste discharges and disposals, controlled activities (activities which impact detrimentally on a water resource), altering a watercourse, removing water found underground for certain purposes, and recreation.

Table 6.2 contains Water Uses associated with the proposed project and identified in terms of the NWA which require licensing either in the form of a General Authorisation (GA), or in the form of a Water Use License (WUL). The table also includes a description of those project activities which relate to the applicable Water Uses.

Table 6.2: List of Water Uses published under Section 21 of NWA, as amended.

Notice No.	Activity No.	Description of Water Use
NWA (No. 36 of 1998)	Section 21 (c)	Impeding or diverting the flow of water in a watercourse <i>The site considered for the establishment of the Umbila Emoyeni EGI is associated with the presence of freshwater/drainage features. Activities pertaining to the establishment of the EGI might encroach on freshwater/drainage features which may lead to an impediment and diversion of the flow in the watercourses.</i>
NWA (No. 36 of 1998)	Section 21 (i)	Altering the bed, banks, course or characteristics of a watercourse. <i>The site considered for the establishment of the Umbila Emoyeni EGI is associated with the presence of freshwater/drainage features. Activities pertaining to the establishment of the EGI might encroach on freshwater/drainage features which may lead to the altering of the characteristics of the watercourses.</i>

In the event that the flow of water in the freshwater/drainage features is affected and the bed, banks or course characteristics are altered, then a water use authorisation would be required. This will need to be in accordance with the requirements of the Regulations Regarding the Procedural Requirements for Water Use License Applications and Appeals (GNR 267), or a GA registered in accordance with the requirements of the Revision of General Authorisation. The process of applying for a WUL or GA registration will only be completed once a positive EA has been received and the project selected as Preferred Bidder under the REIPPPP or similar programme. This is in line with the requirements of the Department of Water and Sanitation (DWS).

6.2.3 National Heritage Resources Act (No. 25 of 1999) (NHRA)

The National Heritage Resources Act (No. 25 of 1999) (NHRA) provides an integrated system which allows for the management of national heritage resources, and to empower civil society to conserve heritage resources for future generations. Section 38 of NHRA provides a list of activities which potentially require the undertaking of a Heritage Impact Assessment.

Section 38: Heritage Resources Management

- 1). Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorised as –
- a. the construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;
 - b. the construction of a bridge or similar structure exceeding 50m in length;
 - c. any development or other activity which will change the character of a site –
 - i). exceeding 5 000m² in extent; or
 - ii). involving three or more existing erven or subdivisions thereof; or
 - iii). involving three or more erven or divisions thereof which have been consolidated within the past five years; or
 - iv). the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority.

Must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development.

In terms of Section 38(8), approval from the heritage authority is not required if an evaluation of the impact of such development on heritage resources is required in terms of any other legislation (such as NEMA), provided that the consenting authority ensures that the evaluation of impacts fulfils the requirements of the relevant heritage resources authority in terms of Section 38(3) and any comments and recommendations of the relevant resources authority with regard to such development have been taken into account prior to the granting of the consent. However, should heritage resources of significance be affected by the proposed development, a permit is required to be obtained prior to disturbing or destroying such resources as per the requirements of Section 48 of the NHRA, and the South African Heritage Resources Agency (SAHRA) Permit Regulations (GNR 668).

6.3 Overview of the Scoping Phase

The final Scoping Report submitted to the DFFE on **24 June 2022** and subsequently accepted on **04 August 2022** documented the evaluation of potential environmental impacts associated with the Umbila Emoyeni EGI. The Scoping Phase was conducted in accordance with the requirements of the 2014 EIA Regulations (GNR 326), as amended, and therefore aimed to:

- » Identify and evaluate potential environmental (biophysical and social) impacts and benefits of all phases of the proposed development (including design, construction, operation, and decommissioning) within the broader project site and development footprint through a review of existing baseline data, including specialist studies which were undertaken within the development footprint.
- » Identify potentially sensitive environmental features and areas within the development footprint in order to inform the preliminary design process of the EGI.
- » Define the scope of studies to be undertaken during the EIA process.
- » Provide the authorities with sufficient information in order to make a decision regarding the scope of issues to be addressed in the EIA Phase, as well as regarding the scope and extent of specialist studies that will be required to be undertaken.

Within this context, the objectives of the Scoping Phase were to, through a consultative process:

- » Identify the policies and legislation relevant to the project.
- » Motivate the need and desirability of the proposed project, including the need and desirability of the activity in the context of the preferred project location.
- » Identify and confirm feasible alternatives for the project.
- » Identify and describe potential impacts associated with the undertaking of the identified activities and proposed technology.
- » Identify areas of high sensitivity to be avoided by the project infrastructure.
- » Identify and list key issues associated with the project to be addressed during the EIA Phase through further detailed study and ground-truthing.
- » Agree on the level of assessment, including the methodology to be applied, the expertise required, and the extent of further consultation to be undertaken in the EIA Phase of the process, with the aim of determining the extent of impacts associated with the activities through the life cycle of the project (i.e., construction, operation, and decommissioning).

- » Identify suitable measures to avoid, manage or mitigate identified impacts and to determine the extent of the residual risks that need to be managed and monitored.

Key tasks undertaken within the Scoping Phase include:

- » Consultation with relevant decision-making and regulating authorities (at National, Provincial and Local levels).
- » Submission of the completed application for EA to the competent authority (i.e., the DFFE) in terms of Regulations 5 and 16 of the 2014 EIA Regulations (GNR 326), as amended.
- » Undertaking a public participation process in accordance with Chapter 6 of GNR 326 and the Department of Environmental Affairs (2017) Public Participation guidelines in terms of the NEMA EIA Regulations (hereinafter referred to as "the Guidelines") in order to obtain comments on and identify issues and concerns associated with the proposed project.
- » Undertaking of independent specialist studies in accordance with Appendix 6 of the EIA Regulations, 2014 (GNR 326), as amended, and the requirements of the Specialist Protocols published in Regulation GNR 320, issued on 20 March 2020 and GNR 1150 of 30 October 2020, where relevant, as well as other relevant guidelines.
- » Preparation of a Scoping Report and Plan of Study for the EIA in accordance with the requirements of Appendix 2 of the 2014 EIA Regulations (GNR 326).
- » Provision of a 30-day public and authority review period for the Scoping Report.
- » Preparation of a Comments and Response (C&R) Report detailing all comments raised by I&APs and responses provided as part of the Scoping Phase.
- » Submission of a Final Scoping Report, including a Plan of Study for the EIA, to the DFFE for review and acceptance on **24 June 2022**.

Table 6.3 provides a summary of the public participation process undertaken during the Scoping Phase.

Table 6.3: Summary of the public participation process undertaken during the Scoping Phase

Activity	Date
Announcement of the EIA process and the availability of the Scoping Report for a 30-day review and comment period, including details on how to access the Scoping Report via the online stakeholder engagement platform, in one local newspaper: » Ridge Times Newspaper (English advertisement)	10 May 2022
Distribution of the BID, process notification letters and stakeholder reply form announcing the EIA process and inviting I&APs to register on the project database. The BID and electronic reply form was also made available on the online stakeholder engagement platform.	12 May 2022
Placement of site notices at the project site, including placement of further notices in the towns of Bethal and Morgenon.	29 April 2022
Distribution of notification letters announcing the availability of the Scoping Report for a 30-day review and comment period. These letters were distributed to Organs of State, Government Departments, Ward Councillors, landowners within the surrounding area (including neighbouring landowners), registered I&APs and key stakeholder groups.	12 May 2022

Activity	Date
30-day review and comment period of the Scoping Report.	Thursday, 12 May 2022 to Monday, 13 June 2022
<p>Virtual meetings through the use of virtual platforms as determined through discussions with the relevant stakeholder group:</p> <ul style="list-style-type: none"> » Landowners » Authorities and key stakeholders (including Organs of State, local municipality and official representatives of community-based organisations). » Where an I&AP does not have access to a computer and/or internet to participate in a virtual meeting telephonic discussions (including WhatsApp video call) will be set-up and minuted for inclusion. The preferred language of the I&AP has been considered when setting up these discussions. <p>Direct in-person consultation will only take place in limited numbers and where sanitary conditions can be maintained at all times.</p>	<ul style="list-style-type: none"> » A public meeting was held with key stakeholders on Tuesday, 31 May 2022 at 17:00 – 18:00 via a virtual platform. » Focus group meetings were held with key stakeholders on Wednesday, 15 May 2022 at 09:00 – 10:30, 11:00 – 12:30 and 14:00 – 15:00 via a virtual platform. » A discussion session with directly affected landowners was held on Tuesday, 14 June 2022.

Acceptance of the Scoping Report and approval of the Plan of Study for the EIA Phase was received on 04 August 2022, marking the start of the EIA Phase (refer to **Appendix B**). Additional Information requested by the DFFE in the acceptance of the Scoping Report and the location of the requested information in this EIA Report is detailed in **Table 6.4**.

Table 6.4: DFFE requirements and response/ reference to section in the EIA Report

DFFE Requirement for EIA	Response/Location in this EIA Report
<p><u>(a) Listed Activities</u></p>	
<p>(i) The EIAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.</p>	<p>An assessment of impacts and recommended mitigation measures is included in this EIA Report (refer to Chapters 8 and 9).</p>
<p>(ii) The listed activities represented in the EIAR and the application form must be the same and correct.</p>	<p>The listed activities applied for in the application form submitted to the DFFE on 24 June 2022 are the same as those included in this EIA Report.</p>
<p>(iii) The EIAR must assess the correct sub listed activity for each listed activity applied for.</p>	<p>The EIA Report assess the correct sub listed activities for each listed activity applied for (refer to Section 6.2, Table 6.1).</p>
<p><u>(b) Public Participation</u></p>	
<p>(i) Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAR. This includes but is not limited to the Eskom, the provincial Department of Agriculture Rural Development, Land and Environmental Affairs, Mpumalanga Tourism and Parks Agency, Govan Mbeki Local Municipality, Lekwa and Msukaligwa Local Municipality, Gert Sibande District Municipality, the South African Heritage Resources Agency (SAHRA), The South African Civil Aviation Authority (SACAA), The Department of Transport, The Department of Water and Sanitation (DWS), The South African National Roads Agency Limited (SANRAL), The Endangered Wildlife Trust (EWT), The Endangered Wildlife Trust (EWT), Square Kilometre Array (SKA),The South African Astronomy Observation (SAAO) and the Department of Environment, Forestry and Fisheries: Directorate Biodiversity and Conservation.</p>	<p>All comments received to date have been included within the Comments and Responses Report (Appendix C9). Where comments have not been obtained, proof that attempts were made to obtain comments have been included in Appendix C4 and Appendix C5.</p> <p>The database detailing registered I&APs is included as Appendix C1 to the EIA Report.</p> <p>It must be noted that the EGI does not fall within the Msukaligwa Local Municipality and therefore comments from this authority are not relevant.</p>
<p>(ii) Please ensure that all issues raised and comments received during the circulation of the draft SR and draft EIAR from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final EIAR. Proof of correspondence with the various stakeholders must be included in the final EIAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.</p>	<p>Comments received during the 30-day review and comment period of the draft Scoping Report have been captured and addressed in the Comments and Responses Report attached as Appendix C9 to this EIA Report.</p> <p>Comments received during the 30-day review and comment period of the draft EIA Report will be captured and addressed in the Comments and Responses Report (Appendix C9) to be submitted with the final EIA Report to the DFFE for decision-making. Proof of correspondence with the various stakeholders will be included in the final EIA Report in Appendix C4 and Appendix C5. Where comments have not been obtained, proof that attempts were made to obtain comments will be included in Appendix C4 and Appendix C5.</p>
<p>(iii) A Comments and Response trail report (C&R) must be submitted with the final EIAR. The C&R report must incorporate all comments for this development. The C&R report</p>	<p>All comments received during the Scoping Phase, and the 30-day review and comment period of the draft EIA Report, including those of the DFFE, will be included</p>

DFFE Requirement for EIA	Response/Location in this EIA Report
<p>must be a separate document from the main report and the format must be in the table format as indicated in Appendix 1 of this comments letter. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as “noted” is not regarded as an adequate response to I&AP’s comments.</p>	<p>within the Comments and Responses Report (to be included as Appendix C9 to the final EIA Report). All comments received from I&APs to date have been copied verbatim and responded to clearly (refer to Appendix C9). Comments received during the 30-day review and comment period of the draft EIA Report will also be copied verbatim and responded to clearly within the Comments and Responses Report to be submitted with the final EIA Report.</p>
<p>(iv) Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.</p>	<p>Comments received from I&APs to date on the project have not been split and arranged in categories, and comments from each submission have been responded to individually (refer to Appendix C9).</p>
<p>(v) The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations, 2014, as amended.</p>	<p>The public participation process to date has been conducted in terms of Regulation 39, 40, 41, 42, 43 and 44 of the EIA Regulations 2014, as amended (GNR 326). Details of the public participation process undertaken to date are included in detail in Chapter 6 of the EIA Report.</p>
<p>(vi) The EAP is requested to contact the Department to make the necessary arrangements to conduct a site inspection prior to the submission of the final EIAR.</p>	<p>Necessary arrangements to conduct a site inspection prior to submission of the final EIA Report will be made with the Department during the 30-day draft EIA Report comment and review period.</p>
<p><u>(c) Alternatives</u> (i) Please provide a description of each of the preferred alternative type and provide detailed motivation on why it is preferred.</p>	<p>An overview of the various alternatives (i.e., property/location alternatives, design and layout alternatives, activity alternatives, and technology alternatives) considered for the Umbila Emoyeni EGI is included in Chapter 3 of the EIA Report. An assessment of the ‘do-nothing’ alternative is included in Chapter 9 of the EIA Report.</p>
<p><u>(d) Layout and Sensitivity Maps</u> (i) The EIAR must provide the four corner coordinate points for the proposed development site (note that if the site has numerous bend points, at each bend point coordinates must be provided) as well as the start, middle and end point of all linear activities.</p>	<p>The EIA Report includes coordinate points of the proposed project site (refer to Chapter 1, Table 1.1)</p>
<p>(ii) The EIAR must provide the following:</p> <ul style="list-style-type: none"> - Clear indication of the envisioned area for the proposed grid connection. - Clear description of all associated infrastructure. This description must include, but is not limited to the following: <ul style="list-style-type: none"> o Internal roads infrastructure. o All supporting onsite infrastructure such as laydown area, guardhouse, and control room. 	<p>The EGI layout is included in this EIA Report as Figure 7.1, under Chapter 7. A clear description of the infrastructure associated with the Umbila Emoyeni EGI is included in Chapter 2.</p>

DFFE Requirement for EIA	Response/Location in this EIA Report
<ul style="list-style-type: none"> o All necessary details regarding all possible locations and sizes of the proposed satellite substation and the main substation. 	
<p>(iii) A copy of the final preferred route layout map. All available biodiversity information must be used in the finalisation of the layout map. Existing infrastructure must be used as far as possible e.g. roads.</p>	<p>The grid corridor is included in this EIA Report as Figure 7.1. Potential sensitive areas were identified through specialist desktop and in-field studies. The sensitivity shapefiles were shared with the project developer and were used to inform the design of the grid corridor considered within this EIA Report. Existing roads will be used to access the project site as far as possible.</p>
<p>(iv) The layout map must indicate the following:</p> <ul style="list-style-type: none"> - Grid position and its associated infrastructure - Permanent laydown area footprint; - Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting on sections possible); - Wetlands, drainage lines, rivers, stream and water crossing of roads and cables indicating the type of bridging structures that will be used; - The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure; - Substation(s) and/or transformer(s) sites including their entire footprint; - Location of access and service roads; - Connection routes (including pylon positions) to the distribution/transmission network; - All existing infrastructure on the site, especially railway lines and roads; - Buffer areas; - Buildings, including accommodation; and - All “no-go” areas. 	<p>The grid corridor is included in this EIA Report as Figure 7.1. The layout includes proposed grid route and positions of associated infrastructure. A map showing the layout overlain on the identified environmental sensitivities is included in this EIA Report as Figure 9.1.</p>
<p>(v) An environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process</p>	<p>A map showing the layout overlain on the identified environmental sensitivities is included in this EIA Report as Figure 9.1.</p>
<p>(vi) map combining the final layout map superimposed (overlain) on the environmental sensitivity map.</p>	<p>A map showing the layout overlain on the identified environmental sensitivities is included in this EIA Report as Figure 9.1.</p>
<p>(e) Cumulative Assessment</p>	<p>Several renewable energy facilities within a 30km radius of the proposed development have been identified as detailed in Chapter 8 of the EIA Report. An</p>

DFFE Requirement for EIA	Response/Location in this EIA Report
<p>(i) Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:</p> <ul style="list-style-type: none"> - Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land. - Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project. - The cumulative impacts significance rating must also inform the need and desirability of the proposed development. - A cumulative impact environmental statement on whether the proposed development must proceed. 	<p>evaluation of potential cumulative impacts is included in Chapter 9 of the EIA Report.</p>
<p>(f) Specialist assessments</p> <p>(i) The EAP must ensure that the terms of reference for all the identified specialist studies must include the following:</p> <ul style="list-style-type: none"> - A detailed description of the study's methodology; indication of the locations and descriptions of the development footprint, and all other associated infrastructure that they have assessed and are recommending for authorisation. - Provide a detailed description of all limitations to the studies. All specialist studies must be conducted in the right season and providing that as a limitation will not be allowed. - Please note that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the 'no-go' areas. - Should the specialist definition of 'no-go' area differ from the Departments definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable. - All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA. 	<ul style="list-style-type: none"> - The identified specialist studies include a detailed description of the methodology followed as well as an indication of the location and description of the development and all other associated infrastructure. - The specialist studies provide a detailed description of the limitations to the studies. - The Department's definition of 'no-go' area is noted and has been considered within this EIA Report. The 'no-go' areas identified by the specialists have been considered by the developer when designing the facility layout. - The specialist's definition of 'no-go' area is the same as that of the Department and various 'no-go' areas, including their associated buffer areas, have been recommended by the specialists and have been considered by the developer when designing the facility layout. - All specialist studies attached to this EIA Report (refer to Appendix D – L are final and provide detailed and practical mitigation measures and reommendations. - The mitigation and enhancement measures proposed by the specialists are included in Chapters 7 and 8 of the EIA Report, as well as the project EMPs which are attached as Appendix N to the EIA Report. - Several renewable energy facilities within a 30km radius of the proposed development have been identified as detailed in Chapter 8 of the EIA Report.

DFFE Requirement for EIA	Response/Location in this EIA Report
<ul style="list-style-type: none"> - Should a specialist recommend specific mitigation measures, these must be clearly indicated. - Regarding cumulative impacts: <ul style="list-style-type: none"> o Clearly defined cumulative impacts and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land. o A detailed process flow to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project. o Identified cumulative impacts associated with the proposed development must be rated with the significance rating methodology used in the process. o The significance rating must also inform the need and desirability of the proposed development. o A cumulative impact environmental statement on whether the proposed development must proceed. 	<p>An evaluation of potential cumulative impacts is included in Chapter 9 of the EIA Report.</p>
<p>(ii) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice.</p>	<p>The appointed specialists do not specify contradicting recommendations.</p>
<p>(iii) Please include a table in the EIAR summarising the specialist studies required by the Screening Tool, a column indicating whether these studies were conducted or not, and a column with motivation for any studies not conducted.</p>	<p>Table 6.6, which is included under Section 6.5 of this EIA Report, details all the specialist studies required by the Screening Tool and a column indicating whether these studies were conducted or not.</p>
<p>(iv) It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Should this study be required, the specialist assessments must be conducted in accordance with these protocols. Please note further that the Protocols require the specialists to be SACNASP registered.</p>	<p>The specialist studies have been conducted in accordance with Government Notice No. 320 of 20 March 2020 (i.e., "the protocols"), and Government Notice No. 1150 of 30 October 2020 (i.e., protocols for terrestrial plant and animal species). The report compilers/reviewers are registered with SACNASP.</p>

DFFE Requirement for EIA	Response/Location in this EIA Report																				
<p>(v) Please be reminded that section 2(3) of NEMA requires developments to be socially, environmentally, and economically sustainable, while section 2(4)(i) of NEMA requires the social, economic and environmental impacts of activities, including disadvantages and benefits, to be considered, assessed and evaluated.</p>	<p>Specialist studies that focus on the biophysical environment (terrestrial biodiversity, aquatic biodiversity, avifauna, bats, etc.) and the socio-economic environmental have been undertaken as part of the S&EIA process for the proposed Umbila Emoyeni EGI. This EIA Report considers and assesses the social, economic and environmental impacts of the proposed activity, including disadvantages and benefits, as documented within the specialist reports included as Appendix D – L to this EIA Report.</p>																				
<p>(vi) The following specialist assessments will form part of the EIAR:</p> <table border="1" data-bbox="103 544 1093 1129"> <thead> <tr> <th>Specialist Study</th> <th>Company</th> </tr> </thead> <tbody> <tr> <td>Terrestrial Ecology (Fauna and Flora)</td> <td>Gerhard Botha of Nkurenkuru Ecology and Biodiversity (Pty) Ltd</td> </tr> <tr> <td>Freshwater resources (including all waterbodies and wetlands)</td> <td>Gerhard Botha of Nkurenkuru Ecology and Biodiversity (Pty) Ltd</td> </tr> <tr> <td>Bats</td> <td>Jonathan Aronson of Camissa</td> </tr> <tr> <td>Avifauna</td> <td>Owen Davies of Arcus Consulting</td> </tr> <tr> <td>Soils and Agricultural Potential</td> <td>Ivan Baker/Andrew Husted of the Biodiversity Company</td> </tr> <tr> <td>Heritage (including Cultural Landscape, Archaeology and Palaeontology)</td> <td>Jenna Lavin of CTS Heritage</td> </tr> <tr> <td>Visual</td> <td>Jon Marshall of Environmental Planning & Design CC</td> </tr> <tr> <td>Traffic</td> <td>Iris Wink of JG Afrika</td> </tr> <tr> <td>Socio-Economic</td> <td>Pierre van Jaarsveld of Urban-Econ Development Economist (Pty) Ltd</td> </tr> </tbody> </table>	Specialist Study	Company	Terrestrial Ecology (Fauna and Flora)	Gerhard Botha of Nkurenkuru Ecology and Biodiversity (Pty) Ltd	Freshwater resources (including all waterbodies and wetlands)	Gerhard Botha of Nkurenkuru Ecology and Biodiversity (Pty) Ltd	Bats	Jonathan Aronson of Camissa	Avifauna	Owen Davies of Arcus Consulting	Soils and Agricultural Potential	Ivan Baker/Andrew Husted of the Biodiversity Company	Heritage (including Cultural Landscape, Archaeology and Palaeontology)	Jenna Lavin of CTS Heritage	Visual	Jon Marshall of Environmental Planning & Design CC	Traffic	Iris Wink of JG Afrika	Socio-Economic	Pierre van Jaarsveld of Urban-Econ Development Economist (Pty) Ltd	<p>All specialist assessments listed in the table form part of this EIA Report (refer to Appendix D – L). It must be noted that no noise impact assessment has been undertaken for noise, as no impact in this regard was identified for the project, as per the accepted Plan of Study for the EIA process.</p>
Specialist Study	Company																				
Terrestrial Ecology (Fauna and Flora)	Gerhard Botha of Nkurenkuru Ecology and Biodiversity (Pty) Ltd																				
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<p>(g) Environmental Management Programme (EMPr)</p> <p>(i) It is drawn to your attention that for substation infrastructure and overhead electricity transmission and distribution infrastructure, when such facilities trigger activity 11 or 47 of the Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, the generic Environmental Management Programme (EMPr), contemplated in Regulations 19(4) must be used and submitted with the EIAR over and above the EMPr for the wind facility. Please ensure that any specific</p>	<p>The generic substation EMPr is included as Appendix N2 to the EIA Report. Section C of the EMPr includes specific mitigation measures identified in the EIA Report and specialist reports.</p>																				

DFFE Requirement for EIA	Response/Location in this EIA Report
<p>mitigation measures identified in the EIAR and specialist reports for the on-site substations are incorporated into the generic EMPr.</p>	
<p>(ii) Please ensure that the mitigation measures specified in the EIAR and specialist reports are also incorporated into the EMPr. In addition, ensure that the EMPr complies with the content of the EMPr in terms of Appendix 4 of the EIA Regulations, 2014, as amended.</p>	<p>The grid EMPr is included as Appendix N1 to the EIA Report. The grid EMPr has been compiled in accordance with Appendix 4 of the EIA Regulations, 2014, as amended, and includes all mitigation measures specified in the EIA Report and specialist reports.</p>
<p>(iii) Please also include in the EMPr, a recommended frequency for the auditing of compliance with the conditions of the EA and EMPr, and for the submission of such compliance reports to the competent authority.</p>	<p>A monitoring programme for the construction phase is included under Chapter 7, Section 7.4 of the facility EMPr attached as Appendix N1 to the EIA Report. The monitoring programme includes details on the frequency of auditing of compliance with the conditions of the EA and EMPr and the frequency of submission of such compliance reports to the competent authority.</p>
<p>(iv) EMPr must include an environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process.</p>	<p>The environmental sensitivity map is attached as Appendix A to the grid EMPr which is included as Appendix N1 to the EIA Report.</p>
<p>(v) A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.</p>	<p>A map showing the layout overlain on environmental sensitivities is attached as Appendix A to the facility EMPr which is included as Appendix N1 to the EIA Report.</p>
<p>(vi) EMPr must include measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants.</p>	<p>Measures to protect hydrological features during construction are included under Chapter 6, Objective 7.</p>
<p>(h) General (i) The EIAR must provide the technical details for the proposed facility in a table format as well as their description and/or dimensions.</p>	<p>The technical details of the proposed grid route, in table format, are included under Chapter 2 of the EIA Report (refer to Table 2.2).</p>
<p>(ii) Details of the future plans for the site and infrastructure after decommissioning in 20-30 years and the possibility of upgrading the proposed infrastructure to more advanced technologies must be indicated.</p>	<p>Details of the future plans for the site after decommissioning are included under Chapter 2 of the EIA Report (refer to Table 2.3).</p>
<p>(iii) Should a Water Use License be required, proof of application for a license needs to be submitted.</p>	<p>The site considered for the establishment of the Umbila Emoyeni EGI is associated with the presence of freshwater/drainage features. In the event that the flow of water in the freshwater/drainage features is affected and the bed, banks or course characteristics are altered, then a water use authorisation would be required. The process of applying for a WUL or GA registration will only be completed once a positive EA has been received and the project selected as Preferred Bidder under the REIPPPP or similar programme. This is in line with the requirements of DWS.</p>

DFFE Requirement for EIA	Response/Location in this EIA Report
<p>(iv) The EAP must provide landowner consent for all farm portions affected by the proposed project, whether the project component is linear or not, i.e., all farm portions where the access road, solar panels and associated infrastructure is to be located.</p>	<p>The landowner consents for the grid connection infrastructure were included as an Appendix 3 to the EA Application form submitted on 24 June 2022.</p>
<p>(v) A construction and operational phase EMPr that includes mitigation and monitoring measures must be submitted with the final EIAR.</p>	<p>The EMPr for the grid connection infrastructure is included as Appendix N1 to the EIA Report. The generic substation EMPr is included as Appendix N2 to the EIA Report. Both EMPrs include mitigation and monitoring measures for the construction and operational phases.</p>
<p>(vi) Please also ensure that the final EIAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 3 of the NEMA EIA Regulations, 2014, as amended.</p>	<p>The EA is required for a period of 10 years as detailed under Chapter 10, Section 10.6 of the EIA Report.</p>

6.4 Overview of the EIA Phase

As per the EIA Regulations (GNR 326), the objectives of the EIA Phase are to, through a consultative process:

- » Determine the policy and legislative context within which the activity is located and document how the proposed activity complies with and responds to the policy and legislative context.
- » Describe the need and desirability of the proposed activity, including the need and desirability of the activity in the context of the development footprint on the approved site as contemplated in the accepted Scoping Report.
- » Identify the location of the development footprint within the approved site as contemplated in the accepted Scoping Report based on an impact and risk assessment process inclusive of cumulative impacts and a ranking process focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects of the environment.
- » Determine the:
 - * Nature, significance, consequence, extent, duration and probability of the impacts occurring to inform identified preferred alternatives; and
 - * Degree to which these impacts:
 - Can be reversed;
 - May cause irreplaceable loss of resources; and
 - Can be avoided, managed or mitigated.
- » Identify the most ideal development footprint for the activity within the project site as contemplated in the accepted Scoping Report based on the lowest level of environmental sensitivity identified during the assessment.
- » Identify, assess, and rank the impacts the activity will impose on the development footprint on the approved site as contemplated in the accepted Scoping Report through the life of the activity.
- » Identify suitable measures to avoid, manage or mitigate identified impacts.
- » Identify residual risks that need to be managed and monitored.

This EIA Report assesses potential positive and negative, direct, indirect, and cumulative impacts associated with all phases of the project life cycle including pre-construction, construction, operation and decommissioning. In this regard the EIA Report aims to provide the relevant authorities with sufficient information to make an informed decision regarding the proposed project.

The following subsections outline the activities within the EIA process that have been undertaken to date.

6.4.1 Authority Consultation and Application for Environmental Authorisation in terms of the 2014 EIA Regulations (as amended)

In terms of GNR 779 of 1 July 2016, the DFFE is the competent authority for all projects which relate to the IRP and any updates thereto. As the project is proposed within the Mpumalanga Province, the Mpumalanga DARDL&EA is the provincial commenting authority for the project. Consultation with these authorities, as well as other relevant Organs of State will continue throughout the Scoping Phase. To date, this consultation has included the following:

- » Submission of the application for EA and the draft Scoping Report to the DFFE via the DFFE Novell Filr System on **13 May 2022**.
- » Submission of the final Scoping Report on **24 June 2022**.

- » Receipt of acceptance of the Scoping Report and approval of the Plan of Study for the EIA Phase on **04 August 2022**.

The following steps are to be undertaken as part of the EIA Phase of the process:

- » Make the draft EIA Report available for a 30-day public review and comment period from **14 October 2022** to **14 November 2022**.
- » Notification and consultation with stakeholders, I&APs and Organs of State that may have jurisdiction over the project, including provincial and local government departments, and State-Owned Enterprises.
- » Incorporating comments received during the 30-day public review and comment period into the final EIA Report.
- » Submission of the final EIA Report to DFFE for decision making.

The submissions, as listed above, were undertaken electronically, as required by the DFFE. A record of all authority correspondence undertaken during the Scoping Phase is included in **Appendix B**.

6.4.2 Public Participation Process

Public participation is an essential and regulatory requirement for an EIA process and is guided by Regulations 41 to 44 of the EIA Regulations 2014 (GNR 326), as amended. The purpose of public participation is clearly outlined in Regulation 40 of the EIA Regulations 2014 (GNR 326, as amended, and is being followed for this proposed project.

The sharing of information forms the basis of the public participation process and offers the opportunity for I&APs to become actively involved in the EIA Process from the outset. The public participation process is designed to provide sufficient and accessible information to I&APs in an objective manner. The public participation process affords I&APs opportunities to provide input into and receive information regarding the EIA process in the following ways:

During the Scoping Phase:

- » Provide an opportunity to submit comments regarding the project.
- » Assist in identifying reasonable and feasible alternatives, where required.
- » Contribute relevant local information and knowledge to the environmental assessment.
- » Allow registered I&APs to verify that their comments have been recorded, considered, and addressed, where applicable, in the environmental investigations.
- » Foster trust and co-operation.
- » Generate a sense of joint responsibility and ownership of the environment.
- » Comment on the findings of the Scoping Phase results.
- » Identify issues of concern and suggestions for enhanced benefits.

During the EIA Phase:

- » Contribute relevant local information and knowledge to the environmental assessment.
- » Verify that issues have been considered in the environmental investigations as far as possible as identified within the Scoping Phase.
- » Comment on the findings of the environmental assessments.
- » Attend a Focus Group Meeting to be conducted for the project.

During the **decision-making phase**:

- » To advise I&APs of the outcome of the competent authority's decision, and how and by when the decision can be appealed.

The Public Participation process therefore aims to ensure that:

- » Information containing all relevant facts in respect of the application is made available to potential stakeholders and I&APs for their review.
- » The information presented during the public participation process is presented in such a manner, i.e., local language and technical issues, that it avoids the possible alienation of the public and prevents them from participating.
- » Public participation is facilitated in such a manner that I&APs are provided with a reasonable opportunity to comment on the project.
- » A variety of mechanisms are provided to I&APs to correspond and submit their comments i.e., fax, post, email, telephone, text message (SMS and WhatsApp).
- » An adequate review period is provided for I&APs to comment on the findings of the Scoping and EIA Reports.

The following sections detail the tasks undertaken as part of the public participation process within the EIA Phase.

i. Advertisements and Notifications

The availability of the EIA Report for review and comment was announced to the Organs of State, potentially affected and adjacent landowners, tenants and occupiers, and the general public via the following:

- » Notification letter distributed to all registered parties advising them of the availability of the EIA Report for review on comment on **13 October 2022**.
- » An advertisement announcing the availability of and inviting comment on the EIA Report in the Ridge Times Newspaper (English advertisement) on **13 October 2022**. A copy of the newspaper advert as sent to the newspaper is included as **Appendix C2** of the EIA Report. The advert tear sheet is included in the final EIA Report as **Appendix C2**.
- » The EIA Report is available for review and comment by I&APs for a 30-day period from **14 October 2022 to 14 November 2022**. The EIA Report is available on the Savannah Environmental website (<https://savannahsa.com/public-documents/energy-generation/>) and all registered I&APs have been notified of the availability on **13 October 2022**. I&APs will be encouraged to review the EIA Report and submit written comment. The EIA Report will be circulated to Organs of State via electronic transfer (Dropbox, WeTransfer, etc), or CD and/or hardcopy as per individual request. Evidence of distribution of the EIA Report will be included in the final EIA Report as **Appendix C4** and **Appendix C5**.

ii. Public Involvement and Consultation

In order to accommodate the varying needs of stakeholders and I&APs within the surrounding area, as well as capture their views, comments, issues and concerns regarding the project, various opportunities will be provided to I&APs to note their comments and issues. I&APs will be consulted through the following means:

- » Opportunity to review the EIA Report for a 30-day review and comment period from **14 October 2022 to 14 November 2022**.

- » Comments received during this review period will be captured within a Comments and Responses Report (**Appendix C9**), which will be included within the final EIA Report.
- » Focus group meetings: Virtual focus group meetings with key government departments, stakeholders and landowners. The purpose of these focus group meetings will be to provide an overview of the findings of the EIA studies in order to facilitate comments on the EIA process and EIA Report, as well as to record any issues or concerns raised by stakeholders regarding the project. Where necessary or required, face-to-face meetings will be held. The minutes of these meetings will be included in the final EIA Report as **Appendix C7**.
- » Telephonic consultation sessions.
- » Written, faxed or e-mail correspondence.

Table 6.5: Public involvement for the general waste disposal site during EIA Phase

Activity	Date
Advertising of the availability of the EIA Report for a 30-day review and comment period in the Ridge Times Newspaper (English advertisement).	13 October 2022
Distribution of notification letters announcing the availability of the EIA Report for a 30-day review and comment period. These letters were distributed to Organs of State, Government Departments, Ward Councillors, landowners within the surrounding area (including neighbouring landowners), registered I&APs and key stakeholder groups.	13 October 2022
30-day review and comment period of the EIA Report.	14 October 2022 to 14 November 2022
Virtual meetings through the use of virtual platforms as determined through discussions with the relevant stakeholder group: <ul style="list-style-type: none"> » Landowners » Authorities and key stakeholders (including Organs of State, local municipality and official representatives of community-based organisations). 	Focus group meetings have been held during the EIA Phase as follows: <ul style="list-style-type: none"> » Landowner meeting at Oppi-Plaas near Morgenzon on 05 October 2022 » Virtual Key Stakeholder Workshop held on 07 October 2022
On-going consultation (i.e., telephone liaison; e-mail communication) with all I&APs.	Throughout the EIA process

iii. Registered I&APs entitled to Comment on the EIA Report

- 43.(1) A registered I&AP is entitled to comment, in writing, on all reports or plans submitted to such party during the public participation process contemplated in these Regulations and to bring to the attention of the proponent or applicant any issues which that party believes may be of significance to the consideration of the application, provided that the interested and affected party discloses any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application.
- (2) In order to give effect to section 24O of the Act, any State department that administers a law relating to a matter affecting the environment must be requested, subject to regulation 7(2), to comment within 30 days.
- 44.(1) The applicant must ensure that the comments of interested and affected parties are recorded in reports and plans and that such written comments, including responses to such comments and records of meetings, are attached to the reports and plans that are submitted to the competent authority in terms of these Regulations.
- (2) Where a person desires but is unable to access written comments as contemplated in subregulation (1) due to –
- (a) A lack of skills to read or write;
 - (b) Disability; or
 - (c) Any other disadvantage;
- Reasonable alternative methods of recording comments must be provided for.

I&APs registered on the database have been notified by means of a notification letter of the release of the EIA Report for a 30-day review and comment period, invited to provide comment on the EIA Report, and informed of the manner in which, and timeframe within which such comment must be made. The report is available in soft copies to I&APs. Hard copies of the report are available on request.

The EIA Report is available on the Savannah Environmental website (i.e., online stakeholder engagement platform) (<https://savannahsa.com/public-documents/energy-generation/>). A notification letter to all registered parties was distributed on **13 October 2022**. Where I&APs are not able to provide written comments (including SMS and WhatsApp), other means of consultation, such as telephonic discussions and face-to-face discussions will be used.

All comments raised as part of the discussions and written comments submitted during the 30-day review and comment period will be recorded and included in **Appendix C7 and C8** of the EIA Report.

iv. Identification and Recording of Comments

Comments raised by I&APs to date have been included into a Comments and Responses (C&R) Report, which is included in **Appendix C9** of this EIA Report. The C&R Report includes detailed responses from members of the EIA project team and/or the project proponent to the issues and comments raised. The C&R Report will be updated with all comments received during the 30-day review and comment period of the EIA Report and will be included as **Appendix C9** in the Final EIA Report submitted to the DFFE for decision-making.

Notes of all the telephonic discussions, virtual meetings, and face-to-face meetings (if any) to be conducted during the 30-day review and comment period of the EIA Report will be included in **Appendix C7** of the Final EIA Report.

6.5 Outcome of the DFFE Web-Based Screening Tool

In terms of GNR 960 (promulgated on 5 July 2019) and Regulation 16(1)(b)(v) of the 2014 EIA Regulations (as amended), the submission of a Screening Report generated from the national web based environmental screening tool is compulsory for the submission of applications in terms of Regulations 19 and 21 of the EIA Regulations.

The requirement for the submission of a Screening Report (included as **Appendix P** of the Scoping Report) for the Umbila Emoyeni EGI is applicable as it triggers Regulations 19 and 21 of the EIA Regulations, 2014, as amended. **Table 6.6** provides a summary of the specialist assessments identified in terms of the screening tool and responses to each assessment from the project team considering the project site under consideration.

Table 6.6: Sensitivity ratings from the DFFE's web-based online Screening Tool associated with the development of the Umbila Emoyeni EGI

Environmental Theme/Specialist Assessment	Sensitivity Rating as per the Screening Tool (relating to the need for the study)	Project Team Response
Agriculture	High	A Soils and Agricultural Potential Impact Assessment is included in this EIA Report as Appendix H .

Environmental Theme/Specialist Assessment	Sensitivity Rating as per the Screening Tool (relating to the need for the study)	Project Team Response
Animal Species	High	A Terrestrial Ecology Impact Assessment (including fauna) has been undertaken for the EGI and is included as Appendix D of the EIA Report.
Archaeological and Cultural Heritage	Low	A full Heritage Impact Assessment (including an assessment of archaeological heritage resources and the cultural landscape) has been undertaken for the EGI and is included in this EIA Report as Appendix I .
Palaeontology	Very High	A full Heritage Impact Assessment (including an assessment of palaeontological heritage resources) has been undertaken for the EGI and is included in this EIA Report as Appendix I .
Terrestrial Biodiversity	Very High	A Terrestrial Ecology Scoping Assessment has been undertaken for the EGI and is included as Appendix D of the EIA Report.
Aquatic Biodiversity	Very High	A Freshwater Impact Assessment has been undertaken for the EGI and is included as Appendix E of the EIA Report.
Civil Aviation	High	The Civil Aviation Authority (CAA) and Air Traffic Navigation Services (ATNS) will be consulted throughout the EIA process to obtain input and details of any requirements for further studies.
Defence	Low	The project site is not located within close proximity of any military base.
Plant Species	Medium	A Terrestrial Ecology Impact Assessment (including flora) has been undertaken for the Umbila Emoyeni EGI and is included as Appendix D of the EIA Report.
Avian	The screening report does not indicate a rating for this theme.	An Avifauna Impact Assessment has been undertaken for the EGI and included as Appendix F of the EIA Report.
Bats	The screening report does not indicate a rating for this theme.	A Bat Impact Assessment has been undertaken for the EGI and included as Appendix G of the EIA Report.
Visual	The screening report does not indicate a rating for this theme.	A Visual Impact Assessment has been undertaken for the EGI and included as Appendix J of the EIA Report.
Traffic	The screening report does not indicate a rating for this theme.	A Traffic Impact Assessment has been undertaken for the EGI and is included as Appendix L of the EIA Report.
Socio-Economic Assessment	The screening report does not indicate a rating for this theme.	A Socio-Economic Impact Assessment has been undertaken and is included in the EIA Report as Appendix K .

6.6 Assessment of Issues Identified throughout the EIA Process

Based on the outcomes of the Scoping Phase evaluation of the project, the following studies were identified as requiring detailed assessment, The specialist consultants involved in the assessment of these impacts are indicated in **Table 6.6** below.

Table 6.6: Specialist studies undertaken as part of the EIA Phase

Specialist	Specialist Study	Appendix
Gerhard Botha of Nkurenkuru Ecology and Biodiversity (Pty) Ltd	Terrestrial Ecology Impact Assessment	Appendix D
	Freshwater Impact Assessment	Appendix E
Owen Davies of Arcus Consulting	Avifauna Impact Assessment	Appendix F
Jonathan Aronson of Camissa	Bat Impact Assessment	Appendix G
Matthew Mamera and Andrew Husted of the Biodiversity Company	Soils and Agricultural Potential Impact Assessment	Appendix H
Jenna Lavin of CTS Heritage	Heritage Impact Assessment (including Archaeology Palaeontology and Cultural Heritage)	Appendix I
Jon Marshall of Environmental Planning & Design CC	Visual Impact Assessment	Appendix J
Pierre van Jaarsveld of Urban-Econ Development Economist (Pty) Ltd	Socio- Economic Impact Assessment	Appendix K
Iris Wink of JG Afrika	Traffic Impact Assessment	Appendix L

Specialist studies considered direct and indirect environmental impacts associated with the development of all components of the facility. Identified impacts are assessed in terms of the following criteria:

- » The **nature**, a description of what causes the effect, what will be affected, and how it will be affected
- » The **extent**, wherein it is indicated whether the impact will be local (limited to the immediate area or site of development), regional, national or international. A score of between 1 and 5 is assigned as appropriate (with a score of 1 being low and a score of 5 being high)
- » The **duration**, wherein it is indicated whether:
 - * The lifetime of the impact will be of a very short duration (0–1 years) – assigned a score of 1
 - * The lifetime of the impact will be of a short duration (2-5 years) - assigned a score of 2
 - * Medium-term (5–15 years) – assigned a score of 3
 - * Long term (> 15 years) - assigned a score of 4
 - * Permanent - assigned a score of 5
- » The **magnitude**, quantified on a scale from 0-10, where a score is assigned:
 - * 0 is small and will have no effect on the environment
 - * 2 is minor and will not result in an impact on processes
 - * 4 is low and will cause a slight impact on processes
 - * 6 is moderate and will result in processes continuing but in a modified way
 - * 8 is high (processes are altered to the extent that they temporarily cease)
 - * 10 is very high and results in complete destruction of patterns and permanent cessation of processes
- » The **probability of occurrence**, which describes the likelihood of the impact actually occurring. Probability is estimated on a scale, and a score assigned:
 - * Assigned a score of 1–5, where 1 is very improbable (probably will not happen)
 - * Assigned a score of 2 is improbable (some possibility, but low likelihood)
 - * Assigned a score of 3 is probable (distinct possibility)
 - * Assigned a score of 4 is highly probable (most likely)
 - * Assigned a score of 5 is definite (impact will occur regardless of any prevention measures)
- » The **significance**, which is determined through a synthesis of the characteristics described above (refer formula below) and can be assessed as low, medium or high
- » The **status**, which is described as either positive, negative or neutral

- » The degree to which the impact can be reversed
- » The degree to which the impact may cause irreplaceable loss of resources
- » The degree to which the impact can be mitigated

The **significance** is determined by combining the criteria in the following formula:

$S = (E+D+M) P$; where

S = Significance weighting

E = Extent

D = Duration

M = Magnitude

P = Probability

The **significance weightings** for each potential impact are as follows:

- » **< 30 points:** Low (i.e. where this impact would not have a direct influence on the decision to develop in the area)
- » **30-60 points:** Medium (i.e. where the impact could influence the decision to develop in the area unless it is effectively mitigated)
- » **60 points:** High (i.e. where the impact must have an influence on the decision process to develop in the area)

Specialist studies also considered cumulative impacts associated with similar developments within the broader project site. The purpose of the cumulative assessment is to test if such impacts are relevant to the proposed project in the proposed location (i.e., whether the addition of the proposed project in the area will increase the impact). In this regard, specialist studies considered whether the construction of the proposed development will result in:

- » Unacceptable risk
- » Unacceptable loss
- » Complete or whole-scale changes to the environment or sense of place
- » Unacceptable increase in impact

A conclusion regarding whether the proposed development will result in any unacceptable loss or impact considering all the projects proposed in the area is included in the respective specialist reports.

As the project developer has the responsibility to avoid or minimise impacts and plan for their management (in terms of the requirements of NEMA and the 2014 EIA Regulations (GNR 326)), the mitigation of significant impacts is discussed. Assessment of impacts with mitigation is made in order to demonstrate the effectiveness of the proposed mitigation measures. A facility EMPr and a generic substation EMPr that include all the mitigation measures recommended by the specialists for the management of significant impacts are included as **Appendix N1 and N2** to this EIA Report.

6.7 Assumptions and Limitation of the EIA Process

The following assumptions and limitations are applicable to the EIA process for the Umbila Emoyeni EGI:

- » All information provided by the developer and I&APs to the environmental team was correct and valid at the time it was provided.
- » The project site identified by the developer represents a technically suitable site for the establishment of the proposed EGI infrastructure, which is based on the design undertaken by technical consultants for the project.
- » The development footprint (the area that will be affected during the operation phase) will include the footprint for the proposed infrastructure.
- » Conclusions of the specialist studies undertaken, and this overall impact assessment assume that any potential impacts on the environment associated with the proposed development will be avoided, mitigated, or offset in accordance with the relevant recommendations made.
- » This report and its investigations are project specific, and consequently the environmental team did not evaluate any other power generation alternatives.

Refer to the specialist studies contained in **Appendices D - L** for limitations specific to the independent specialist studies.

6.8 Legislation and Guidelines that have informed the preparing of the Scoping Report

The following legislation and guidelines have informed the scope and content of the Scoping Report:

- » National Environmental Management Act (Act No. 107 of 1998).
- » EIA Regulations of December 2014, published under Chapter 5 of NEMA (as amended).
- » Department of Environmental Affairs (2017), Public Participation guidelines in terms of NEMA EIA Regulations.
- » Department of Environmental Affairs (2017), Integrated Environmental Management Guideline: Guideline on Need and Desirability.
- » 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; and
- » International guidelines – the Equator Principles, the IFC Performance Standards, the Sustainable Development Goals, World Bank Environmental and Social Framework, and the and World Bank Group Environmental, Health, and Safety Guidelines (EHS Guidelines).

Several other Acts, standards or guidelines have also informed the project process and the scope of issues addressed and assessed in this Scoping Report. A review of legislative requirements applicable to the proposed project as identified at this stage in the process is provided in **Table 6.7**.

Table 6.7: Relevant legislative permitting requirements applicable to the Umbila Emoyeni EGI

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
National Legislation			
Constitution of the Republic of South Africa (No. 108 of 1996)	<p>In terms of Section 24, the State has an obligation to give effect to the environmental right. The environmental right states that:</p> <p><i>"Everyone has the right –</i></p> <ul style="list-style-type: none"> » <i>To an environment that is not harmful to their health or well-being, and</i> » <i>To have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that:</i> <ul style="list-style-type: none"> * <i>Prevent pollution and ecological degradation,</i> * <i>Promote conservation, and</i> * <i>Secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development."</i> 	Applicable to all authorities	There are no permitting requirements associated with this Act. The application of the Environmental Right however implies that environmental impacts associated with proposed developments are considered separately and cumulatively. It is also important to note that the "right to an environment clause" includes the notion that justifiable economic and social development should be promoted, through the use of natural resources and ecologically sustainable development.
National Environmental Management Act (No. 107 of 1998) (NEMA)	<p>The 2014 EIA Regulations have been promulgated in terms of Chapter 5 of NEMA. Listed activities which may not commence without EA are identified within the Listing Notices (GNR 327, GNR 325 and GNR 324) which form part of these Regulations (GNR 326).</p> <p>In terms of Section 24(1) of NEMA, the potential impact on the environment associated with these listed activities must be assessed and reported on to the competent authority charged by NEMA with granting of the relevant environmental authorisation.</p> <p>Considering the capacity of the proposed MTS which forms part of the Umbila Emoyeni EGI (i.e., 400MW) and the triggering of Activity 9 of Listing Notice 2 (GNR 325), a full</p>	<p>DFFE – Competent Authority</p> <p>Mpumalanga DARDL&EA – Commenting Authority</p>	The listed activities triggered by the proposed project have been identified and are being assessed as part of the EIA process currently underway for the project. The EIA process will culminate in the submission of a Final EIA Report to the DFFE for decision-making.

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	Scoping and EIA process is required in support of the Application for EA.		
National Environmental Management Act (No 107 of 1998) (NEMA)	<p>In terms of the "Duty of Care and Remediation of Environmental Damage" provision in Section 28(1) of NEMA every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment.</p> <p>In terms of NEMA, it is the legal duty of a project proponent to consider a project holistically, and to consider the cumulative effect of a variety of impacts.</p>	<p>DFFE</p> <p>Mpumalanga DARDL&EA</p>	While no permitting or licensing requirements arise directly by virtue of the proposed project, this section finds application through the consideration of potential cumulative, direct, and indirect impacts. It will continue to apply throughout the life cycle of the project.
Environment Conservation Act (No. 73 of 1989) (ECA)	<p>The Noise Control Regulations in terms of Section 25 of the ECA contain regulations applicable for the control of noise in the Provinces of Limpopo, North-West, Mpumalanga, Northern Cape, Eastern Cape, and KwaZulu-Natal Provinces.</p> <p>The Noise Control Regulations cover the powers of a local authority, general prohibitions, prohibitions of disturbing noise, prohibitions of noise nuisance, use of measuring instruments, exemptions, attachments, and penalties.</p> <p>In terms of the Noise Control Regulations, no person shall make, produce, or cause a disturbing noise, or allow it to be made, produced or caused by any person, machine, device or apparatus or any combination thereof (Regulation 04).</p>	<p>DFFE</p> <p>Mpumalanga DARDL&EA</p> <p>Govan Mbeki Local Municipality</p> <p>Lekwa Local Municipality</p>	<p>Noise impacts are expected to be associated with the construction phase of the project. Impacts are expected to be of short duration and would not require any permits. Management measures to minimise impacts are included within the EMPr.</p> <p>No permits are required in this regard in terms of this Act. Any applicable by-laws would however be required to be complied with.</p>
National Water Act (No. 36 of 1998) (NWA)	A water use listed under Section 21 of the NWA must be licensed with the Regional DWS, unless it is listed in Schedule 1 of the NWA (i.e. is an existing lawful use), is permissible under	Regional Department of Water and Sanitation	Freshwater/drainage features are present within the project site of the Umbila Emoyeni EGI as identified in the Freshwater Impact Assessment (Appendix E). As a result, a water

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	<p>a GA, or if a responsible authority waives the need for a licence.</p> <p>Water use is defined broadly, and includes consumptive and non-consumptive water uses, taking and storing water, activities which reduce stream flow, waste discharges and disposals, controlled activities (activities which impact detrimentally on a water resource), altering a watercourse, removing water found underground for certain purposes, and recreation.</p> <p>Consumptive water uses may include taking water from a water resource (Section 21(a)) and storing water (Section 21(b)).</p> <p>Non-consumptive water uses may include impeding or diverting of flow in a water course (Section 21(c)), and altering of bed, banks or characteristics of a watercourse (Section 21(i)).</p>		<p>use authorisation for the project will be required from the DWS; however, the process will only be completed once a positive EA has been received and the project selected as Preferred Bidder by the DMRE's REIPPP Programme or a similar private offtaker programme. This is in line with the requirements from the DWS.</p>
<p>Minerals and Petroleum Resources Development Act (No. 28 of 2002) (MPRDA)</p>	<p>In accordance with the provisions of the MPRDA a mining permit is required in accordance with Section 27(6) of the Act where a mineral in question is to be mined, including the mining of materials from a borrow pit.</p> <p>Section 53 of the MPRDA states that any person who intends to use the surface of any land in any way which may be contrary to any object of the Act, or which is likely to impede any such object must apply to the Minister for approval in the prescribed manner.</p>	<p>Department of Mineral Resources and Energy (DMRE)</p>	<p>Any person who wishes to apply for a mining permit in accordance with Section 27(6) must simultaneously apply for an EA in terms of NEMA. No borrow pits are expected to be required for the construction of the project, and as a result a mining permit or EA in this regard is not required to be obtained.</p> <p>In terms of Section 53 of the MPRDA, approval is required from the Minister of Mineral Resources and Energy to ensure that the proposed development does not sterilise a mineral resource that might occur on site.</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
<p>National Environmental Management: Air Quality Act (No. 39 of 2004) (NEM:AQA)</p>	<p>The National Dust Control Regulations (GNR 827) published under Section 32 of NEM:AQA prescribe the general measures for the control of dust in all areas, and provide a standard for acceptable dustfall rates for residential and non-residential areas.</p> <p>In accordance with the Regulations (GNR 827) any person who conducts any activity in such a way as to give rise to dust in quantities and concentrations that may exceed the dustfall standard set out in Regulation 03 must, upon receipt of a notice from the air quality officer, implement a dustfall monitoring programme.</p> <p>Any person who has exceeded the dustfall standard set out in Regulation 03 must, within three months after submission of the dustfall monitoring report, develop and submit a dust management plan to the air quality officer for approval.</p>	<p>Mpumalanga DARDL&EA / Gert Sibande District Municipality</p>	<p>In the event that the project results in the generation of excessive levels of dust the possibility could exist that a dustfall monitoring programme would be required for the project, in which case dustfall monitoring results from the dustfall monitoring programme would need to be included in a dust monitoring report, and a dust management plan would need to be developed.</p>
<p>National Heritage Resources Act (No. 25 of 1999) (NHRA)</p>	<p>Section 07 of the NHRA stipulates assessment criteria and categories of heritage resources according to their significance.</p> <p>Section 35 of the NHRA provides for the protection of all archaeological and palaeontological sites, and meteorites.</p> <p>Section 36 of the NHRA provides for the conservation and care of cemeteries and graves by SAHRA where this is not the responsibility of any other authority.</p> <p>Section 38 of the NHRA lists activities which require developers or any person who intends to undertake a listed activity to notify the responsible heritage resources authority and furnish it with details regarding the location, nature, and extent of the proposed development.</p>	<p>South African Heritage Resources Agency (SAHRA)</p> <p>Mpumalanga Provincial Heritage Resources Authority – provincial heritage authority</p>	<p>A full Heritage Impact Assessment has been undertaken as part of the EIA process (refer to Appendix I of the EIA Report). According to the Heritage Impact Assessment, even though the area is rich in history, no significant archaeological heritage resources were identified during the field assessment. No Stone Age or Iron Age heritage resources were identified during the survey. The few heritage resources that were identified consist of the ruins of older farm structures and kraals.</p> <p>The field assessment identified burial grounds or graves within the study area. All graves are of high local significance as a result of their social and cultural value.</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	<p>Section 44 of the NHRA requires the compilation of a Conservation Management Plan as well as a permit from SAHRA for the presentation of archaeological sites as part of tourism attraction.</p>		<p>The area proposed for the development is underlain by sediments of insignificant to zero palaeontological sensitivity. No impacts to sensitive fossil heritage are therefore anticipated to result from the proposed EGI development.</p> <p>Should a heritage resource be impacted upon, a permit may be required from SAHRA or the Mpumalanga Provincial Heritage Resources Authority in accordance with Section 48 of the NHRA, and the SAHRA Permit Regulations (GNR 668).</p>
<p>National Environmental Management: Biodiversity Act (No. 10 of 2004) (NEM:BA)</p>	<p>Section 53 of NEM:BA provides for the MEC / Minister to identify any process or activity in such a listed ecosystem as a threatening process.</p> <p>Three government notices have been published in terms of Section 56(1) of NEM:BA as follows:</p> <ul style="list-style-type: none"> » Commencement of TOPS Regulations, 2007 (GNR 150). » Lists of critically endangered, vulnerable and protected species (GNR 151). » TOPS Regulations (GNR 152). <p>It provides for listing threatened or protected ecosystems, in one of four categories: critically endangered (CR), endangered (EN), and vulnerable (VU) or protected. The first national list of threatened terrestrial ecosystems has been gazetted, together with supporting information on the listing process including the purpose and rationale for listing ecosystems, the criteria used to identify listed ecosystems, the implications of listing ecosystems, and summary statistics and</p>	<p>DFFE Mpumalanga DARDL&EA</p>	<p>Under NEM:BA, a permit would be required for any activity that is of a nature that may negatively impact on the survival of a listed protected species.</p> <p>A Terrestrial Ecology Impact Assessment has been undertaken for the project (refer to Appendix D). No protected species were recorded within the site. However, several protected faunal species have been recorded by affected landowners. Should these be impacted on by the proposed project, a permit would be required to be obtained.</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	national maps of listed ecosystems (NEM:BA: National list of ecosystems that are threatened and in need of protection, (Government Gazette 37596, GNR 324), 29 April 2014).		
National Environmental Management: Biodiversity Act (No. 10 of 2004) (NEM:BA)	<p>Chapter 5 of NEM:BA pertains to alien and invasive species, and states that a person may not carry out a restricted activity involving a specimen of an alien species without a permit issued in terms of Chapter 7 of NEM:BA, and that a permit may only be issued after a prescribed assessment of risks and potential impacts on biodiversity is carried out.</p> <p>Applicable, and exempted alien and invasive species are contained within the Alien and Invasive Species List (GNR 864).</p>	<p>DFFE Mpumalanga DARDL&EA</p>	<p>A Terrestrial Ecology Impact Assessment has been undertaken as part of the EIA process to identify the presence of any alien and invasive species present on site. A total of 40 alien plant species were found within the study area, 11 of which were NEM:BA listed invasive species (refer to Appendix D).</p>
Conservation of Agricultural Resources Act (No. 43 of 1983) (CARA)	<p>Section 05 of CARA provides for the prohibition of the spreading of weeds.</p> <p>Regulation 15 of GN R1048 published under CARA provides for the classification of categories of weeds and invader plants, and restrictions in terms of where these species may occur.</p> <p>Regulation 15E of GN R1048 published under CARA provides requirement and methods to implement control measures for different categories of alien and invasive plant species.</p>	<p>Department of Agriculture, Land Reform and Rural Development (DALRD)</p>	<p>CARA will find application throughout the life cycle of the project. In this regard, soil erosion prevention and soil conservation strategies need to be developed and implemented. In addition, a weed control and management plan must be implemented.</p> <p>In terms of Regulation 15E (GN R1048) where Category 1, 2 or 3 plants occur a land user is required to control such plants by means of one or more of the following methods:</p> <ul style="list-style-type: none"> » Uprooting, felling, cutting or burning. » Treatment with a weed killer that is registered for use in connection with such plants in accordance with the directions for the use of such a weed killer. » Biological control carried out in accordance with the stipulations of the

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
			<p>Agricultural Pests Act (No. 36 of 1983), the ECA and any other applicable legislation.</p> <ul style="list-style-type: none"> » Any other method of treatment recognised by the executive officer that has as its object the control of plants concerned, subject to the provisions of sub-regulation 4. » A combination of one or more of the methods prescribed, save that biological control reserves and areas where biological control agents are effective shall not be disturbed by other control methods to the extent that the agents are destroyed or become ineffective.
<p>National Forests Act (No. 84 of 1998) (NFA)</p>	<p>According to this Act, the Minister may declare a tree, group of trees, woodland or a species of trees as protected. Notice of the List of Protected Tree Species under the National Forests Act (No. 84 of 1998) was published in GNR 734.</p> <p>The prohibitions provide that “no person may cut, damage, disturb, destroy or remove any protected tree, or collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree, except under a licence granted by the Minister”.</p>	<p>Department of Agriculture, Land Reform and Rural Development (DALRD)</p>	<p>A licence is required for the removal of protected trees. It is therefore necessary to conduct a survey that will determine the number and relevant details pertaining to protected tree species present in the development footprint for the submission of relevant permits to authorities prior to the disturbance of these individuals.</p> <p>A Terrestrial Ecology Impact Assessment has been undertaken as part of the EIA process to identify the presence of any protected trees present on site which will require a permit. No protected tree species were identified. Should any species be affected by the project, a permit would be required to be obtained.</p>
<p>National Veld and Forest Fire Act (No. 101 of 1998) (NVFFA)</p>	<p>Chapter 4 of the NVFFA places a duty on owners to prepare and maintain firebreaks, the procedure in this regard, and</p>	<p>DFFE</p>	<p>While no permitting or licensing requirements arise from this legislation, this Act will be</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	<p>the role of adjoining owners and the fire protection association. Provision is also made for the making of firebreaks on the international boundary of the Republic of South Africa. The applicant must ensure that firebreaks are wide and long enough to have a reasonable chance of preventing a veldfire from spreading to or from neighbouring land, it does not cause soil erosion, and it is reasonably free of inflammable material capable of carrying a veldfire across it.</p> <p>Chapter 5 of the Act places a duty on all owners to acquire equipment and have available personnel to fight fires. Every owner on whose land a veldfire may start or burn or from whose land it may spread must have such equipment, protective clothing and trained personnel for extinguishing fires, and ensure that in his or her absence responsible persons are present on or near his or her land who, in the event of fire, will extinguish the fire or assist in doing so, and take all reasonable steps to alert the owners of adjoining land and the relevant fire protection association, if any.</p>		<p>applicable during the construction and operation of the Umbila Emoyeni EGI, in terms of the preparation and maintenance of firebreaks, and the need to provide appropriate equipment and trained personnel for firefighting purposes.</p>
<p>Hazardous Substances Act (No. 15 of 1973) (HAS)</p>	<p>This Act regulates the control of substances that may cause injury, or ill health, or death due to their toxic, corrosive, irritant, strongly sensitising or inflammable nature or the generation of pressure thereby in certain instances and for the control of certain electronic products. To provide for the rating of such substances or products in relation to the degree of danger, to provide for the prohibition and control of the importation, manufacture, sale, use, operation, modification, disposal or dumping of such substances and products.</p> <p>» Group I and II: Any substance or mixture of a substance that might by reason of its toxic, corrosive etc., nature or because it generates pressure through decomposition,</p>	<p>Department of Health (DoH)</p>	<p>It is necessary to identify and list all Group I, II, III, and IV hazardous substances that may be on site and in what operational context they are used, stored or handled. If applicable, a license would be required to be obtained from the DoH.</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
	<p>heat or other means, cause extreme risk of injury etc., can be declared as Group I or Group II substance</p> <ul style="list-style-type: none"> » Group IV: any electronic product, and » Group V: any radioactive material. <p>The use, conveyance, or storage of any hazardous substance (such as distillate fuel) is prohibited without an appropriate license being in force.</p>		
<p>National Environmental Management: Waste Act (No. 59 of 2008) (NEM:WA)</p>	<p>The Minister may by notice in the Gazette publish a list of waste management activities that have, or are likely to have, a detrimental effect on the environment.</p> <p>The Minister may amend the list by –</p> <ul style="list-style-type: none"> » Adding other waste management activities to the list. » Removing waste management activities from the list. » Making other changes to the particulars on the list. <p>In terms of the Regulations published in terms of NEM:WA (GNR 912), a BA or EIA is required to be undertaken for identified listed activities.</p> <p>Any person who stores waste must at least take steps, unless otherwise provided by this Act, to ensure that:</p> <ul style="list-style-type: none"> » The containers in which any waste is stored, are intact and not corroded or in » Any other way rendered unfit for the safe storage of waste. » Adequate measures are taken to prevent accidental spillage or leaking. » The waste cannot be blown away. » Nuisances such as odour, visual impacts and breeding of vectors do not arise, and 	<p>DFFE – Hazardous Waste Mpumalanga DARDL&EA – General Waste</p>	<p>No waste listed activities are triggered by the Umbila Emoyeni EGI, therefore, no Waste Management License is required to be obtained. General and hazardous waste handling, storage and disposal will be required during construction and operation. The National Norms and Standards for the Storage of Waste (GNR 926) published under Section 7(1)(c) of NEM:WA will need to be considered in this regard.</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
<p>National Road Traffic Act (No. 93 of 1996) (NRTA)</p>	<p>» Pollution of the environment and harm to health are prevented.</p> <p>The technical recommendations for highways (TRH 11): "Draft Guidelines for Granting of Exemption Permits for the Conveyance of Abnormal Loads and for other Events on Public Roads" outline the rules and conditions which apply to the transport of abnormal loads and vehicles on public roads and the detailed procedures to be followed in applying for exemption permits are described and discussed.</p> <p>Legal axle load limits and the restrictions imposed on abnormally heavy loads are discussed in relation to the damaging effect on road pavements, bridges, and culverts.</p> <p>The general conditions, limitations, and escort requirements for abnormally dimensioned loads and vehicles are also discussed and reference is made to speed restrictions, power/mass ratio, mass distribution, and general operating conditions for abnormal loads and vehicles. Provision is also made for the granting of permits for all other exemptions from the requirements of the National Road Traffic Act and the relevant Regulations.</p>	<p>South African National Roads Agency (SANRAL) – national roads</p> <p>Mpumalanga Department of Public Works, Roads and Transport</p>	<p>An abnormal load / vehicle permit may be required to transport the various components to site for construction. These include route clearances and permits required for vehicles carrying abnormally heavy or abnormally dimensioned loads and transport vehicles exceeding the dimensional limitations (length) of 22m. Depending on the trailer configuration and height when loaded, some of the on-site substation and BESS components may not meet specified dimensional limitations (height and width) which will require a permit.</p>
Provincial Policies / Legislation			
<p>The Mpumalanga Nature Conservation Act (Act 10 of 1998)</p>	<p>This Act makes provision with respect to nature conservation in the Mpumalanga province. It provides for, among other things, protection of wildlife, hunting, fisheries, protection of endangered fauna and flora as listed in the Convention on international Trade in Endangered Species of Wild Fauna and Flora, the control of harmful animals, freshwater pollution, and enforcement.</p>	<p>Mpumalanga DARDL&EA</p>	<p>A collection/destruction permit must be obtained from Mpumalanga DARDL&EA for the removal of any protected plant or animal species found on site.</p> <p>Ground truthing confirmed 6 Species of Conservation Concern to be present within the study area (refer to Appendix D). These were exclusively protected species from a provincial perspective, and none of them are</p>

Legislation	Applicable Requirements	Relevant Authority	Compliance Requirements
			Red List species. Permits will be required to impact directly on these species.

6.8.1 The IFC Environmental Health and Safety (EHS) Guidelines

The IFC EHS Guidelines are technical reference documents with general and industry specific examples of Good International Industry Practice (GIIP). The following IFC EHS Guidelines have relevance to the proposed project:

- » IFC EHS General Guidelines
- » IFC EHS Guidelines for Electric Power Transmission and Distribution

The General EHS Guidelines are designed to be used together with the relevant Industry Sector EHS Guidelines. The application of the General EHS Guidelines should be tailored to the hazards and risks associated with a project and should take into consideration site-specific variables which may be applicable, such as host country context, assimilative capacity of the environment, and other project factors. In instances where host country regulations differ from the standards presented in the EHS Guidelines, whichever is the more stringent of the two in this regard should be applied.

The General EHS Guidelines include consideration of the following:

- » Environmental:
 - * Air Emissions and Ambient Air Quality
 - * Energy Conservation
 - * Wastewater and Ambient Water Quality
 - * Water Conservation
 - * Hazardous Materials Management
 - * Waste Management
 - * Noise
 - * Contaminated Land
- » Occupational Health and Safety:
 - * General Facility Design and Operation
 - * Communication and Training
 - * Physical Hazards
 - * Chemical Hazards
 - * Biological Hazards
 - * Radiological Hazards
 - * Personal Protective Equipment (PPE)
 - * Special Hazard Environments
 - * Monitoring
- » Community Health and Safety:
 - * Water Quality and Availability
 - * Structural Safety of Project Infrastructure
 - * Life and Fire Safety (L&FS)
 - * Traffic Safety
 - * Transport of Hazardous Materials
 - * Disease Prevention
 - * Emergency Preparedness and Response
- » Construction and Decommissioning:
 - * Environment

- * Occupational Health & Safety
- * Community Health & Safety

CHAPTER 7: DESCRIPTION OF THE AFFECTED ENVIRONMENT

This section of the EIA provides a description of the local environment. This information is provided in order to assist the reader in understanding the possible effects of the proposed project on the environment within which it is proposed to be developed. Aspects of the biophysical, social, and economic environment that could be directly or indirectly affected by, or could affect, the proposed development have been described. This information has been sourced from both existing information available for the area as well as collected field data undertaken by specialist consultants and aims to provide the context within which this S&EIA process is being conducted.

7.1 Legal Requirements as per the EIA Regulations, 2014 (as amended), for the undertaking of an Environmental Impact Assessment

This chapter includes the following information required in terms of the EIA Regulations, 2014 - Appendix 3: Scope of Assessment and Content of Environmental Impact Assessment Reports:

Requirement	Relevant Section
3(1)(h)(iv) the environmental attributes associated with the development footprint alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects	<p>The environmental attributes associated with the development of the Umbila Emoyeni EGI are included as a whole within this chapter. The environmental attributes that are assessed within this chapter include the following:</p> <ul style="list-style-type: none"> » The regional setting of the broader study area and the project site indicates the geographical aspects associated with the Umbila Emoyeni EGI. This is included in Section 7.2. » The climatic conditions present within the broader study area have been included in Section 7.3. » The biophysical characteristics of the project site and the surrounding areas are included in Section 7.4. The characteristics considered are topography and terrain, geology, soils and agricultural potential and the ecological profile which includes the vegetation patterns, listed plant species, critical biodiversity areas and broad-scale processes, freshwater resources, terrestrial fauna, bats, and avifauna. » The heritage and cultural aspects (including archaeology and palaeontology) have been included in Section 7.5. » The visual quality of the surrounding area and the project site has been considered in Section 7.6. » The socio-economic characteristics associated with the broader study area and the project site have been included in Section 7.7.

A more detailed description of each aspect of the affected environment is included within the specialist reports contained within **Appendices D – L**.

7.2. Regional Setting

The Umbila Emoyeni EGI is located ~6km south-east of Bethal and 1km east of Morgenzon, across the Govan Mbeki and Lekwa Local Municipalities within the Gert Sibande District in the Mpumalanga Province.

The Mpumalanga Province, within which the project site is located, is the second-smallest province in South Africa and is located in the north-eastern part of the country, bordering Swaziland and Mozambique (Mpumalanga Spatial Development Framework, 2018). The Mpumalanga Province covers an area of 76 495km² and has a population of 4 335 964, making it one of the most populous provinces in South Africa (Mpumalanga Spatial Development Framework, 2018). Mpumalanga is known for its mining, manufacturing, forestry, and service sectors. The Maputo Corridor, which links Mpumalanga with Gauteng and Maputo in Mozambique, harbours extensive potential in terms of economic development and growth for the region (Mpumalanga Spatial Development Framework, 2018). The Mpumalanga Province comprises of three district municipalities, namely, Ehlanzeni, Gert Sibande and Nkangala (refer to **Figure 7.1**) – which contain seventeen local municipalities collectively, with the project site being located within the Gert Sibande District Municipality.

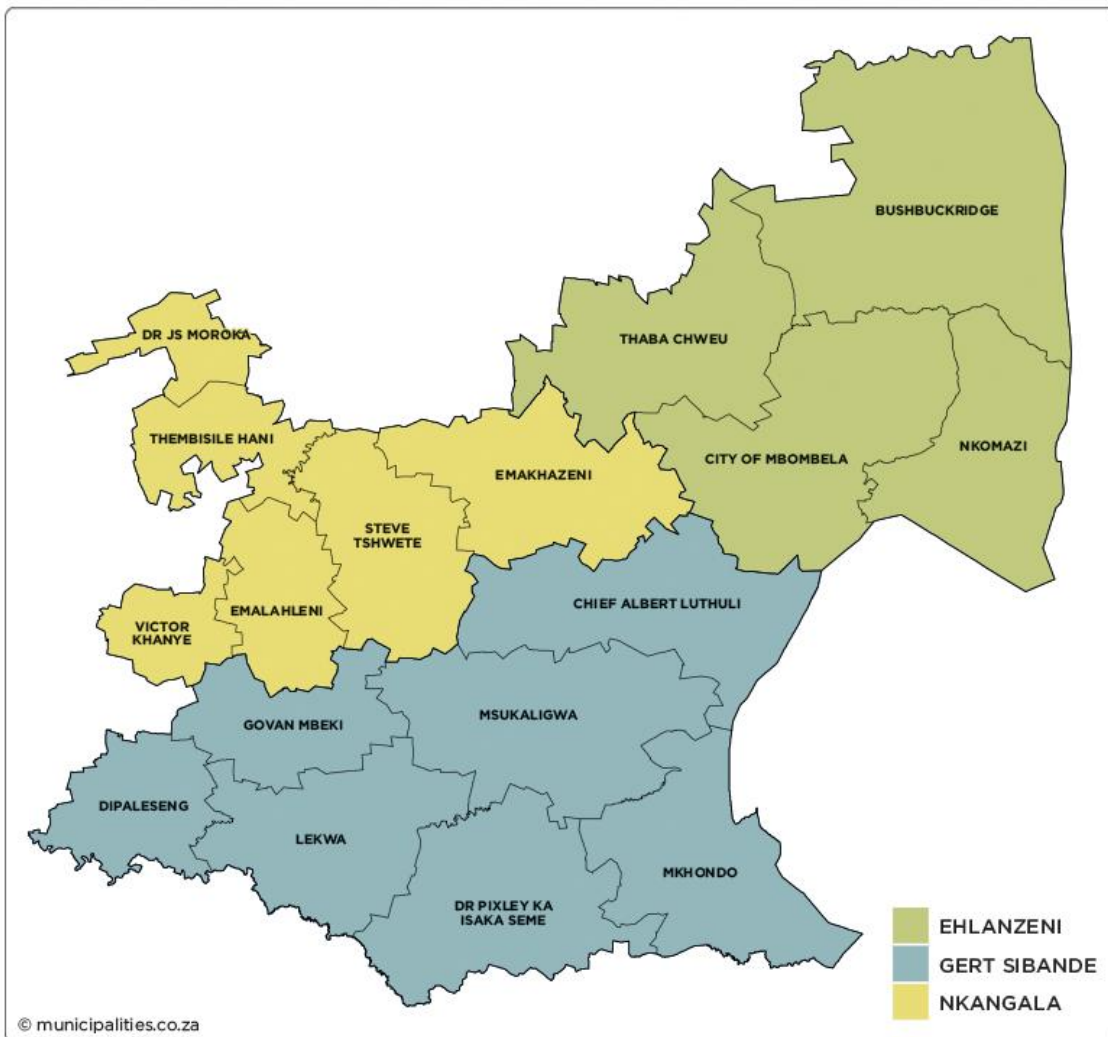


Figure 7.1: District municipalities of the Mpumalanga Province (Source: Municipalities of South Africa)

The Gert Sibande District Municipality is a Category C municipality¹⁰ bordered by the Ehlanzeni and Nkangala District Municipalities to the north, KwaZulu-Natal and the Free State to the south, Swaziland to the east, and Gauteng to the west. It is the largest of the three districts in the Mpumalanga Province, making up almost half of its geographical area. The Gert Sibande District Municipality comprises seven local municipalities, namely, Govan Mbeki, Chief Albert Luthuli, Msukaligwa, Dipaleseng, Mkhondo, Lekwa and Dr Pixley ka Isaka Seme (refer to **Figure 7.2**). According to Stats SA (2016 Community Survey), Gert Sibande's population increased from 1 043 194 in 2011 to 1 135 409 people in 2016. This makes the district the smallest district in terms of population amongst the three districts in the province. The economy of the Gert Sibande District Municipality is driven by manufacturing, agriculture, transport, trade, community services, construction, electricity, finance and mining.



Figure 7.2: Local municipalities of the Gert Sibande District Municipality (Source: Municipalities of South Africa)

The Govan Mbeki Local Municipality has the largest underground coal mining complex in the world, which makes it an important strategic area within the national context. It covers an aerial extent of 2 955km² and is bordered by the Nkangala District in the north, Dipaleseng and Lekwa in the south, Msukaligwa in the east, and the Gauteng Province in the west. It is one of the smallest of seven municipalities that make up the district, accounting for 9% of its geographical area. Secunda is the seat of the municipality, as well as the seat of the district municipality. According to Stats SA (2011), the population in Govan Mbeki Local Municipality's sits at 340 091. Primary economic sectors in the municipality include mining, manufacturing, trade, and construction.

The Lekwa Local Municipality is Category B municipality situated within the Gert Sibande District in the Mpumalanga Province. It is one of seven municipalities in the district. It was established on 05 December 2000 after the amalgamation of three former Transitional Local Councils, namely, Standerton, Sakhile and Morgenzon. It is located in the south-west of the district, with immediate entrances to the KwaZulu-Natal,

¹⁰ A municipality that has municipal executive and legislative authority in an area that includes more than one municipality.

Gauteng and Free State Provinces. Newcastle, Heidelberg and Vrede are respective immediate entrances. Standerton serves as an urban node, whilst Morgenzon, which is 45km north-east of Standerton, serves as a satellite node.

The Lekwa Municipality lies on the large open plains of the Highveld region, which is characterised by tall grass, and it is traversed by the Vaal River, which flows in a western direction. The municipality is named after the Vaal River, which is commonly known as Lekwa (the Sesotho name for the Vaal River). Agriculture, forestry and fishing constitute about 30% of the Lekwa Local Municipality's economy.

7.3. Climatic Conditions

The region within which the project site is located is characterised by summer rainfall and experiences a mean annual precipitation of up to 662mm. The region is also characterised by high and low extreme temperatures during the summer and winter, respectively, with frost occurring frequently (refer to **Figure 7.3**).

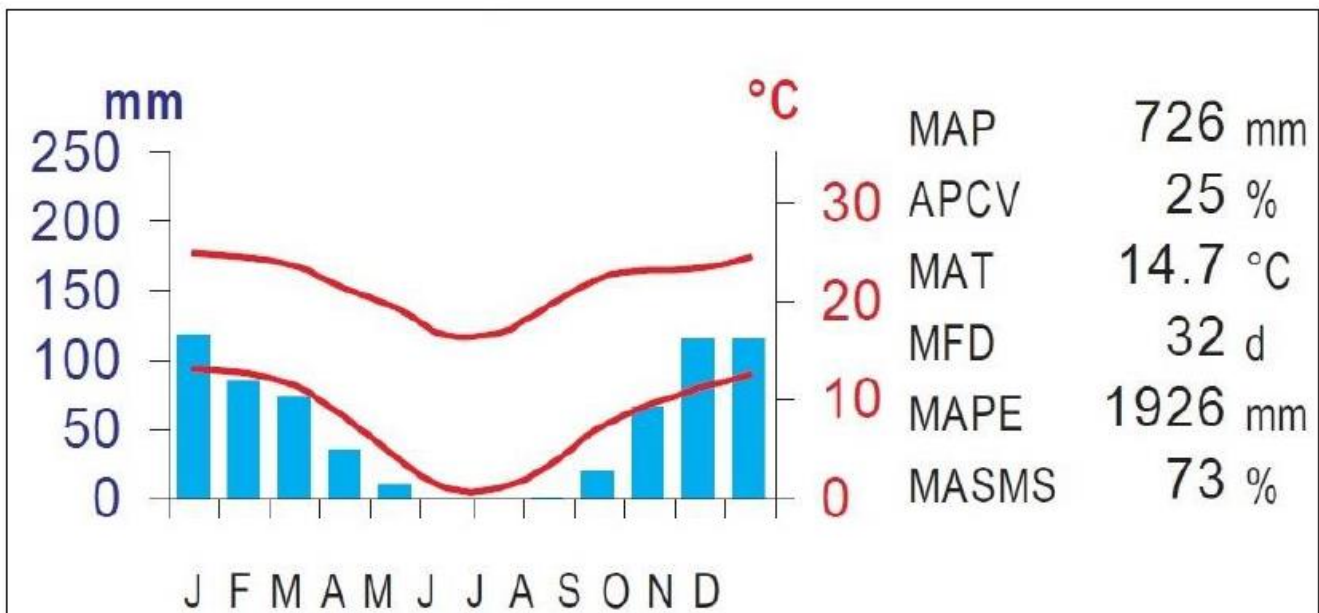


Figure 7.3: Climatic graph for the broader region within which the proposed project site is located

7.4. Biophysical Characteristics of the Project Site

The following section provides an overview and description of the biophysical characteristics of the study area and has been informed by specialist studies (**Appendix D - L**) undertaken for this Scoping Report.

7.4.1. Topographical profile

The project site occurs on land that ranges in elevation from approximately 1 581m to 1 778m. The general landform of the project site is undulating and is comprised of a series of similar size rounded ridgelines that extend approximately 20 – 30m above broad valley lines. The valley lines all feed into the Blebokspruit, which flows in a north to south direction approximately 8.5km to the west of the proposed site. The Blesbokspruit flows into the Vaal River approximately 15km to the south-west of the site.

The slope percentage of the project site has been calculated and is illustrated in **Figure 7.4**. Most of the project site is characterised by a slope percentage between 0 and 4%, with some smaller patches within the project site characterised by a slope percentage ranging from 4 to 81%. This illustration indicates a non-uniform topography in scattered areas. The majority of the site is however characterised by a gentle slope.

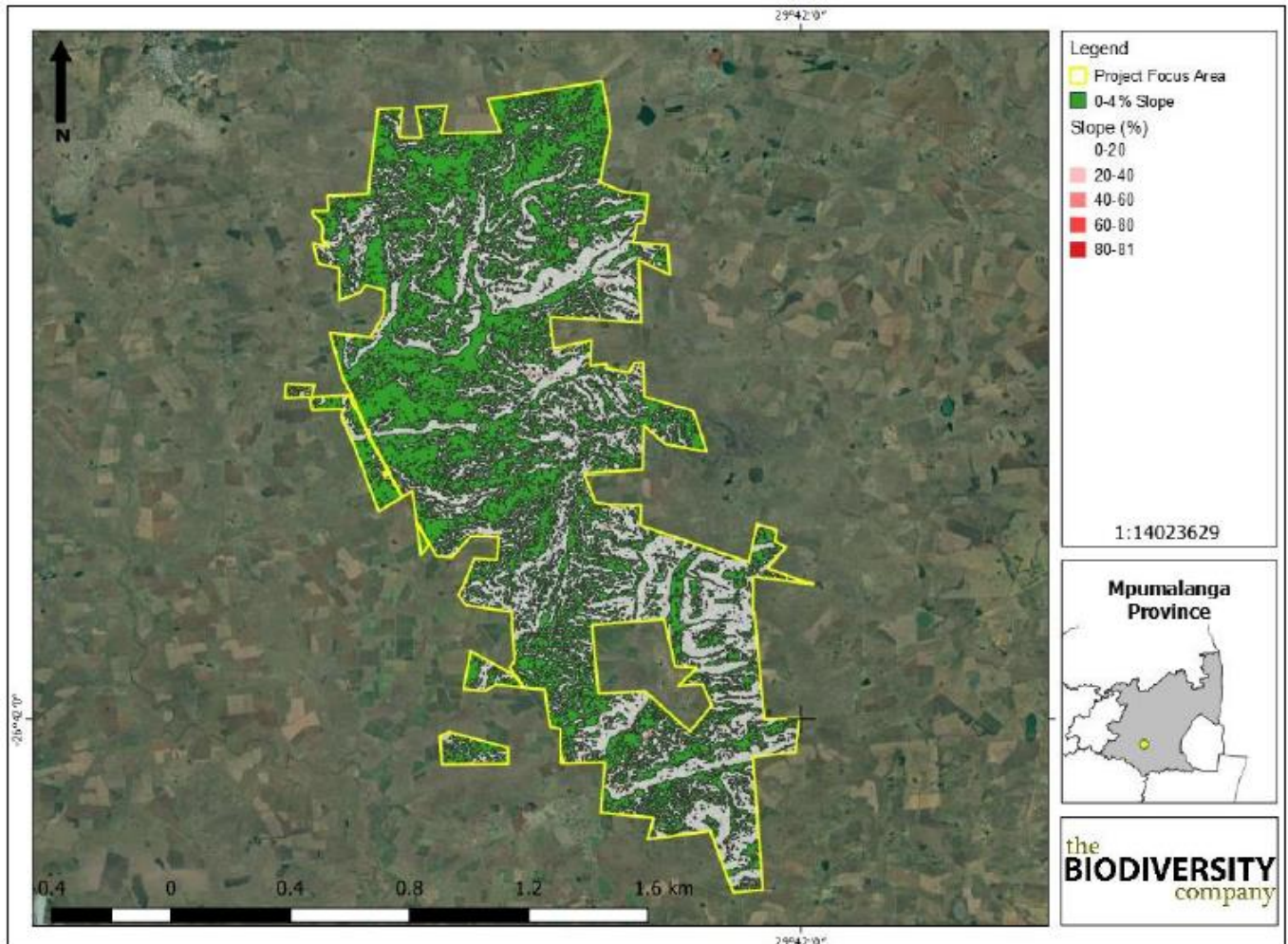


Figure 7.4: Slope percentage calculated for the project site within which the Umbila Emoyeni EGI is proposed

7.4.2. Geology, Soils and Agricultural Potential

Geological Setting

The geology of the project site is characterised by the Madzaringwe Formation shale, mudstone and sandstone from the Karoo Supergroup or the Karoo Suite dolerites which feature prominently in this area. To the west, the rocks of the Ventersdorp, old Transvaal and Witwatersrand Supergroups are significant with the south being characterised by the Volksrust Formation from the Karoo Supergroup. The geology of the project site for the Umbila Emoyeni EGI site is indicated in **Figure 7.5**.

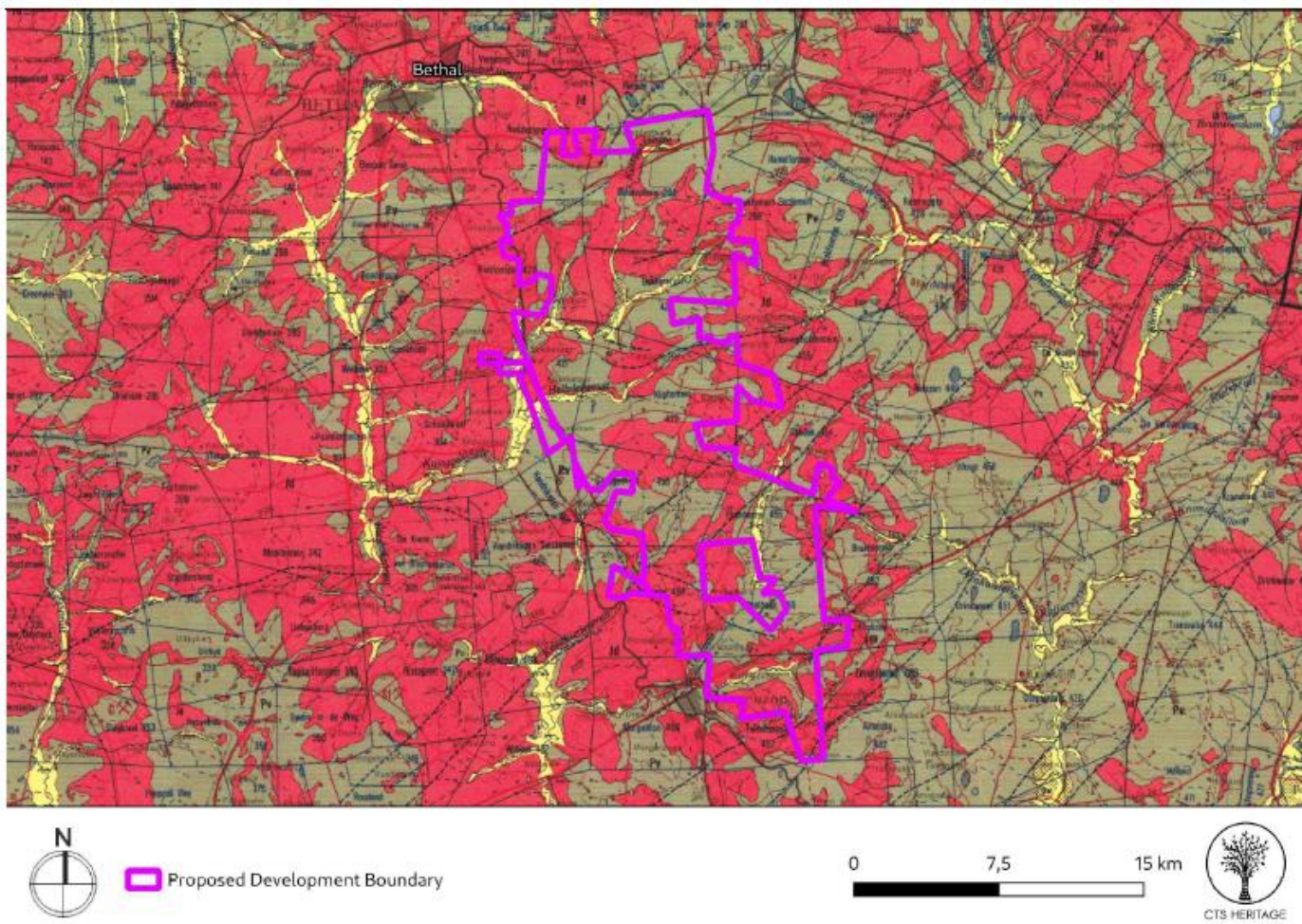


Figure 7.5: Extract from the CGS 2628 East Rand Map indicating the geological setting of the project site

Land Type, Soil Forms and Land Capability

According to the land type database, the project site is characterised by the Dc 3, Ea 20, Ea 21 and the Ea 22 land types (refer to **Figure 7.6**). The Dc land type is characterised by Prisma-cutanic and/or pedocutanic diagnostic horizons, with the addition of one or more of the following: Vertic, melanic and red structured diagnostic horizons. The Ea land type consists of one or more of the following soils: Vertic, Melanic, and red structured diagnostic horizons, of which these soils are all undifferentiated.

The various soil forms expected throughout the project site are commonly associated with high land capabilities. Even though the soil depth, texture and permeability of these soils ensure high land capability, the climatic capability of the area often reduces the land potential considerably. Therefore, very few areas characterised by “High” land potential are expected.

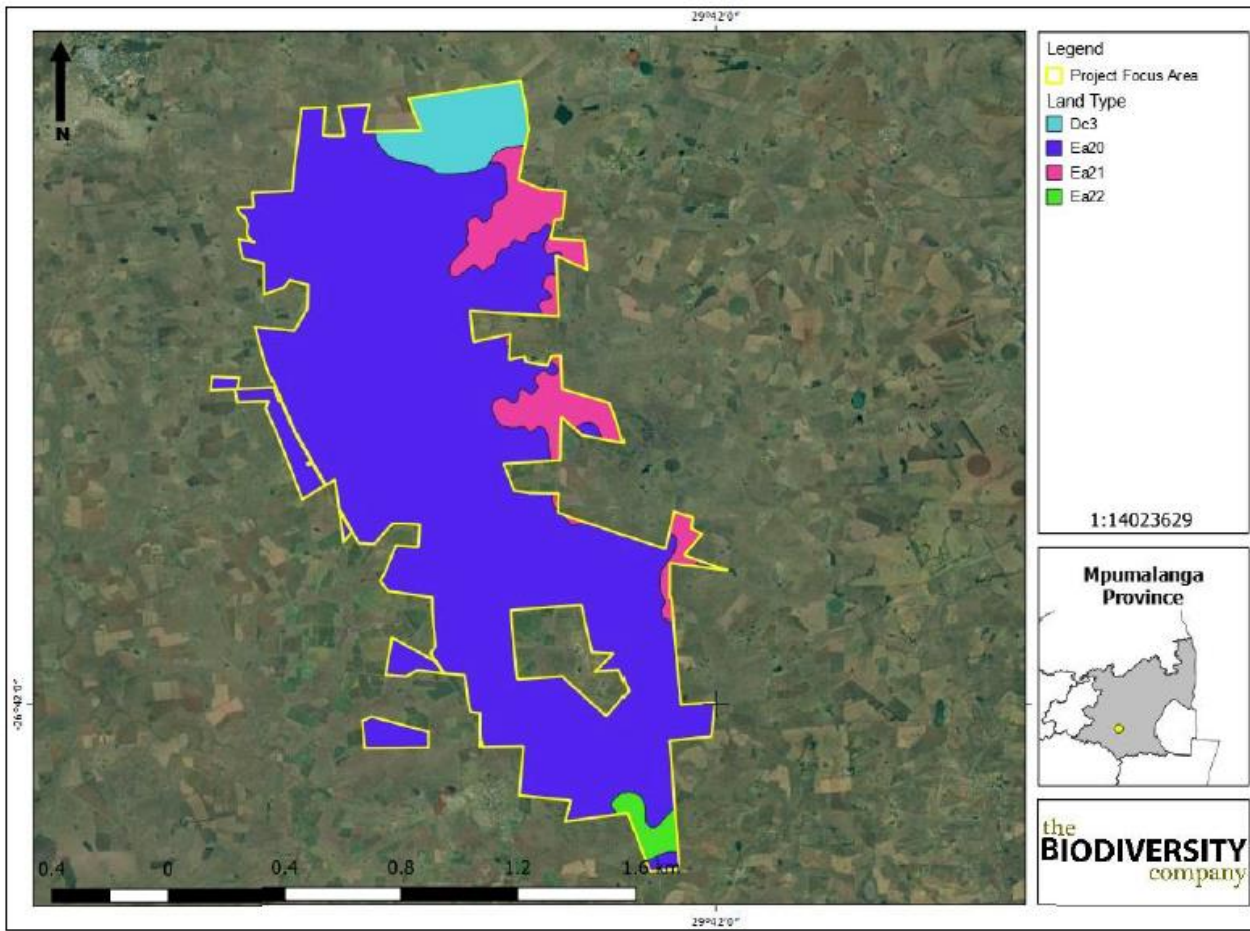


Figure 7.6: Land types present within the project site for the Umbila Emoyeni EGI

Soil Forms

Soil profiles were studied up to a depth of 1.2m to identify specific diagnostic horizons which are vital in the soil classification process as well as determining the agricultural potential and land capability. The most sensitive soil forms have been considered. Five diagnostic horizons were identified within the project site, namely, orthic topsoil, lithic horizon, hard rock horizon, red apedal horizon, and red structured horizon.

During the stie survey undertaken as part of the soil assessment, various soil forms were identified. The soil forms are described in **Table 7.1** according to depth, clay percentage, indications of surface crusting, signs of wetness and percentage rock.

Table 7.1: Summary of soils identified within the project site

	Topsoil					Subsoil A				Subsoil B			
	Depth (mm)	Clay (%)	Signs of wetness	Rock %	Surface crusting	Depth (mm)	Clay (%)	Signs of wetness	Rock %	Depth (mm)	Clay (%)	Signs of wetness	Rock %
Vaalbos 1221(15)	0-300	0-15	None	0	None	300-400	15-30	None	10	400-500	15-30		30
Avalon 1220(15)	0-300	0-15	None	0	None	300-700	15-35	None	0	700-1200 (+)	>35	Plinthic conditions	

	Topsoil					Subsoil A				Subsoil B			
	Depth (mm)	Clay (%)	Signs of wetness	Rock %	Surface crusting	Depth (mm)	Clay (%)	Signs of wetness	Rock %	Depth (mm)	Clay (%)	Signs of wetness	Rock %
Ermelo 1220(15)	0-300	0-15	None	0	None	300-1 200 (+)	0-15	None	0	N/A			
Tukulu 1120 (15)	0-300	0-15	None	0	None	300-800	0-15	None	0	800-1200	>35	Present	

Land Capability

Land capability is determined by the physical features of the landscape, including the soils present. Land capability is defined by the most intensive long-term use of land under rain-fed conditions. Land capability is divided into eight classes, and these may be divided into three capability groups. **Table 7.2** shows how the land classes and groups are arranged in order of decreasing capability and ranges of use. The risk of use increases from class I to class VIII.

Table 8.2: Land capability class and intensity of use

Land Capability Class	Increased Intensity of Use											Land Capability Groups
	W	F	L	MG	I	L	MC	I	VI			
I			G		G	C		C	C			Arable Land
II			G		G	C		C				
III			G		G	C						
IV			G		G	C						
V			G									Grazing Land
VI			G									
VII			G									
VIII												Wildlife
W - Wildlife		MG - Moderate Grazing				MC - Moderate Cultivation						
F- Forestry		IG - Intensive Grazing				IC - Intensive Cultivation						
LG - Light Grazing		LC - Light Cultivation				VIC - Very Intensive Cultivation						

The land capability of the most sensitive soils within the project site falls within classes 3, 4 and 5 (refer to **Table 7.3**).

Table 8.3: Land capability for the soils within the project site

Land Capability Class	Definition of Class	Conservation Need	Use-Suitability	Land Capability Group	Sensitivity
3	Moderate limitations. Some erosion hazard	Special conservation practice and tillage methods	Rotation crops and ley (50%)	Arable	High
4	Severe limitations. Low arable potential.	Intensive conservation practice	Long term leys (75%)	Arable	Moderate
5	Water course and land with wetness limitations	Protection and control of water table	Improved pastures, suitable for wildlife	Grazing	Low

Agricultural/Land Potential

Agricultural/land potential is determined by combining the land capability results and the climatic capability of the region as shown in **Table 7.4**. Climatic capability is determined by means of the Mean Annual Precipitation (MAP) and annual Class A pan. Descriptions of the different land potential classes are provided in **Table 7.5**.

Table 7.4: The combination table for land potential classification

Land capability class	Climate capability class							
	C1	C2	C3	C4	C5	C6	C7	C8
I	L1	L1	L2	L2	L3	L3	L4	L4
II	L1	L2	L2	L3	L3	L4	L4	L5
III	L2	L2	L3	L3	L4	L4	L5	L6
IV	L2	L3	L3	L4	L4	L5	L5	L6
V	Vlei	Vlei	Vlei	Vlei	Vlei	Vlei	Vlei	Vlei
VI	L4	L4	L5	L5	L5	L6	L6	L7
VII	L5	L5	L6	L6	L7	L7	L7	L8
VIII	L6	L6	L7	L7	L8	L8	L8	L8

Table 7.5: Description of the land potential classes

Land potential	Description of land potential class
L1	Very high potential: No limitations. Appropriate contour protection must be implemented and inspected.
L2	High potential: Very infrequent and/or minor limitations due to soil, slope, temperatures or rainfall. Appropriate contour protection must be implemented and inspected.
L3	Good potential: Infrequent and/or moderate limitations due to soil, slope, temperatures or rainfall. Appropriate contour protection must be implemented and inspected.
L4	Moderate potential: Moderately regular and/or severe to moderate limitations due to soil, slope, temperatures or rainfall. Appropriate permission is required before ploughing virgin land.

Land potential	Description of land potential class
L5	Restricted potential: Regular and/or severe to moderate limitations due to soil, slope, temperatures or rainfall.
L6	Very restricted potential: Regular and/or severe limitations due to soil, slope, temperatures or rainfall. Non-arable
L7	Low potential: Severe limitations due to soil, slope, temperatures or rainfall. Non-arable
L8	Very low potential: Very severe limitations due to soil, slope, temperatures or rainfall. Non-arable

From the three land capability classes (i.e., 3, 4 and 5), two land potential levels have been determined. Land capability III and IV have been reduced to a land potential level L5 due to climatic limitations. The land capability V has been allocated a land potential “Vle1” considering its hydromorphic characteristics.

7.4.3. Land Use

The predominant land use within the project site is farming. The study area consists of a mosaic of buildings/structures, active farmland (“agriculture”), fallow land (abandoned farmlands which consist of secondary vegetation; “fallow”), natural grasslands, and freshwater resource features or drainage areas (which is comprised of small streams, wetlands, shallow pans and depressions, and artificial dams).

Farming practices comprise a mixture of cultivation (mainly maize with some soya bean cultivation), livestock farming (predominantly cattle on natural to near-natural grasslands and planted pastures), and to a lesser extent game farming.

In spite of the rural and natural character of the area within which the project site is proposed, there are major high voltage overhead power lines that traverse the project site, namely, the Camden Sol 2 400kV power line, and the Camden Tutuka 400kV power line.

7.4.4. Ecological Profile of the Broader Study Area and the Project Site

i. Broad-Scale Vegetation Patterns

The national vegetation map for the project site is depicted in **Figure 7.7**. The entire study area is mapped as Soweto Highveld Grassland (Gm 8), but other vegetation types occur nearby, namely Amersfoort Highveld Clay Grassland (Gm 13), Eastern Highveld Grassland (Gm 12).

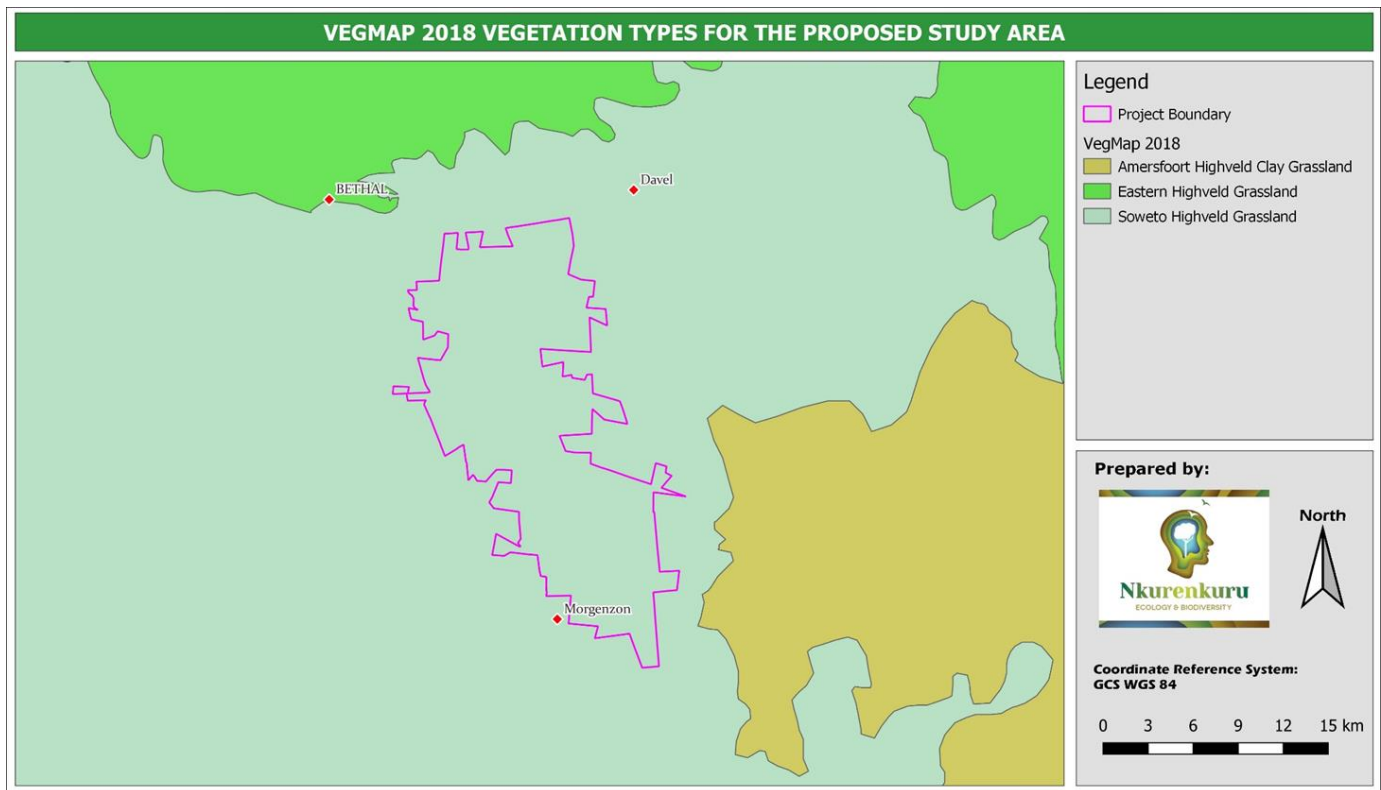


Figure 7.7: Map illustrating the different vegetation types, according to VegMap 2018, for the study area, as well as the general region.

Soweto Highveld Grassland (Gm 8)

This vegetation type is distributed mainly in Mpumalanga and Gauteng, with small outliers in the Free State and North-West Provinces. It has an altitudinal range of 1 420 – 1 760m. It is distributed in a broad band roughly delimited by the N17 road between Ermelo and Johannesburg in the north, Perdekop in the southeast, and the Vaal River in the south. The vegetation type extends further westwards along the southern edge of the Johannesburg Dome with parts of Soweto, and as far as Randfontein. In southern Gauteng, it includes parts of Vanderbijlpark and Vereeniging, as well as Sasolburg in the northern Free State.

The vegetation type is characterised by gentle to moderate undulating landscapes on the Highveld plateau, and supports short to medium-high, dense, tufted grassland, which is dominated by *Themeda triandra* together with a variety of other grasses, such as *Elionurus muticus*, *Eragrostis racemosa*, *Heteropogon contortus*, and *Tristachya leucothrix*. In undisturbed areas, scattered small wetlands, narrow stream alluvia, pans, and occasional ridges or rocky outcrops occur as a mosaic within the grassland.

Shale, sandstone, or mudstone of the Madzaringwe Formation (Karoo Supergroup) or the intrusive Karoo Suite dolerites are characteristic of this vegetation type. The Volksrust Formation (Karoo Supergroup) is found in the south, while rocks of the older Transvaal, Ventersdorp, and Witwatersrand Supergroups are significant in the west. The soils are deep and reddish on flat plains, and are typically of the Ea, Ba, and Bb land types.

The vegetation type receives summer rainfall with a MAP of about 662 mm. It has a cool temperate climate with high extremes between maximum summer and minimum winter temperatures, with a frequent occurrence of frost and large thermic diurnal differences, especially in autumn and spring.

The unit is classified as Endangered with a target of protection of 24%. Only a few patches are statutorily conserved in the Waldrift, Krugersdorp, Leeuwkuil, Suikerbosrand, and Rolfe's Pan Nature Reserves, or privately conserved in the Johanna Jacobs, Tweefontein, Gert Jacobs, Nikolaas, and Avalon Nature Reserves, as well as the Heidelberg Natural Heritage Site. Almost half of the area already transformed by cultivation, urban sprawl, mining, and road infrastructure. Some areas have been flooded by dams, notably the Grootdraai, Leeuikuil, Trichardtsfontein, Vaal, and Willem Brummer dams. Erosion is generally very low; only about 93%.

Table 7.6: Key species associated with Soweto Highveld Grassland (Gm 8)

IMPORTANT SPECIES	
Growth Form (d = Dominant)	Key Species
Graminoids	<i>Andropogon appendiculatus</i> (d), <i>Brachiaria serrata</i> (d), <i>Cymbopogon pospischilii</i> (d), <i>Cynodon dactylon</i> (d), <i>Elionurus muticus</i> (d), <i>Eragrostis capensis</i> (d), <i>E. chloromelas</i> (d), <i>E. curvula</i> (d), <i>E. plana</i> (d), <i>E. planiculmis</i> (d), <i>E. racemosa</i> (d), <i>Heteropogon contortus</i> (d), <i>Hyparrhenia hirta</i> (d), <i>Setaria nigrirostris</i> (d), <i>S. sphacelata</i> (d), <i>Themeda triandra</i> (d), <i>Tristachya leucothrix</i> (d), <i>Andropogon schirensis</i> , <i>Aristida adscensionis</i> , <i>A. bipartita</i> , <i>A. congesta</i> , <i>A. junciformis</i> subsp. <i>galpinii</i> , <i>Cymbopogon caesius</i> , <i>Digitaria diagonalis</i> , <i>Diheteropogon amplexans</i> , <i>Eragrostis micrantha</i> , <i>E. superba</i> , <i>Harpochloa falx</i> , <i>Microchloa caffra</i> , <i>Paspalum dilatatum</i> .
Herbs	<i>Hermannia depressa</i> (d), <i>Acalypha angustata</i> , <i>Berkheya setifera</i> , <i>Dicoma anomala</i> , <i>Euryops gilfillanii</i> , <i>Geigeria aspera</i> var. <i>aspera</i> , <i>Graderia subintegra</i> , <i>Haplocarpha scaposa</i> , <i>Helichrysum miconiifolium</i> , <i>H. nudifolium</i> var. <i>nudifolium</i> , <i>H. rugosum</i> , <i>Hibiscus pusillus</i> , <i>Justicia anagalloides</i> , <i>Lippia scaberrima</i> , <i>Rhynchosia effusa</i> , <i>Schistostephium crataegifolium</i> , <i>Seago densiflora</i> , <i>Senecio coronatus</i> , <i>Vernonia oligocephala</i> , <i>Wahlenbergia undulata</i> .
Geophytic Herbs	<i>Haemanthus humilis</i> subsp. <i>hirsutus</i> , <i>H. montanus</i> .
Herbaceous Climber	<i>Rhynchosia totta</i> .
Low Shrubs	<i>Anthospermum hispidulum</i> , <i>A. rigidum</i> subsp. <i>pumilum</i> , <i>Berkheya annectens</i> , <i>Felicia muricata</i> , <i>Ziziphus zeyheriana</i> .

Eastern Highveld Grassland (Gm 8)

This vegetation type is distributed throughout Mpumalanga and Gauteng Provinces, and occurs as plains between Belfast in the east, and the eastern side of Johannesburg in the west, and extends southwards to Bethal, Ermelo, and west of Piet Retief. The vegetation type has an altitudinal range of 1 520 – 1 780m, but some parts are as low as 1 300m.

The vegetation type consists of slight to moderate undulating plains and includes low hills and pan depressions. The vegetation is short, dense grassland dominated by grasses of the genera *Aristida*, *Digitaria*, *Eragrostis*, *Themeda*, *Tristachya*. Small, scattered rocky outcrops have wiry, sour grasses and some woody species, such as *Acacia caffra*, *Celtis africana*, *Diospyros lycioides* subsp. *lycioides*, *Parinari capensis*, *Protea caffra*, *P. welwitschii*, and *Searsia magalimontanum*.

Red to yellow sandy soils of the Ba and Bb land types dominate on shales and sandstones of the Madzaringwe Formation (Karoo Supergroup), and two dominant land types are found, namely Bb (65%) and Ba (30%).

The vegetation type has a strong seasonal summer rainfall, with very dry winters. The MAP ranges from 650 – 900 mm, with an average of 726 mm. Rainfall is relatively uniform across most of this vegetation type, but increases significantly in the extreme southeast, which is evidenced from the MAP coefficient of variation of 25% across most of the unit, which drops to 21% in the east and southeast. Frost incidence ranges from 13 – 42 days, but is higher at higher elevations.

The unit is classified as Endangered with a target of protection of 24%. Only a very small fraction is conserved in statutory reserves such as Nootgedacht Dam and Jericho Darn Nature Reserves, or in private reserves such as Holkrans, Kransbank, and Morgenstond. About 44% has been transformed primarily by cultivation, plantations, mines, urbanisation, and by building of dams. Cultivation may have had a more extensive impact, as indicated by landcover data. No serious alien invasions are reported, but *Acacia mearnsii* can become dominant in disturbed sites. Erosion is very low.

Table 7.7: Key species associated with Eastern Highveld Grassland (Gm 12)

DOMINANT SPECIES	
Growth Form (d = Dominant)	Key Species
Graminoids	<i>Aristida aequiglumis</i> (d), <i>A. congesta</i> (d), <i>A. junciformis</i> subsp. <i>galpinii</i> (d), <i>Brachiaria serrata</i> (d), <i>Cynodon dactylon</i> (d), <i>Digitaria monodactyla</i> (d), <i>D. tricholaenoides</i> (d), <i>Elyonurus muticus</i> (d), <i>Eragrostis chloromelas</i> (d), <i>E. curvula</i> (d), <i>E. plana</i> (d), <i>E. racemosa</i> (d), <i>E. sclerantha</i> (d), <i>Heteropogon contortus</i> (d), <i>Loudetia simplex</i> (d), <i>Microchloa caffra</i> (d), <i>Monocymbium cerasiiforme</i> (d), <i>Setaria sphacelata</i> (d), <i>Sporobolus africanus</i> (d), <i>S. pectinatus</i> (d), <i>Themeda triandra</i> (d), <i>Trachypogon spicatus</i> (d), <i>Tristachya leucothrix</i> (d), <i>T. rehmannii</i> (d), <i>Alloteropsis semialata</i> subsp. <i>eckloniana</i> , <i>Andropogon appendiculatus</i> , <i>A. schirensis</i> , <i>Bewisia biflora</i> , <i>Ctenium concinnum</i> , <i>Diheteropogon amplexans</i> , <i>Eragrostis capensis</i> , <i>E. gummiflua</i> , <i>E. patentissima</i> , <i>Harpochloa fax</i> , <i>Panicum natalense</i> , <i>Rendlia altera</i> , <i>Schizachyrium sanguineum</i> , <i>Setaria nigrirostris</i> , <i>Urelytrum agropyroides</i> .
Herbs	<i>Berkheya setifera</i> (d), <i>Haplocarpha scaposa</i> (d), <i>Justicia anagalloides</i> (d), <i>Pelargonium luridum</i> (d), <i>Acalypha angustata</i> , <i>Chamaecrista mimosoides</i> , <i>Dicoma anomala</i> , <i>Eryops gilfillanii</i> , <i>E. transvaalensis</i> subsp. <i>setilobus</i> , <i>Helichrysum aureonitens</i> , <i>H. caespititium</i> , <i>H. callicomum</i> , <i>H. oreophilum</i> , <i>H. rugulosum</i> , <i>Ipomoea crassipes</i> , <i>Pentanisia prunelloides</i> subsp. <i>latifolia</i> , <i>Seago densiflora</i> , <i>Senecio coronatus</i> , <i>Vernonia oligocephala</i> , <i>Wahlenbergia undulata</i> .
Geophytic Herbs	<i>Gladiolus crassifolius</i> , <i>Haemanthus humilis</i> subsp. <i>hirsutus</i> , <i>Hypoxis rigidula</i> var. <i>pilosissima</i> , <i>Ledebouria ovatifolia</i> .
Succulent Herb	<i>Aloe ecklonis</i> .
Low Shrubs	<i>Anthospermum rigidum</i> subsp. <i>pumilum</i> , <i>Stoebe plumosa</i> .

Amersfoort Highveld Clay Grassland (Gm 13)

This vegetation type is distributed throughout Mpumalanga and Kwa-Zulu Natal Provinces, extending in a north-south band from south of Ermelo, down through Amersfoort to the Memel area in south. The vegetation type has an altitudinal range of 1 580 – 1 860m.

The vegetation type is comprised of undulating grassland plains, with small, scattered patches of dolerite outcrops in some areas. The vegetation is comprised of a short, closed grassland cover, largely dominated by a dense *Themeda triandra* sward, often severely grazed to form a short lawn.

The unit is characterised by vertic clay soils derived from dolerite that is intrusive in the Karoo sediments of the Madzaringwe Formation in the north and the Volksrust Formation and the Adelaide Subgroup in the south. The Dominant land type is Ca, while the Ea land type is of subordinate importance.

The unit receives rainfall mainly in early summer, which ranges from 620 mm in the west to 830 mm in the east, and it has a MAP of 694 mm. Temperatures are higher in the west than the east, and the vegetation type has a MAT of 14°C. Winters are cold and summers are mild, and frost incidence is very high.

The unit is classified as Vulnerable with a target of protection of 27%. None of the vegetation type is protected. About 25% of the vegetation type is transformed, mostly by cultivation (22%). The area is not suited to afforestation. Silver and black wattle (*Acacia*), and *Salix babylonica* invade drainage areas. Erosion potential is very low (57%) and low (40%).

Overgrazing leads to invasion of *Stoebe vulgaris*. Parts of this unit were once cultivated and now lie fallow and have been left to revegetate with pioneer species. These transformed areas are not picked up by satellite for transformation coverage and the percentage of grasslands still in a natural state may be underestimated.

Table 7.8: Key species associated with Amersfoort Highveld Clay Grassland (Gm 13)

DOMINANT SPECIES	
Growth Form (d = Dominant)	Key Species
Graminoids	<i>Andropogon appendiculatus</i> (d), <i>Brachiaria serrata</i> (d), <i>Digitaria monodactyla</i> (d), <i>D. tricholaenoides</i> (d), <i>Elionurus muticus</i> (d), <i>Eragrostis capensis</i> (d), <i>E. chloromelas</i> (d), <i>E. plana</i> (d), <i>E. racemosa</i> (d), <i>Harpochloa falx</i> (d), <i>Heteropogon contortus</i> (d), <i>Microchloa caffra</i> (d), <i>Panicum natalense</i> (d), <i>Setaria nigrirostris</i> (d), <i>S. sphacelata</i> (d), <i>Themeda triandra</i> (d), <i>Trichoneura grandiglumis</i> (d), <i>Tristachya leucothrix</i> (d), <i>Abildgaardia ovata</i> , <i>Andropogon schirensis</i> , <i>Aristida bipartita</i> , <i>A. congesta</i> , <i>A. junciformis</i> subsp. <i>galpinii</i> , <i>A. stipitata</i> subsp. <i>graciliflora</i> , <i>Bulbostylis contexta</i> , <i>Chloris virgata</i> , <i>Cymbopogon caesius</i> , <i>C. pospischilii</i> , <i>Cynodon dactylon</i> , <i>Digitaria diagonalis</i> , <i>D. ternata</i> , <i>Diheteropogon amplectens</i> , <i>Eragrostis curvula</i> , <i>Koeleria capensis</i> , <i>Panicum coloratum</i> , <i>Setaria incrassata</i> .
Herbs	<i>Berkheya setifera</i> (d), <i>Vernonia natalensis</i> , <i>V. oligocephala</i> (d), <i>Acalypha peduncularis</i> , <i>A. wilmsii</i> , <i>Berkheya insignis</i> , <i>B. pinnatifida</i> , <i>Crabbea acaulis</i> , <i>Cynoglossum hispidum</i> , <i>Dicoma anomala</i> , <i>Haplocarpha scaposa</i> , <i>Helichrysum caespitium</i> , <i>H. rugulosum</i> , <i>Hermannia coccocarpa</i> , <i>H. depressa</i> , <i>H. transvaalensis</i> ,

DOMINANT SPECIES	
Growth Form (d = Dominant)	Key Species
	<i>Ipomoea crassipes</i> , <i>I. oblongata</i> , <i>Jamesbrittenia silenoides</i> , <i>Pelargonium luridum</i> , <i>Pentanisia prunelloides</i> subsp. <i>latifolia</i> , <i>Peucedanum magalismsontanum</i> , <i>Pseudognaphalium luteoalbum</i> , <i>Rhynchosia effusa</i> , <i>Salvia repens</i> , <i>Schistostephium crataegifolium</i> , <i>Sonchus nanus</i> , <i>Wahlenbergia undulata</i> .
Herbaceous Climber	<i>Rhynchosia totta</i> .
Geophytic Herbs	<i>Boophone disticha</i> , <i>Eucomis autumnalis</i> subsp. <i>clavata</i> , <i>Hypoxis villosa</i> var. <i>obliqua</i> , <i>Zantedeschia albomaculata</i> subsp. <i>macrocarpa</i> .
Tall Shrubs	<i>Diospyros austroafricana</i> , <i>D. lycioides</i> subsp. <i>guerkei</i> .
Low Shrubs	<i>Anthospermum rigidum</i> subsp. <i>pumilum</i> (d), <i>Helichrysum melanacme</i> (d), <i>Chaetacanthus costatus</i> , <i>Euphorbia striata</i> var. <i>cuspidata</i> , <i>Gnidia burchellii</i> , <i>G. capitata</i> , <i>Polygala uncinata</i> , <i>Searsia discolor</i> .
Succulent Shrub	<i>Euphorbia clavarioides</i> var. <i>truncata</i> .

ii. Fine-Scale Vegetation Patterns

Ground truthing indicated the following fine-scale vegetation patterns within the study area:

- » **Drainage areas**, such as wetlands, temporary seepages, and ephemeral rivers, among others, comprised an approximate total of 9% (\pm 2 442 ha out of 28 856 ha) of the study area. Since much of these areas are seasonally waterlogged, they are characterised by heavy, black clay soils without many rocks. Some areas have exposed underlying sandstone banks. The type did not have any native trees, except for scattered individuals of *Salix babylonica* along larger river channels. The shrub layer was approximately 50 cm in height, with the forb layer being 50 cm and the graminoid layer 90 cm.
- » **Fallow land**, areas that were historically used for agriculture, but have subsequently been left to restore passively. It comprised an approximate total of 8% (\pm 2 190 ha out of 28 856 ha) of the study area. Fallow land condition depends on variety of factors, such as the history, intensity, and type of agricultural activities, as well as the time since cessation of activities, among other things. Therefore, although fallow lands are usually degraded and consist of secondary vegetation, they often revegetate to form important zones that support various types of biodiversity. Fallow lands can often be considered as Ecological Support Areas (ESA). These areas serve as habitats for SoCC, as well as other keystone or ecologically important species. Although it would take considerable time for fallow lands to restore to previous natural conditions (this might even have to involve some measure of active restoration), such areas often passively restore to a state that closely replicates that of the original, pristine conditions, even if only functionally. Such areas can function as buffer zones and/or corridors, adjacent to natural grasslands and drainage areas, that can be utilized by animal species, and could also function as reservoirs for certain native plant species. Numerous native species, shared with other natural types, were found in the fallow lands of the study area.
- » **Natural areas**, which comprised the largest part of the study area with an approximate total of 45% (\pm 12 814 ha out of 28 856 ha). A couple of variations were found within the broader scope of these natural areas, including areas of natural clay, dolerite, loam soil, shallow rock turf, and sandstone, all of which are grassland variations. By far the most abundant of these areas were natural clayey grassland. The

other areas often integrate seamlessly with such clayey grasslands, and as such are difficult to map with accuracy on a fine scale.

- » **Disturbed areas** are those that experience, or have recently experienced, considerable anthropogenic disturbance (apart from the fallow lands discussed above, which have generally been abandoned for quite some time). These areas include, but are not limited to, manmade dams, kraals, ruins/murals, roadsides, housing areas, etc. Although these areas are small in size compared to the other types, they often serve as reservoirs for weedy species. They can also serve as corridors through which alien species spread, which is especially true for roadsides. Additionally, alien species are often specifically planted in these areas, and can even include NEM:BA listed species. The disturbed areas in the study area were characterised by a wide range of vegetation cover, topography, aspect, and soil types.

A total of 198 plant species were found within the study area, which consisted of 158 native, 0 Red List, 6 protected, 0 Mpumalanga endemic, 39 alien, and 11 NEM:BA listed invasive species. Furthermore, a total of 61 species were recorded within the study area that were not recorded within POSA, 6 of which were SoCC (*Boophone disticha*, *Crinum bulbispermum*, *Haemanthus humilis* subsp. *hirsutus*, *Aloe ecklonis*, *Gladiolus ecklonii*, and *Gladiolus woodii*), as well as 24 alien species. A summary of species according to the various classifications is given by Table 14 of the ecology specialist report (**Appendix D**).

iii. Ecosystem Threat Status of the Broad-Scale Vegetation Types

On the basis of a scientific approach used at national level by the South African National Biodiversity Institute (SANBI), vegetation types can be categorised according to their conservation status which is, in turn, assessed according to the degree of transformation relative to the expected extent of each vegetation type. The status of a habitat or vegetation type is based on how much of its original area still remains intact relative to various thresholds. On a national scale the thresholds are as depicted in **Table 7.9** below, as determined by best available scientific approaches. The level at which an ecosystem becomes Critically Endangered differs from one ecosystem to another and varies from 16% to 36%.

Table 7.9: Conservation status of different vegetation types occurring within the project site and broader study area

Vegetation Type	Target (%)	Transformed (%)	Conserved (Statutorily & other reserves)	Conservation Status	
				National Vegetation Map (SANBI, 2018)	National Ecosystem List (NEMA:BA, 2011)
Soweto Highveld Grassland	24%	47.3%	0.2%	Vulnerable	Vulnerable
Amersfoort Highveld Clay Grassland	27%	24.5%	0%	Least Threatened	Not Listed
Eastern Highveld Grassland	24%	44%	0.3%	Vulnerable	Vulnerable

Determining ecosystem status (Driver et al., 2005). *BT = biodiversity target (the minimum conservation requirement).

Habitat remaining (%)	80–100	least threatened	LT
	60–80	vulnerable	VU
	*BT–60	endangered	EN
	0–*BT	critically endangered	CR

According to scientific literature (Driver *et al.*, 2005; Mucina *et al.*, 2006), and as shown in **Table 7.9**, Soweto Highveld Grassland and Eastern Highveld Grassland are both listed as Vulnerable, and Amersfoort Highveld Clay Grassland is listed as Least Threatened.

The National List of Ecosystems that are Threatened and in need of protection (GN1002 of 2011), published under the National Environmental Management: Biodiversity Act (Act No. 10, 2004), lists national vegetation types that are afforded protection on the basis of rates of transformation. The thresholds for listing in this legislation are higher than in the scientific literature, which means there are fewer ecosystems listed in the National Ecosystem List versus in scientific literature.

According to the National Ecosystem List, Soweto Highveld Grassland and Eastern Highveld Grassland are listed as Vulnerable and Amersfoort Highveld Clay Grassland is not listed in the National List of Ecosystems that are Threatened and in need of protection (GN1002 of 2011).

iv. Listed Plant Species and Plants Protected in terms of the National Environmental Management: Biodiversity Act and the Mpumalanga Nature Conservation Act

A species list was obtained from the SANBI database (POSA) for the study area and surrounding environment. According to this list a total of 102 plant Species of Conservation Concern occur within the area. This included 19 Red List and 88 protected species. Together with this, the online screening report revealed the occurrence of additional Species of Conservation Concern, namely *Miraglossum davyi*, *Aspidoglossum xanthosphaerum*, and *Pachycarpus suaveolens*, as well as three sensitive species (1252, 691, 851; these species will not be made public in order to protect them from illegal activities).

Ground truthing confirmed 6 Species of Conservation Concern to be present within the study area (**Table 7.10**). These were exclusively protected species, and none of them are Red List species. All of these species were present in the list obtained online (POSA) during the desktop phase.

Table 7.10: Plant Species of Conservation Concern recorded within the study area. "MNCA" = Mpumalanga Nature Conservation Act

Family	Species	Conservation Status	
		IUCN Red List	MNCA Schedule
Asphodelaceae	<i>Aloe ecklonis</i>	LC	11
Amaryllidaceae	<i>Boophone disticha</i>	LC	11
Amaryllidaceae	<i>Crinum bulbispermum</i>	LC	11
Iridaceae	<i>Gladiolus ecklonii</i>	LC	11
Iridaceae	<i>Gladiolus woodii</i>	LC	11
Amaryllidaceae	<i>Haemanthus humilis</i> subsp. <i>hirsutus</i>	LC	11

v. Trees Protected in Terms of the National Forests Act

No trees protected under the National Forests Act (No. 84 of 1998) are expected to occur within the project site.

vi. Alien Plant Species

A total of 40 alien plant species were found within the study area, 11 of which were NEM:BA listed invasive species (refer to Appendix D). All of the land types that were inspected contained alien species; however, the number of alien species varied across the types, and these alien species were never dominant to any degree. In other words, none of the types were dominated by alien species. Only some of the recently abandoned agricultural lands were dominated by *Cosmos bipinnatus*. However, these areas are likely very recently abandoned, and do not resemble the description of fallow land.

vii. Critical Biodiversity Areas

The Mpumalanga Biodiversity Conservation Plan (MBCP) is a plan developed conjointly by the Mpumalanga Tourism and Parks Agency (MPTA) and Department of Agriculture and Land Administration (DALA) to guide conservation and land-use decisions in the province in order to support sustainable development.

Terrestrial Critical Biodiversity Areas (CBA) have been identified for the entire Mpumalanga Province and are published by SANBI (<http://bgis.sanbi.org/>). This biodiversity assessment identifies CBAs representing biodiversity priority areas that should be maintained in a natural to near-natural state. CBA maps show the most efficient selection and classification of land portions to be safeguarded so that ecosystem functioning is maintained and national biodiversity objectives are met.

According to **Figure 7.8**, the majority of the project site is located within a Critical Biodiversity Area (CBA): Optimal area (41%), whilst 36% of the project site has been modified to some extent, either through cultivation, ploughing (historical and current) or through infrastructure. Only 6% of the project site is regarded as Irreplaceable CBA. Furthermore, 4% of the project site is regarded as potential important corridor areas. These areas are either associated with ridge/hill systems or are areas that are closely associated with extensive freshwater features.

viii. National Protected Areas Expansion Strategy, Protected Areas, and Conservation Areas

Land-based protected area expansion targets include large, intact, and unfragmented areas of high importance for biodiversity representation and ecological persistence, which are suitable for the creation or expansion of large, protected areas. Such areas were identified through a systematic biodiversity planning process undertaken as part of the development of the National Protected Area Expansion Strategy 2008 (NPAES). 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 terrestrial and freshwater ecosystems (FEPA: Freshwater Ecosystem Priority Areas). These areas should not be seen as future boundaries of protected areas, since in many cases only a portion of a particular focus area would be required to meet the protected area targets set in 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.

The site is not located within any NPAES focus areas or any Formal-/Informal Protected Areas. The nearest NPAES focus area is located approximately 41.6km north-west from the nearest focus area (Moist Escarpment Grassland focus area), while the nearest Formal Protected Area is located approximately 88km south of the site (Seekoievlei Nature Reserve), and the nearest Informal Protected Area approximately 16km to the east of the site (Rietvlei Private Nature Reserve).

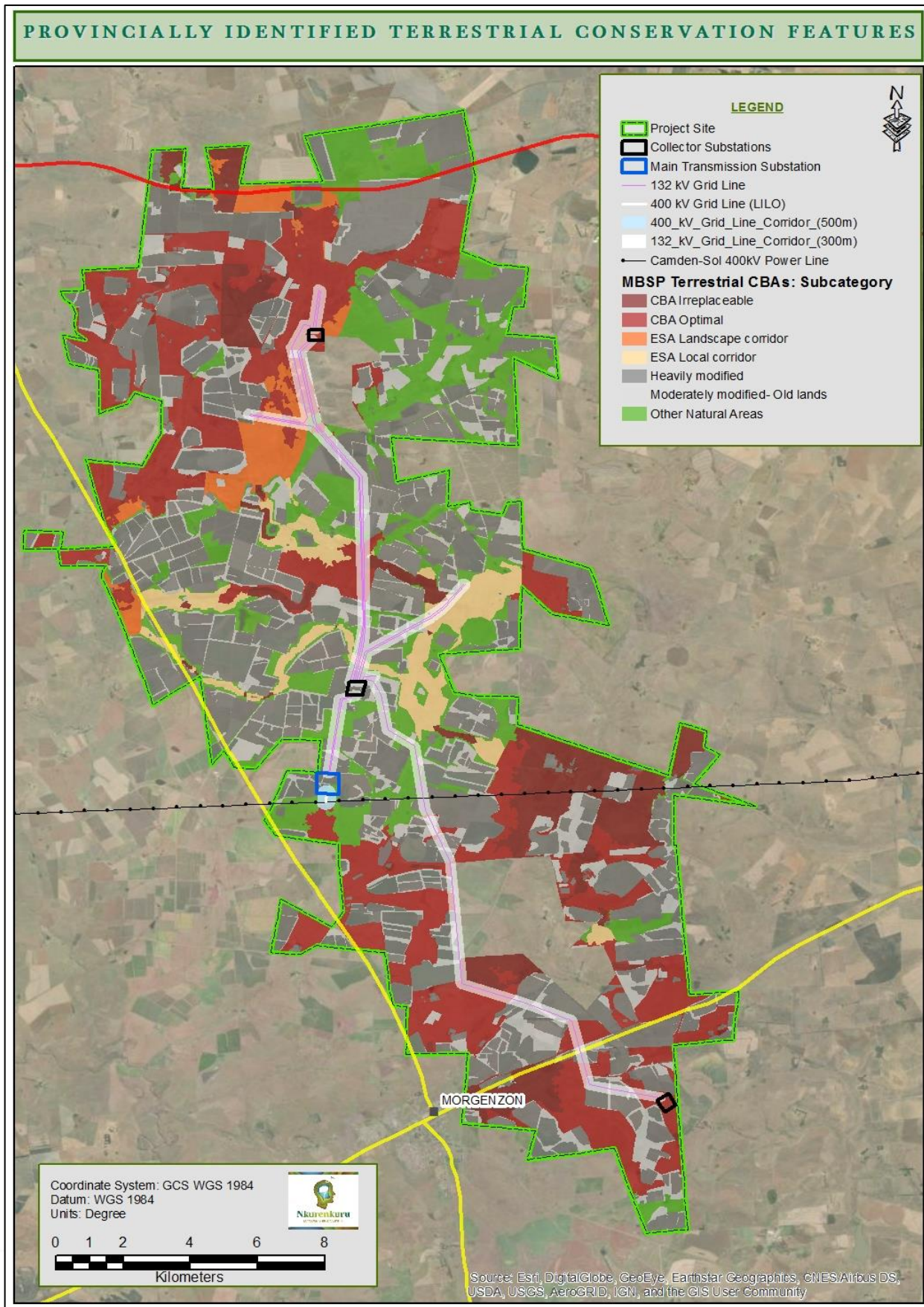


Figure 7.8: Provincially identified terrestrial conservation priority areas found within the greater surroundings of project site

ix. Habitats on Site

A map of the study area, based on observable land features via Google Earth Satellite Imagery, revealed that it consists primarily of five main functional land types, namely: buildings/structures, active farmlands, fallow land (abandoned farmlands), natural grassland areas, and drainage areas (which is comprised of wetlands, small streams, shallow pans and depressions, and natural or artificial dams, among other things) (refer to **Figure 7.9** and **Table 7.11**).

Almost half of the study area consists of natural grasslands (44.5%), while agriculture (38.7%) comprises much of the rest. Natural grasslands have a high sensitivity rating, since the vegetation type indicated for the study area, as per VegMap 2018, is Soweto Highveld Grassland, which is considered to be Endangered.

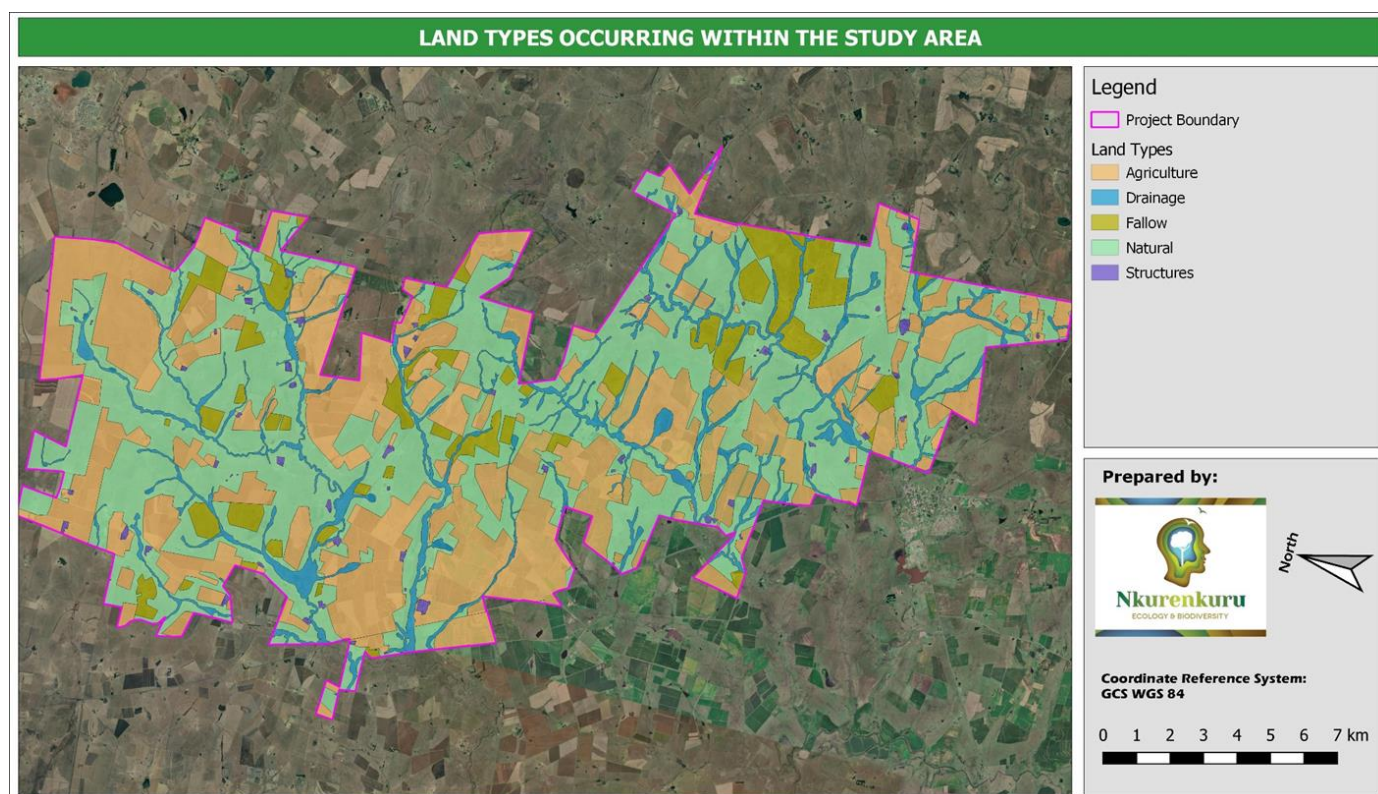


Figure 7.9: Desktop mapping of the land cover/habitat types occurring within the study area. Note that the map has been rotated sideways to optimize space (see the direction of the north arrow)

Table 7.11: Total area sizes (approximately) for land types occurring within the study area, as mapped based on currently available Google Earth Satellite Imagery

Land Type	Sensitivity	Total Area (ha)	Total Area (%)
Agriculture	Low	11 170	38.7
Drainage	Very High	2 442	8.5
Fallow Land	Medium	2 194	7.6
Natural Areas	High	12 841	44.5
Structures	Low	209	0.7
Grand Total		28 856	100.0

x. Strategic Water Source Areas and National Freshwater Ecosystem Priority Areas

The project site is located outside of any Strategic Water Source Areas (SWSA) for groundwater but is located within a SWSA for surface water; namely, the Upper Vaal SWSA.

A review of the National Freshwater Ecosystems Priority Areas (NFEPA) coverage for the project site (refer to **Figure 7.10**) revealed that one FEPA1 priority sub-quaternary catchment covers about 25% of the project site. The river associated with this sub-quaternary catchment is the Osspruit River (FEPA1 Priority River,) which is a fairly short (34km) perennial watercourse, flowing in a largely south-western direction, feeding into the Blesbokspruit River. According to the Department of Water and Sanitation's 1999 Present Ecological State for mainstream rivers, this watercourse was classified as Moderately Modified (Class C).

Furthermore, five Upstream sub-quaternary catchments are located within the project site (covering the remaining 75% of the project site). Most of these sub-quaternary catchments are fairly small to moderate in size, apart from the sub-quaternary catchment covering most of the central portion of the project site. Three of these sub-quaternary catchments are drained by the Kwaggaslaagte River and its associated tributaries, whilst the other two sub-quaternary catchments are drained by the Blesbokspruit River. The Present Ecological State (DWS, 1999) of the Kwaggaslaagte River and its associated tributaries are classified as Moderately Modified (Class C).

A review of the NFEPA coverage for the study area (refer to **Figure 7.10**) revealed that a large amount of wetland features occur within the project site (332 wetland features). Of these wetland features, most (188 features) are classified as Non-FEPA, artificial wetland features, and represent the numerous dams/reservoirs (mainly instream), that characterize the project site. Most of these artificial dam features are fairly small in size (average size of dam features; 0.85 ha). Of the 144 natural wetlands, only 20 wetlands have been listed as FEPA priority wetland features (Nel, et al., 2011). A summary of the natural wetlands, occurring within the project site, as mapped within the NFEPA spatial coverage map, is provided in **Table 7.12** below.

Table 7.12: Summary of NFEPA Wetlands mapped within the project site.

Hydrogeomorphic Unit	Number of Wetlands	Average Size (ha)	Largest Feature (ha)	FEPA Priority Wetlands (amount)	Average Size of FEPA Priority Wetlands (ha)	Largest FEPA Priority Wetland (ha)	WETLAND CONDITION				
							AB: Natural or Good	C: Moderately Modified	Heavily to Critically Modified		
									Z1 ¹¹	Z2 ¹²	Z3 ¹³
Channelled valley-bottom	59	3.4	167	9	0.8	6	11	17	5		26
Unchannelled valley-bottom	14	0.2	0.5	9	0.1	0.3	11	2	1		
Depression	8	2.7	15	1	N/A	1.2	4	3	1		
Flat	8	0.2	1	0	N/A	N/A	2	2			4
Seep	53	5.3	197	1	N/A	61	11	2	1		39

¹¹ Wetlands that overlap with a 1:50,000 "artificial" inland waterbody from the Department of Land Affairs: Chief Directorate of Surveys and Mapping (2005-2007).

¹² Majority of the wetland unit is classified as "artificial" in the wetland delineation GIS layer.

¹³ Percentage natural land cover <25%.

Hydrogeomorphic Unit	Number of Wetlands	Average Size (ha)	Largest Feature (ha)	FEPA Priority Wetlands (amount)	Average Size of FEPA Priority Wetlands (ha)	Largest FEPA Priority Wetland (ha)	WETLAND CONDITION				
							AB: Natural or Good	C: Moderately Modified	Heavily to Critically Modified		
									Z1 ¹¹	Z2 ¹²	Z3 ¹³
Valleyhead Seep	2	0.1	0.2	0	N/A	N/A	1			1	
TOTAL	144	3.6	167	20	3.6	61	40	26	8	0	70

The above table indicates that almost half (48.6%) of all the wetland features have been significantly modified (less than 25% of natural land cover remain). Approximately 27.8% of all wetlands found within the project area can be regarded as largely natural or in a good condition. Of these forty intact wetlands, twenty are regarded as FEPA priority wetlands. Most of these FEPA priority wetlands are fairly small in size (>4 ha), apart from single seepage wetland that is fairly significant in terms of size (61 ha) (refer to **Figure 7.11**). The bulk of the wetlands that occur within the project site are closely associated with the watercourse/river features (channelled valley bottom wetlands, unchanneled valley bottom wetlands and most of the seepages) (refer to **Figure 7.10**).

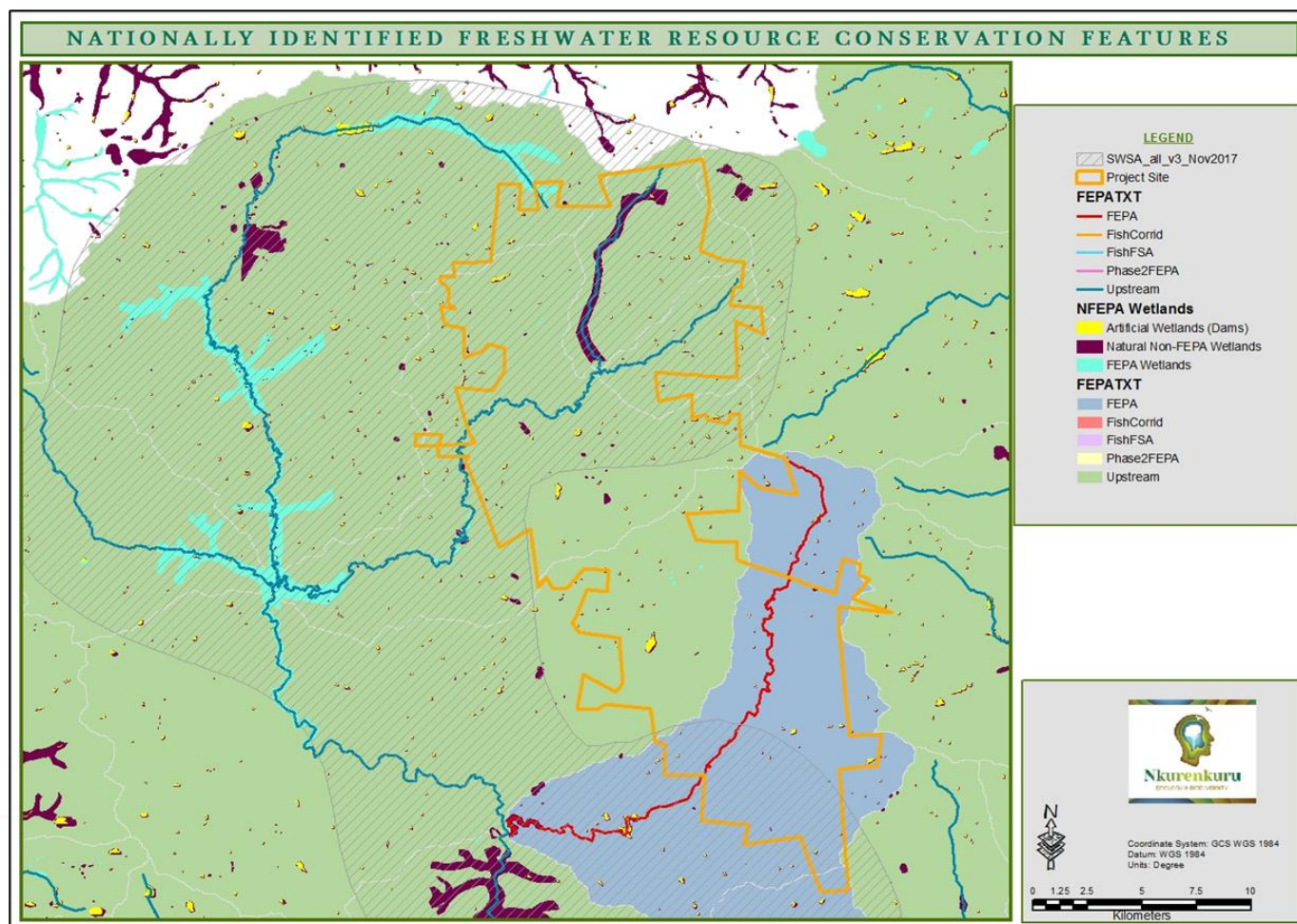


Figure 7.10: Nationally identified aquatic resource conservation priority areas found within the greater surroundings of the proposed project site

xi. Freshwater/Drainage Features

Freshwater/drainage features cover approximately 2 949ha (7.5%) of the project site and are mainly characterised by channelled valley-bottom wetlands, followed by seepage wetlands (**Figure 7.11**). Where the larger watercourses flow across flatter, broader plains, floodplains are typically present. No large depression wetlands are present within the project site, with most of the depression wetlands being small and endorheic.

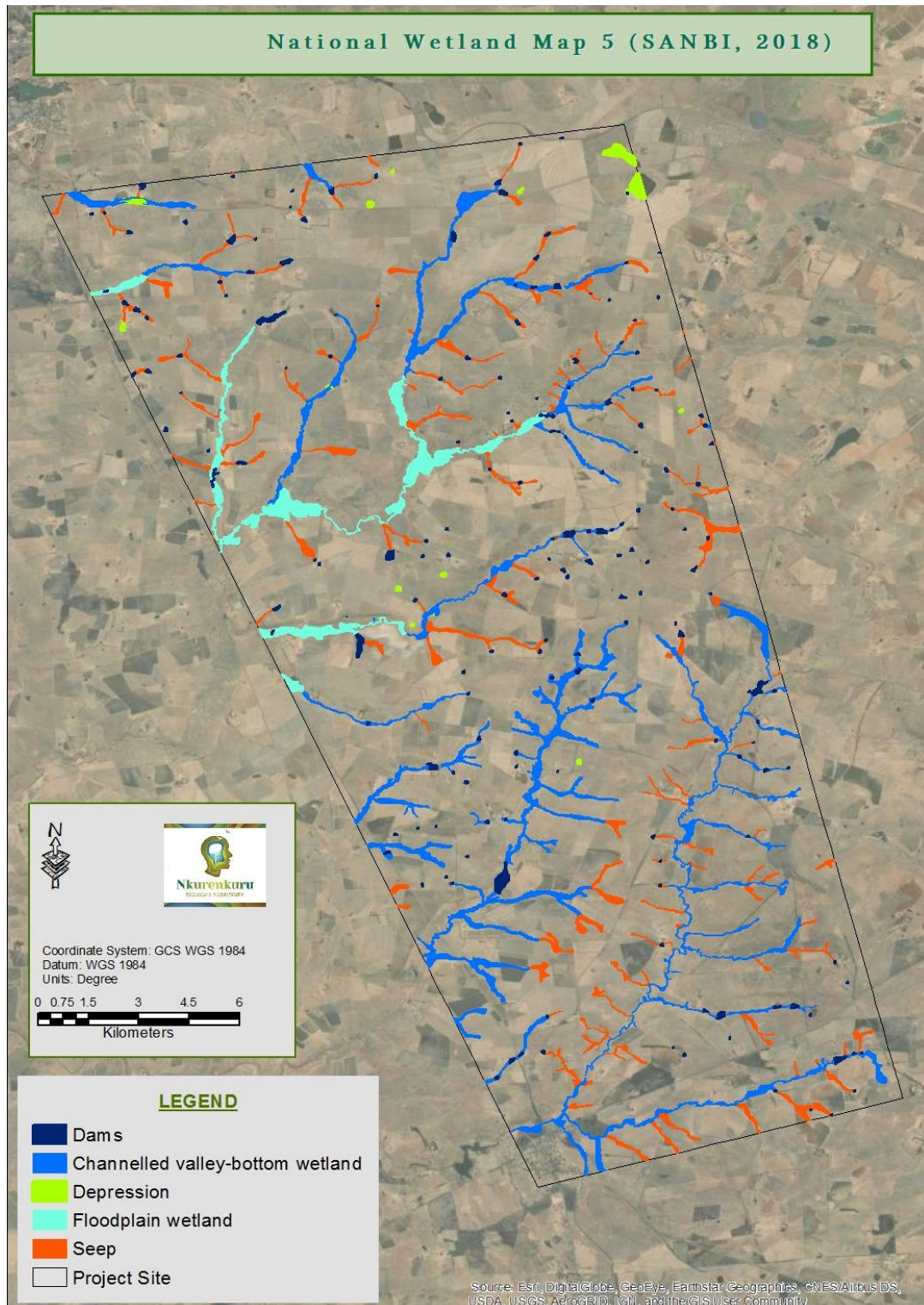


Figure 7.11: Freshwater/wetland features as mapped within SANBI's National Wetland Map 5.

During the field work undertaken for the EIA process, 318 freshwater resource features were identified (Table 8) and delineated within the 500m regulated area and include:

- » Sixty (60) channelled valley-bottom wetlands
- » Thirty-five (35) unchannelled valley-bottom wetlands,
- » Two hundred and nine (209) seepage wetlands;
- » Seven (7) depression Wetlands; and
- » Seven (7) floodplain wetlands

The dominant drainage/wetland features within the project site are the floodplain wetlands, within which almost all of the other wetland features apart from a few endorheic wetland features (7 depression wetlands and 7 seepages), drain into directly. All of the freshwater resource features on and around the site are intermittent or ephemeral, being inundated only for brief periods each year, with periods of drought that are unpredictable in duration.

Artificial wetland features (impoundments/dams) are also a noteworthy hydrological feature within the project site with one-hundred and twenty dam features present within the project site. Most of these dam features are instream impoundments (especially common within the channelled valley-bottom wetlands) and are typically fairly small farm dams which is fairly easily breached or allow some seepage.

xii. Terrestrial Fauna Communities within the Study Area

Mammals

The International Union for Conservation of Nature (IUCN) Red List Spatial Data lists eighty-five (85) mammal species that could be expected to occur within the vicinity of the project site. This is regarded as a moderately-low species diversity. Of these species, sixteen (16) are medium to large conservation dependant species, or species that had a historical range that included the project area, but with natural populations since becoming locally "extinct" in these areas. These species are now generally restricted to protected areas such as game reserves, game farms and protected areas, with most of these species being re-introduced in these areas.

Of the sixty-nine (69) remaining mammals, two (2) are introduced/exotic mammals (House Mouse – *Mus musculus* and Brown Rat – *Rattus norvegicus*). The remaining sixty-seven (67) mammals are regarded as indigenous species that contain or may contain natural populations within the area. Of these naturally occurring mammals, thirty-five (35) species been previously recorded within the larger survey area (Quarter Degree Grids: 2629DA, 2629CB, 2629AD, 2629BC) according to the Animal Demographic Unit (ADU) database, indicating a significant undersupplying within the area.

Of the remaining sixty-seven (67) small- to medium sized mammal species, that have a natural distribution range that include the project site and have a likelihood of occurring within the project site, fourteen (14) are listed as being of conservation concern on a regional or global basis (refer to **Table 7.13**).

Table 7.8: List of mammal species of conservation concern that may occur in the project area as well as their global and regional conservation statuses

Species	Common Name	Conservation Status			Likelihood of Occurrence
		Red Data	IUCN	TOPS	
<i>Redunca fulvorufula</i>	Mountain Reedbuck	NT	LC		Moderate
<i>Panthera pardus</i>	Leopard	NT	NT	Protected	High
<i>Poecilogale albinucha</i>	African Striped Weasel	EN	LC		High
<i>Crocidura mariquensis</i>	Swamp Musk Shrew	LC	VU	VU	Low
<i>Dasymys incomtus</i>	African Marsh Rat	NT	LC		Moderate
<i>Otomys auratus</i>	Southern African Vlei Rat	NT	LC		Moderate
<i>Aonyx capensis</i>	Cape Clawless Otter	NT	LC		Low
<i>Parahyaena brunnea</i>	Brown Hyaena	NT	LC		High
<i>Leptailurus serval</i>	Serval	NT	NT	Protected	High
<i>Ambysomus septentrionalis</i>	Highveld Golden Mole	NT	NT	Protected	Moderate
<i>Crocidura maquassiensis</i>	Maquassie Musk Shrew	NT	NT	Protected	High
<i>Mystromys albicaudatus</i>	White-tailed Mouse	NT	NT		Moderate
<i>Hydrictis maculicollis</i>	Spotted -necked Otter	VU	LC		Moderate
<i>Chrysochloris villosus</i>	Rough-haired Golden Mole	VU	LC		Moderate

Of the identified mammal species that may occur in the project area, twelve (12) are either nationally within TOPS (Threatened and Protected Species Issued in terms of Section 56(1) of the National Environmental Management: Biodiversity Act, 2004) or provincially within Schedule 1 and 2 of the Mpumalanga Nature Conservation Act, No. 10 of 1998 (refer to **Table 7.14**).

Table 7.14: List of Protected mammal species (according to national provincial regulations) that have a distribution that include the project site

Species	Common Name	TOPS (NEM:BA)	CITES	MPNCA Schedule 1	MPNCA Schedule 4	Likelihood of Occurrence
<i>Aonyx capensis</i>	Cape Clawless Otter	Protected	II	2		High
<i>Hydrictis maculicollis</i>	Spotted -necked Otter	Protected	II	2		Moderate
<i>Mellivora capensis</i>	Honey Badger	Protected		2		High
<i>Parahyaena brunnea</i>	Brown Hyaena	Protected		2		Moderate
<i>Orycteropus afer</i>	Aardvark	Protected		2		High
<i>Proteles cristatus</i>	Aardwolf		II	2		High
<i>Redunca fulvorufula</i>	Mountain Reedbuck			2		High
<i>Raphicerus campestris</i>	Steenbok			2		High
<i>Atelerix frontalis</i>	Southern African Hedgehog			2		High
<i>Panthera pardus</i>	Leopard	VU	I		4	Low
<i>Leptailurus serval</i>	Serval	Protected	II			High
<i>Vulpes chama</i>	Cape Fox	Protected				Moderate

Reptiles

The IUCN Red List Spatial Data lists sixty-six (66) reptile species that could be expected to occur within the vicinity of the project site. This is comparatively moderate-low suggesting that reptile diversity at the site is likely to be fairly moderate. Of the sixty-six (66) reptile species, twenty-four (24) have been previously recorded within the larger survey area (Quarter Degree Grids: 2629DA, 2629CB, 2629AD, 2629BC) according to the Animal Demographic Unit (ADU) database, indicating under sampling within the region. Species that has been frequently observed within these QDGs are:

- » Speckled Rock Skink – *Trachylepis punctatissima* (No. of Records: 15)
- » Eastern Thread Snake – *Leptotyphlops scutifrons conjunctus* (No. of Records: 14)
- » Bibron's Blind Snake – *Afrotyphlops bibronii* (No. of Records: 10)
- » Distant's Ground Agama – *Agama aculeata distanti* (No. of Records: 7)
- » Black-headed Centipede-eater – *Aparallactus capensis* (No. of Records: 7)
- » Rhombic Egg-eater – *Dasyplettis scabra* (No. of Records: 7)

Of the sixty-six (66) reptile species that have a natural distribution range that includes the project site and have a likelihood of occurring within the project site, only one is listed as being of conservation concern on a regional or global basis, namely, Coppery Grass Lizard – *Chamaesaura aenea* (Near Threatened and Endemic). This species has a moderate likely hood of occurrence

All of the reptilian species apart from the water leguaan (*Varanus niloticus*), rock leguaan (*Varanus exanthematicus*) as well as all species of snakes (Order *Serpentes*) are regarded as Schedule 2 Protected Species in terms of the Mpumalanga Province Nature Conservation Act No 10 of 1998. Apart from the above mentioned provincially protected species, no TOPS species are likely to occur within the project site.

Amphibians

The IUCN Red List Spatial Data lists nineteen (19) amphibian species that occur within the region. Of these nineteen (19) amphibian species, thirteen (13) species have been previously recorded within the larger survey area (Quarter Degree Grids: 2629DA, 2629CB, 2629AD, 2629BC) according to the Animal Demographic Unit (ADU) database The most frequently recorded species area:

- » Rattling Frog – *Semnodactylus wealii* (No. of Records: 10)
- » Cape River Frog – *Amietia fuscigula* (No. of Records: 8)
- » Common Caco – *Cacosternum boettgeri* (No. of Records: 8)
- » Natal Sand Frog – *Tomopterna natalensis* (No. of Records: 7)
- » Raucous Toad – *Sclerophrys capensis* (No. of Records: 7)

Of the nineteen (19) amphibian species that have a natural distribution range that include the project site, none are listed as being of conservation concern on a regional or global basis. Only one species protected under the Mpumalanga Province Nature Conservation Act No 10 of 1998 has a distribution range that includes the project site, namely African Bull Frog (*Pyxicephalus adspersus*). This species has a Moderate likelihood of occurrence.

xiii. Bats

Bat Species and Important Bat Habitats

Based on current taxonomic information and bat occurrence data, twenty-four (24) species could occur within the project site (refer to **Table 7.15**). The majority have a low likelihood of occurrence and acoustic monitoring has confirmed the presence in the project site of six species.

Table 7.10: Bat Species Potentially Occurring within the project site

Common Name Species Name	Key Habitat Requirements*	Prob. of Occurrence	Conservation Status	
			IUCN†	RSA!
Natal Long-fingered bat <i>Miniopterus natalensis</i>	Temperate or subtropical species. Primarily in savannas and grasslands. Roosts in caves, mines, and road culverts. Clutter-edge forager.	Confirmed (1,828 passes)	LC/U	LC
Cape Serotine <i>Laephotis capensis</i>	Arid semi-desert, montane grassland, forests, savanna and shrubland. Roosts in vegetation and human-made structures. Clutter-edge forager.	Confirmed (65,374 passes)	LC/S	LC
Mauritian tomb bat <i>Taphozous mauritanus</i>	Savanna woodland preferring open habitat. Roosts on rock faces, the outer bark of trees or on the outer walls of buildings under the eaves of roofs. Forages in urban areas and over cultivation. Open-air forager.	High	LC/U	LC
Little Free-tailed bat <i>Chaerephon pumilus</i>	Semi-arid savannah, forested regions, woodland habitats. Roosts in narrow cracks in rock and trees but also in buildings. Open-air forager. Forages in urban areas and over cultivation.	Confirmed (1,188 passes)	LC/U	LC
Midas Free-tailed bat <i>Mops midas</i>	Hot low-lying savanna and woodland. Roosts in narrow cracks in rock and trees but also in buildings. Open-air forager.	Low	LC/D	LC
Egyptian Free-tailed bat <i>Tadarida aegyptiaca</i>	Desert, semi-arid scrub, savanna, grassland, and agricultural land. Roosts in rocky crevices, caves, vegetation, and human-made structures. Open-air forager.	Confirmed (18,184 passes)	LC/U	LC
Wahlberg's Epauletted fruit bat <i>Epomophorus wahlbergi</i>	Roost in dense foliage of large, leafy trees. Associated with forest and forest-edge habitats but will forage in urban environments.	Low	LC/S	LC
African Straw-coloured fruit bat <i>Eidolon helvum</i>	Non-breeding migrant in the PAOI.	Low	NT/D	LC
Egyptian Rousette <i>Rousettus aegyptiacus</i>	Distribution influenced by availability of suitable caves roosts.	Low	LC/S	LC
Temminck's Myotis <i>Myotis tricolor</i>	Montane forests, rainforests, coastal forests, savannah woodlands, arid thicket, and fynbos. Roosts communally in caves (and mines) and closely associated with mountainous terrain. Migratory. Clutter-edge forager.	Low	LC/U	LC

Common Name Species Name	Key Habitat Requirements*	Prob. of Occurrence	Conservation Status	
			IUCN†	RSA!
Welwitsch's Myotis <i>Myotis welwitschii</i>	Mainly open woodland and savannah but also high-altitude grassland, tropical dry forest, montane tropical moist forest, savannah and shrublands. Clutter-edge forager.	Low	LC/U	LC
Yellow-bellied house bat <i>Scotophilus dinganii</i>	Occurs throughout the Savannah Biome but avoids open habitats such as grasslands and Karoo scrub. Roosts in hollow trees and buildings. Clutter-edge forager.	Confirmed (321 passes)	LC/U	LC
Green House bat <i>Scotophilus viridis</i>	Savannah woodland species: restricted to low-lying, hot savannahs and avoids open habitats such as grasslands. Roosts in hollow trees and buildings. Clutter-edge forager.	Low	LC/U	LC
Dusky Pipistrelle <i>Pipistrellus hesperidus</i>	Woody habitats, such as riparian vegetation and forest patches. Recorded roosting in narrow cracks in rocks and under the loose bark of dead trees. Clutter-edge forager.	Low	LC/U	LC
Rusty Pipistrelle <i>Pipistrellus rusticus</i>	Savannah woodland and associated with open water bodies. Roosts in trees and old buildings. Clutter-edge forager.	Low	LC/U	LC
Long-tailed Serotine <i>Eptesicus hottentotus</i>	Montane grasslands, marshland and well-wooded riverbanks, mountainous terrain near water. Roosts in caves, mines, and rocky crevices. Clutter-edge forager.	Confirmed (357 passes)	LC/U	LC
Egyptian Slit-faced bat <i>Nycteris thebaica</i>	Savannah, desert, arid rocky areas, and riparian strips. Gregarious and roosts in caves but also in mine adits, Aardvark holes, rock crevices, road culverts, roofs, and hollow trees. Clutter forager.	Medium	LC/U	LC
Geoffroy's Horseshoe bat <i>Rhinolophus clivosus</i>	Savannah woodland, shrubland, dry, riparian forest, open grasslands, and semi-desert. Roosts in caves, rock crevices, disused mines, hollow baobabs, and buildings. Clutter forager.	Medium	LC/U	LC
Bushveld Horseshoe bat <i>Rhinolophus simulator</i>	Occurs in caves within areas of moist savannah, adjacent to rivers and savannah woodland, montane habitats, and coastal mosaics. Commonly associated with riparian forest and along wooded drainage lines. Roosts in caves and mines. Clutter forager.	Medium	LC/D	LC
Blasius's Horseshoe bat <i>Rhinolophus blasii</i>	Savannah woodlands and are dependent on the availability of daylight roosting sites such as caves, mines, or boulder piles. Clutter forager.	Low	LC/D	NT
Darling's Horseshoe bat <i>Rhinolophus darlingi</i>	Mesic woodland savannahs. Roosts in caves, boulder piles, mines, culverts, large hollow trees and disused buildings. Clutter forager.	Low	LC/U	LC
Sundevall's Leaf-nosed bat <i>Hipposideros caffer</i>	Savannah, bushveld and/or coastal forests, near to rivers and other water sources. Roosts in caves, sinkholes, rock fissures,	Low	LC/D	LC

Common Name Species Name	Key Habitat Requirements*	Prob. of Occurrence	Conservation Status	
			IUCN†	RSA‡
	hollow trees, mines, and culverts. Clutter forager.			
Percival's Short-eared Trident bat <i>Cloeotis percivali</i>	Savannah and woodland areas. Roosts in caves and mine tunnels. Clutter forager.	Low	LC/U	EN
Botswana Long-eared bat <i>Laephotis botswanae</i>	Dry and moist savannah, grassland, and heathland habitats. Often found in the vicinity of rivers or in association with rocky outcrops. No information on roosting sites.	Low	LC/U	LC

Bat roosting sites in the project site are relatively limited and unlikely to support large congregations of bats, with no underground sites (e.g., caves, mines, sinkholes) present. The closest known major bat roost is approximately 75km north of the project site. Although occasional ridges and rocky outcrops are features of the landscape, none are present in the project site. Bats are likely to roost in buildings associated with farmsteads within and bordering the project site, especially Cape Serotine and Egyptian Free-tailed Bat. The building inspections on site did not reveal any roosting bats but evidence (e.g., fur-oil-stained exit/entry points) suggests that bats are using these features. Trees growing at these farmsteads and elsewhere on site where they form clumps could also provide roosting spaces for bats.

Sensitive features within the project site at which bat foraging activity may be concentrated include farm buildings (and within built up areas for some species) where they would forage for insects attracted to lighting, dams and wetland areas, within and along the edge of woodland/tree patches, and over cultivated areas.

Summary of the Pre-Construction Bat Monitoring

Pre-construction bat monitoring was undertaken over a period of 12 months for the project site. Bat activity was sampled at eight locations. During the pre-construction bat monitoring, a total of 156 931¹⁴ bat passes were recorded across 371 sample nights, 83% of which were attributed to Cape serotine. Thirteen (13) percent of total activity was attributed to Egyptian free-tailed bat. The remaining four species confirmed in the area accounted for 5 % of all activity.

Bat activity varied seasonally, with lowest activity in winter and activity increasing through spring and peaking in summer, although this varied by species. Both Egyptian free-tailed bat and Cape serotine showed bi-modal peaks in activity, with low activity in winter (refer to **Figure 7.13**).

¹⁴ This excludes an additional 25,353 bat passes that were unable to be assigned to any particular species by the Wildlife Acoustics library "Bats of South Africa Version 5.4.0", and were thus classified as No ID. These calls were excluded from all analyses but are reported on here to highlight that they may include call fragments from species not confirmed for the site, and hence, the species list for the Aol may not be complete.

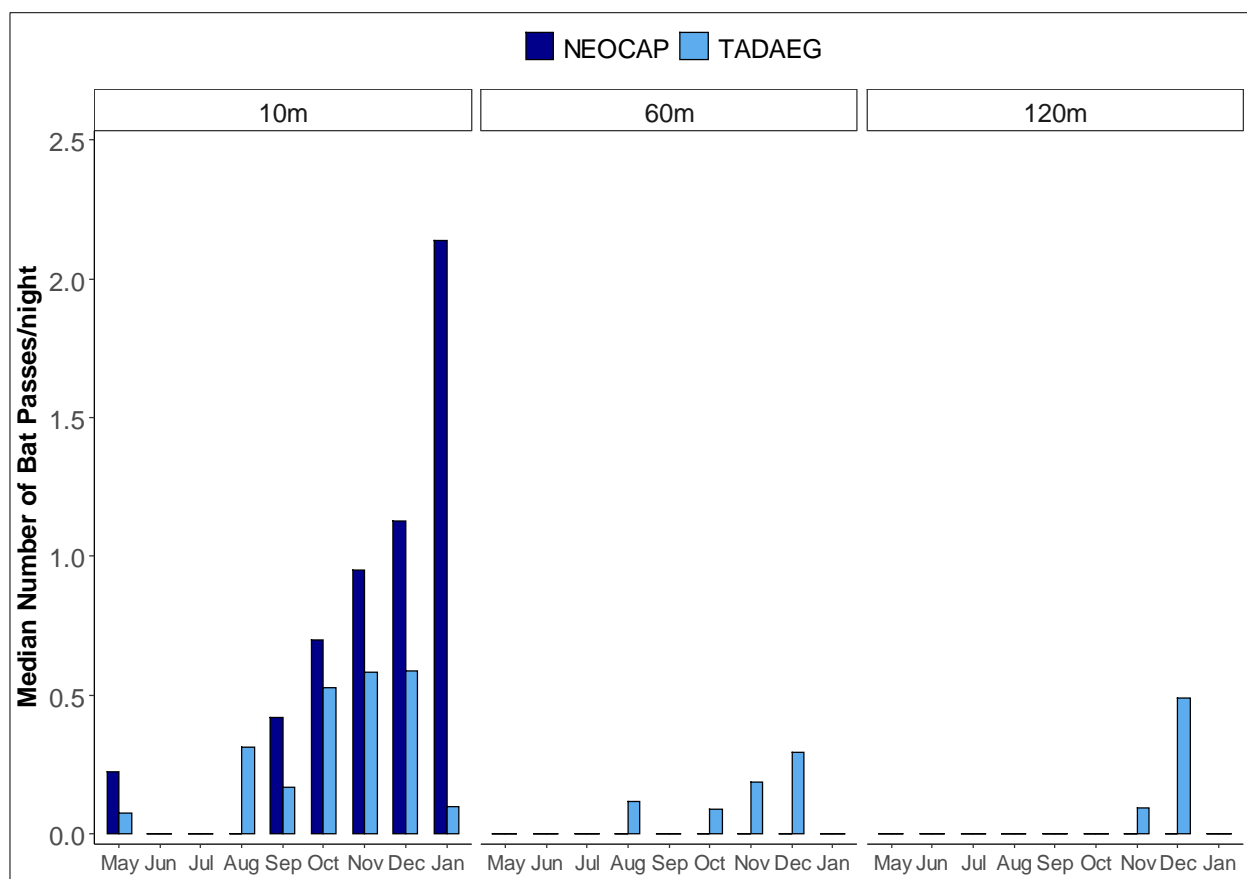


Figure 8.13: Bar chart showing bat passes/night by month for Cape serotine and Egyptian free-tailed bat

xiv. Avifauna

Important Bird and Biodiversity Areas (IBA)

The Amersfoort-Bethal-Carolina (SA018) Important Bird and Biodiversity Area (IBA) is a large IBA bounded by the roads connecting Bethal, Carolina, Ermelo and Amersfoort. The proposed project site is largely located within this IBA. The key species within this IBA is the globally Endangered Botha's Lark. Other globally threatened species include Blue Crane, Southern Bald Ibis, Black Harrier, Blue Korhaan, Black-winged Pratincole, Secretarybird, Martial Eagle and Denham's Bustard. Regionally threatened species include African Grass Owl, White-bellied Korhaan and Lanner Falcon. Range- and biome-restricted species include Kurrichane Thrush and Buff-streaked Chat. The Chrissie Pans (SA019) IBA is a grouping of lakes and pans and situated approximately 45km north-east of the proposed project site. This IBA supports a large population of threatened birds, both wetland and grassland, such as Southern Bald Ibis, Wattled and Blue Crane, Lesser Flamingo and Chestnut-banded Plover.

Avifauna Habitats

A large portion of the proposed project site has been transformed through agricultural practices such as ploughed maize fields as well as cattle and small stock grazing, which occurs throughout. Available avifaunal habitats also include watercourses and drainage lines which cross the site with several wetlands and man-made farm dams under various degrees of existing impact and transformation from farming practices (refer to **Figure 7.14**). Unploughed grassland areas have been considered to be in a natural or near-natural state of function for avifauna even if utilised for low density grazing.

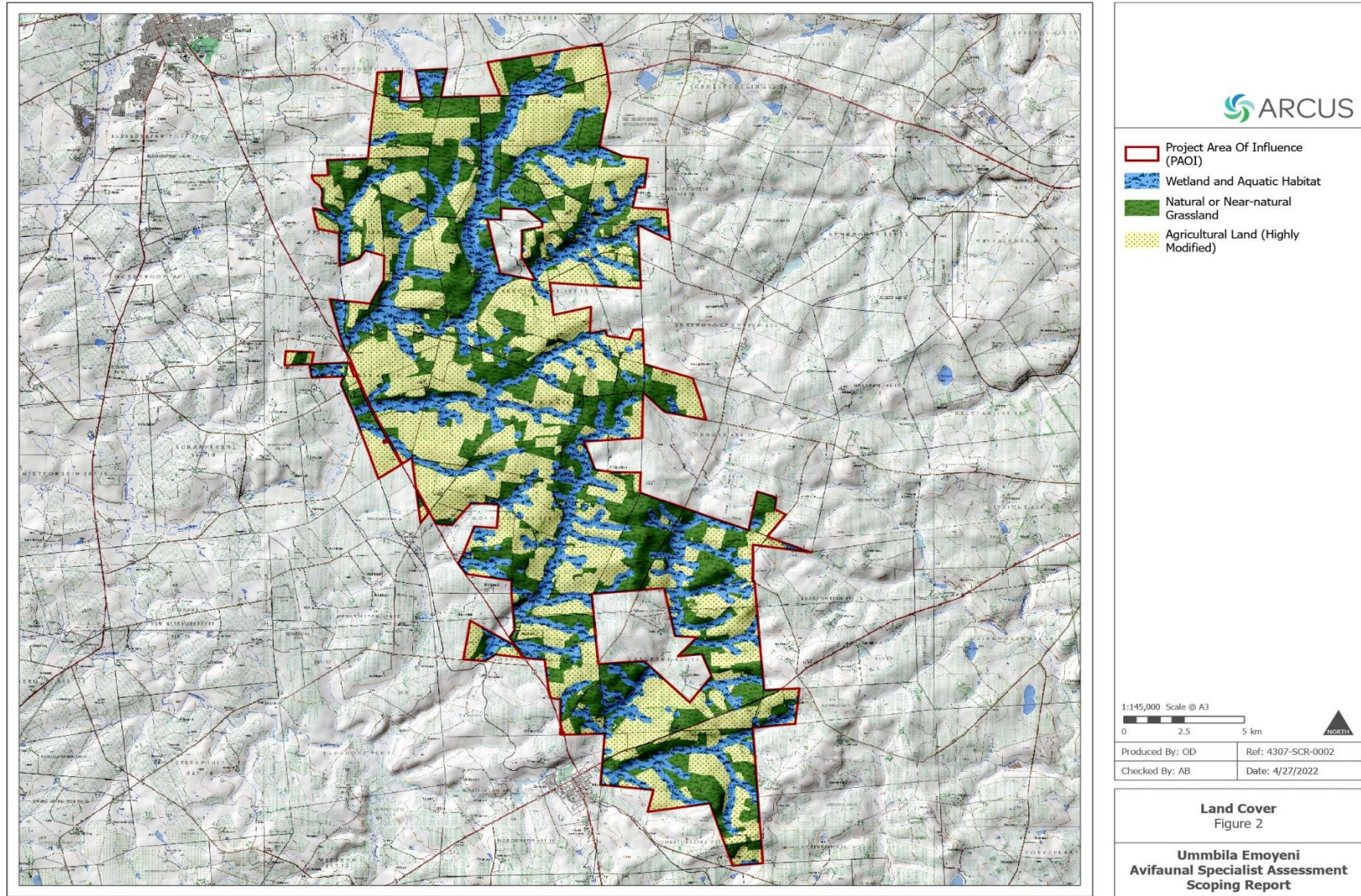


Figure 7.14: Avifauna habitats identified within the project site for the Umbila Emoyeni EGI

Summary of the Pre-Construction Bird Monitoring

Pre-construction bird monitoring was undertaken over a period of 12 months within the project area. The pre-construction bird monitoring included the identification of twelve vantage points across the site as well as two vantage points at a suitable control site (**Figure 7.15**). Vantage points were selected to maximize the viewshed coverage across the site and available habitat types. Five drive transects were located across the site and 15 walk transects of 500m in length were identified to cover different vegetation and habitat types across the site. Transects were conducted twice each per survey.

A total of 26 target species were recorded during vantage point monitoring over the pre-construction monitoring period, during which time 405 flight paths were recorded, comprising 1 502 birds. The majority of flight paths were recorded during the summer monitoring period (213 flights comprising 1007 birds). A total of 93 flights (286 birds), 49 flights (107 birds) and 50 flights (102 birds) were recorded during winter, spring and autumn surveys respectively. This translated into average passage rates ranging from 7.35 birds/hour at VP2, to 0.46 birds/hour at VP5. The maximum passage rate recorded was 24.67 birds/hour at VP2 during summer (**Table 7.16**). The elevated passage rates recorded were due to large flocks of White Stork, Southern Bald Ibis, Black-winged Pratincole and Amur Falcon recorded during the summer months. The highest average passage rate per species was recorded for Southern Bald Ibis at VP1 (3.98 birds/hour) and VP2 (3.52 birds/hour, **Table 7.16**).

A total of 72 observations of 18 target species (comprising 235 birds) were recorded during 703.12km of drive transect observations, with Southern Bald Ibis representing the highest number of records, frequently encountered along DT1 (refer to **Table 7.17**) particularly in the north of the preferred site foraging in a mixture of modified and natural habitat.

A number of Greater Flamingo were observed along DT3 in a larger farm dam with open water. Blue Korhaan records were associated with areas of natural or near-natural vegetation and Secretarybird were recorded on multiple occasions towards the centre of the preferred site. Secretarybird were observed perched in a treeline and while no nest structure was located, this area has been buffered as it appears to be relatively central to the incidental and transect records made for this species in that area.

A total of 102 species (5 805 birds) were recorded during the walk transects conducted across the full pre-construction bird monitoring period. Red-billed Quelea accounted for 711 of these records as they are known to travel in large flocks and utilise agricultural resources. Notably, no Botha's Lark, Rudd's Lark or Yellow-breasted Pipit were recorded in the preferred site.

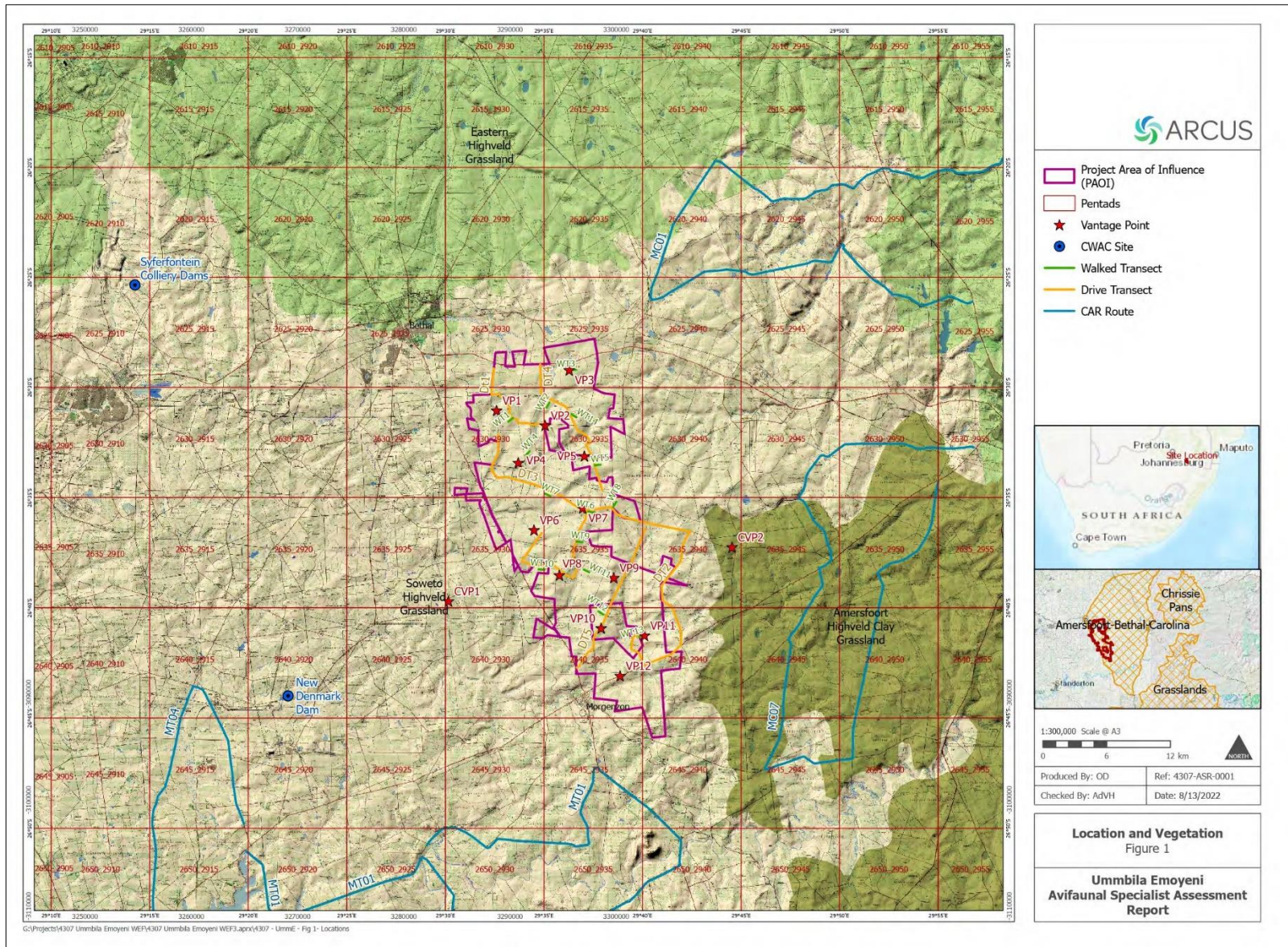


Figure 7.15: Walked and drive transects and vantage point

Table 7.16: Average Passage Rate (birds/hour) recorded per Species during the full Pre-Application Avifaunal Monitoring Period

Species	Vantage Point													
	1	2	3	4	5	6	7	8	9	10	11	12	CVP 1	CVP 2
African Harrier-hawk	-	-	-	0.02	-	-	-	0.02	-	-	0.02	0.02	-	-
Amur Falcon	0.02	1.90	0.04	0.25	-	-	0.04	-	0.46	0.38	0.04	0.19	0.06	-
Black Sparrowhawk	0.02	0.06	-	0.06	-	-	0.04	-	-	-	-	0.02	-	-
Black-chested Snake-eagle	-	-	-	-	-	-	-	-	0.04	-	0.02	-	-	-
Black-winged Kite	0.08	0.48	0.13	0.08	0.29	0.27	0.15	0.21	0.40	0.13	0.21	0.27	0.27	0.18
Black-winged Pratincole	-	-	2.27	-	0.02	-	0.13	-	0.02	-	-	-	-	-
Blue Crane	0.21	0.13	0.06	-	-	-	-	-	0.15	0.04	-	0.04	-	-
Blue Korhaan	-	0.02	-	-	-	-	0.04	-	0.04	-	-	-	-	0.08
Cape Vulture	-	-	-	-	-	-	0.02	-	-	-	-	-	-	-
Common Buzzard	0.02	0.08	0.02	-	0.13	-	0.04	0.13	0.06	0.02	0.02	0.10	0.08	0.05
Greater Kestrel	-	-	0.13	-	-	-	-	-	0.21	-	-	-	0.02	-
Grey-crowned Crane	-	-	0.04	-	-	-	-	-	-	-	-	-	-	-
Grey-winged Francolin	-	0.02	-	-	-	-	-	-	-	-	-	-	-	-
Lanner Falcon	-	-	0.04	0.10	-	0.04	0.02	-	0.17	0.02	-	-	-	-
Marsh Owl	-	0.02	0.10	-	-	0.02	-	-	-	-	-	-	0.02	-
Martial Eagle	-	-	-	0.02	-	-	0.02	0.02	-	-	-	-	-	-
Montagu's Harrier	0.04	-	0.04	0.06	-	-	-	-	0.04	-	-	-	-	-
Northern Black Korhaan	-	0.06	0.04	0.38	-	0.13	0.13	-	-	0.04	-	-	0.08	-
Pallid Harrier	0.04	0.02	-	0.02	-	-	0.02	-	-	-	-	-	-	-
Peregrine Falcon	0.02	-	-	-	-	-	-	-	-	-	-	-	-	-
Rock Kestrel	-	0.02	0.10	-	-	-	-	-	0.04	-	-	-	-	-
Secretarybird	-	0.15	-	0.06	-	0.02	0.02	-	0.02	0.02	0.10	0.04	0.08	0.05
Southern Bald Ibis	3.98	3.52	0.65	-	-	0.13	-	-	-	2.83	1.06	-	0.02	-
Spotted Eagle-owl	0.02	-	-	-	-	-	-	-	-	-	-	-	-	-
White Stork	1.04	0.88	2.85	0.29	-	-	-	0.08	0.08	-	-	-	-	-
Yellow-billed Kite	0.02	-	-	0.02	0.02	-	-	0.02	-	-	-	-	-	-
Total	5.52	7.35	6.52	1.38	0.46	0.60	0.67	0.48	1.73	3.48	1.48	0.69	0.65	0.36

Table 7.17: Species and Number of Individuals Recorded During Drive Transects, Each Conducted Twice Per Survey Across the Full Pre-Application Avifaunal Monitoring Period

Species	DT 1	DT 2	DT 3	DT 4	DT 5	Total
African Fish Eagle	1					1
African Spoonbill	2					2
Amur Falcon			3	2		5
Black Sparrowhawk	2					2
Black-winged Kite	1	10	11	6		28
Blue Crane				2		2
Blue Korhaan	8		2			10
Common Buzzard			5	3		8
Greater Flamingo	4		30			34
Greater Kestrel		1				1
Grey-winged Francolin	13					13
Lanner Falcon				2	1	3
Marsh Owl		2		1		3
Montagu's Harrier				1		1
Rock Kestrel			1	1		2
Secretarybird		3	1	1		5
Southern Bald Ibis	92				21	113
White Stork				2		2
Total	123	16	53	21	22	235

7.5. Integrated Heritage including Archaeology, Palaeontology, and the Cultural Landscape

7.5.1 Archaeology

Fifteen (15) archaeological heritage resources were identified within the study area during the survey of the project site for the grid connection solution. **Table 7.18** provides the description and coordinates of the archaeological heritage finds. **Figure 7.16** provides a locality map of the archaeological heritage resources identified within the project site.

Table 7.18: Archaeological heritage resources identified during the field assessment of the project site

ID	Site Name	Description	Co-ordinates	Grading	Mitigation
1	Umbila Emoyeni 001	10? GRAVES Not all the cairns are intact	- 26.50822222	29.57985	IIIA No direct impact anticipated. Part of historic cluster
2	Umbila Emoyeni 002	STONE STRUCTURE Part of the historical identity of the area, including stone structures and foundations.	- 26.51131389	29.57884167	IIIC No direct impact anticipated. Part of historic cluster
3	Umbila Emoyeni 003	STONE FOUNDATION Part of the historical identity of the area, including stone structures and foundations.	- 26.51185278	29.57861111	NCW Likely to be impacted by the Solar PV Layout
4	Umbila Emoyeni 004	AREA WITH OLD STONE HOUSE STONE CIRCLES STONE KRAAL	- 26.74378611	29.69147222	IIIC Not impacted by the current development layout

ID	Site Name	Description	Co-ordinates		Grading	Mitigation
		Part of the historical identity of the area, including stone structures and foundations.				
5	Umbila Emoyeni 005	41 GRAVES Fieldstone cairns, with a few cement headstones. Headstones are marked, challenging to discern dates. Graves are situated right next to a cornfield, with a wire fence dissecting what may be more graves	-26.7268	29.68093056	IIIA	No direct impact anticipated. However, possibility of more burials in the area
6	Umbila Emoyeni 006	15 GRAVES Fieldstone cairns. No inscriptions that could be read. Graves are situated on top of the koppie, within the wind turbine footprint.	-26.69272778	29.67026111	IIIA	Turbine must be relocated more than 300m east of its present location
7	Umbila Emoyeni 007	OLD STRUCTURES Part of the historical identity of the area, including stone structures and foundations.	-26.51163056	29.64264722	NCW	Not impacted by the current development layout
8	Umbila Emoyeni 008	POSSIBLE GRAVE One stone cairn	-26.50435	29.59498889	IIIA	No direct impact anticipated
9	Umbila Emoyeni 009	HISTORIC YARD MIDDEN Part of the historical identity of the area, including stone structures and foundations.	-26.50869722	29.58020833	IIIC	No direct impact anticipated. Part of historic cluster
10	Umbila Emoyeni 010	HISTORICAL HOUSE AND YARD Part of the historical identity of the area, including stone structures and foundations.	-26.50905278	29.58053611	IIIC	No direct impact anticipated. Part of historic cluster
11	Umbila Emoyeni 011	LARGE STONE KRAAL Part of the historical identity of the area, including stone structures and foundations.	-26.51104444	29.58501667	IIIC	No direct impact anticipated. Part of historic cluster
12	Umbila Emoyeni 012	5 GRAVES Metal cross, fieldstone cairns. Graves are along	-26.54944722	29.56575833	IIIA	No direct impact anticipated

ID	Site Name	Description	Co-ordinates		Grading	Mitigation
		the proposed powerline route				
13	Umbila Emoyeni 013	<p>80 GRAVES</p> <p>Fieldstone cairns and headstones, painted cement frames and headstones, cement and concrete slabs and headstones. Some of the graves have inscriptions; dates indicated as the 1940s and 1950s.</p> <p>Approximately 80 graves within a rectangular packed stone border</p> <p>Graves are along the proposed powerline route</p>	- 26.58522222	29.60138611	IIIA	Road/grid must be realigned to ensure a minimum of a 50m no development buffer is implemented around the site
14	Umbila Emoyeni 014	HISTORICAL PUMP	- 26.58596389	29.60083611	NCW	No direct impact anticipated
15	Umbila Emoyeni 015	<p>SITE SURFACE SCATTERS METAL</p> <p>Surface scatters of glass, large metal objects, farm implements and a cast-iron pot. Could be associated with the graveyard at WP 013 GR</p>	- 26.58672222	29.59949444	IIIC	No direct impact anticipated

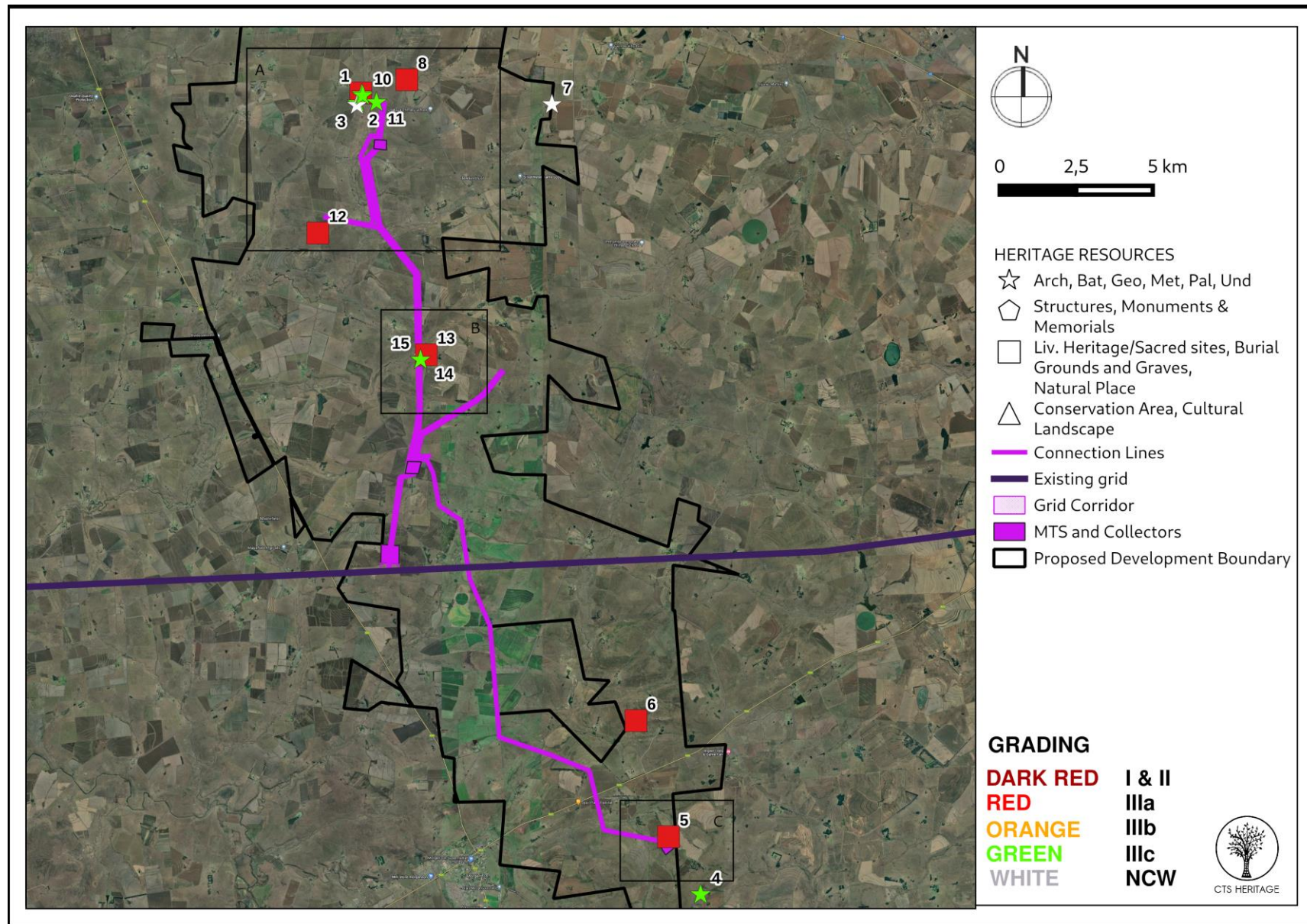


Figure 7.16: Map of archaeological heritage resources identified within the project

7.5.2. Palaeontology

According to the SAHRIS Palaeosensitivity Map (refer to **Figure 7.17**), the area proposed for development is underlain by sediments of zero, moderate and very high palaeontological sensitivity. The palaeontologically sensitive geology of the area is ascribed to the Vryheid Formation of the Ecca Group of sediments. The nature of the excavations associated with Renewable Energy facilities tends to be deep and as such, given the very high palaeontological sensitivity of the sediments that underlay the project site, the likelihood of impacting intact Vryheid Formation sediments is high.



Figure 7.17: Palaeosensitivity map indicating fossil sensitivity underlying the project site

Four (4) palaeontological heritage resources were identified during the survey of the project site. **Table 7.19** provides a description of the palaeontological finds and **Figure 7.18** provides a locality map of the palaeontological heritage resources identified within the project site.

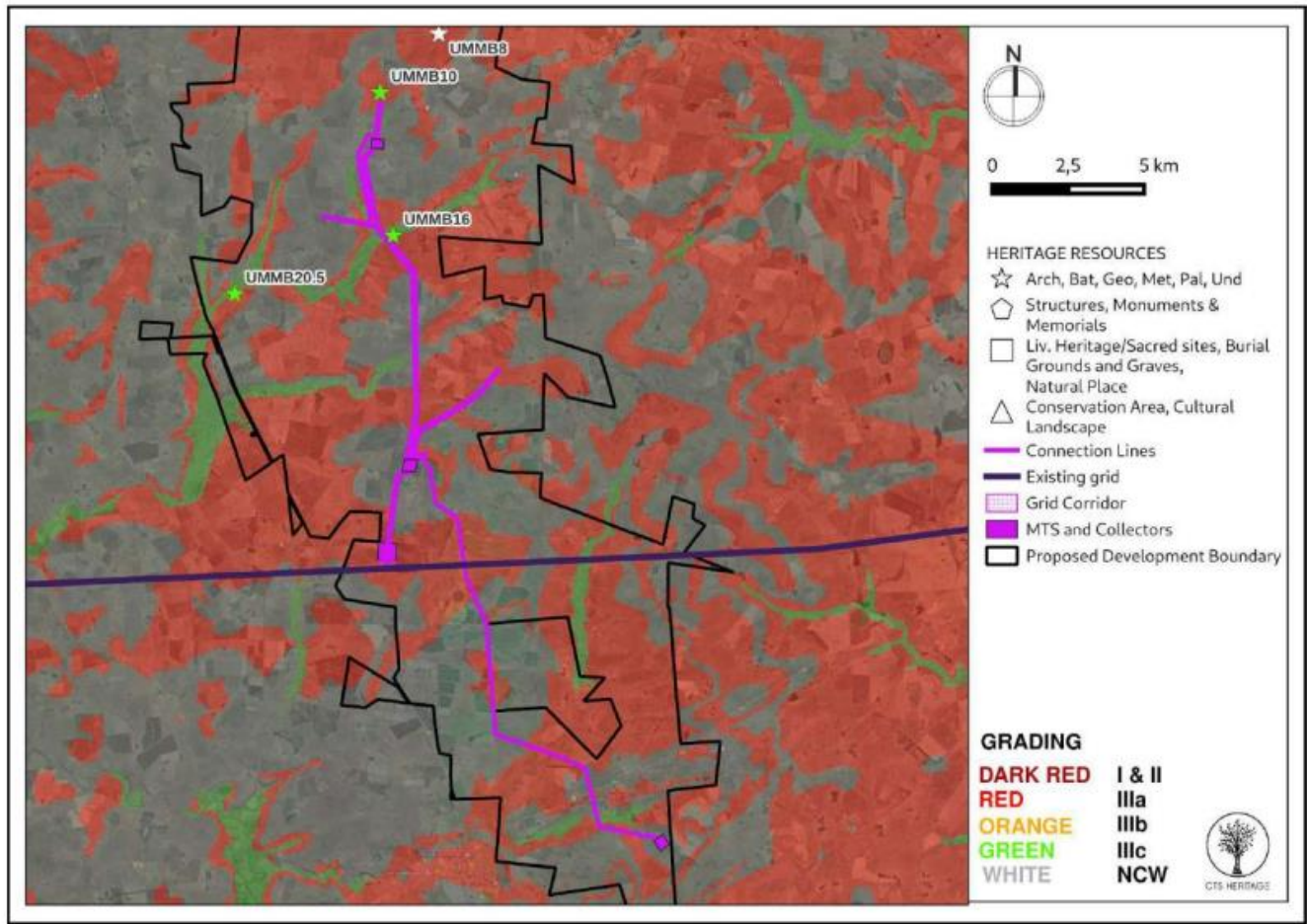


Figure 7.18: Map of palaeontological heritage resources within the proposed project site

Table 7.19: Palaeontological observations made during the field assessment of the project site

ID	Coordinates		Comments	Grade
UMMB8	26.491010° S	29.606630° E	Weathered shale and sandstone exposed during ploughing of very shallow soils on the Vryheid Formation in the northern part of the study area. Excavation for turbine foundations will expose shale and sandstone with a high chance of fossil finds.	NCW
UMMB10	26.508400° S	29.587170° E	Weathered shale and sandstone exposed during ploughing of very shallow soils on the Vryheid Formation in the northern part of the study area. Excavation for turbine foundations will expose shale and sandstone with a high chance of fossil finds.	IIIC
UMMB16	26.550580° S	29.591510° E	Trace fossils, as reported on by Mason and Christie (1985) are abundantly present in the siltstone and shale of the Vryheid Formation.	IIIC
UMMB20.5	26.567758° S	29.539098° E	Soft sediment deformation or possible trace fossil (feeding trail?) in sandstone of the Vryheid Formation.	IIIC

7.5.3. Cultural Landscape

The concept of cultural landscape gives spatial and temporal expression to the processes and products of the interaction between people and the environment. It may thus be conceived as a particular

configuration of topography, geology, vegetation, land use and settlement pattern and associations which establishes some coherence of natural and cultural processes.

Possible receptors within the landscape which could be sensitive to landscape change have been identified and include the towns of Bethal and Morgenzon; the Silver Water and Rievlei Nature Reserves; local farmsteads and homesteads; and the N17, R35, R38, R39 and unsurfaced local roads.

The N17 that runs through the northern section of the development area marks the primary approach from Ermelo (established in the 1870's) to Bethal (established in the 1880's) and as such, the area proposed for development provides a significant gateway between these two historic towns. As with most National Routes, the alignment of the N17 follows the old regional route of the R29 which itself is likely based on historic routes between these significant towns. The way that the local farmsteads and roads interact with each other and elements of the landscape such as topography and river courses etc. all act as contributing elements to the cultural landscape. These elements are mapped in **Figure 7.19**. below.

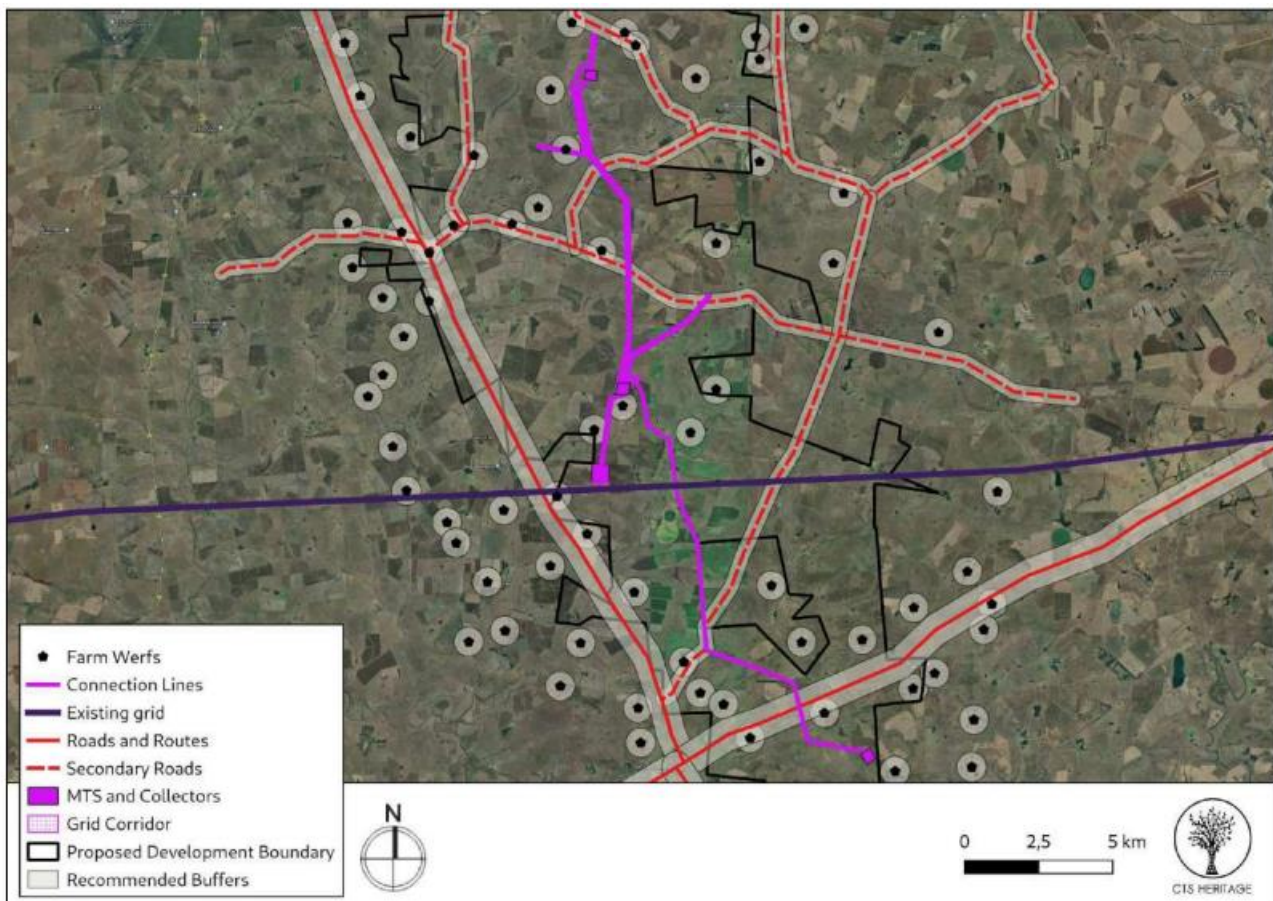


Figure 7.19: Cultural landscape features identified within project site

7.6. Visual Quality

The landscape of the project site and broader area is characterised by three general character types, namely, rural landscape areas, urban landscape areas and industrial landscape areas. The general landform of the project site is undulating and comprises a series of similar size rounded ridgelines that extend approximately 20-30m above broad valley lines.

The landcover within the project site and broader area comprises four main categories, namely natural grassland, arable agriculture, settlements in the form of isolated homesteads, and settlements in the form of towns and villages. Local roads in the area include the N17, R35, R38 and R39, which are busy national/regional distributors that are likely to carry a full range of traffic types, including tourism-related traffic.

Electrical infrastructure is relatively common in the area including low voltage and medium voltage lines in close proximity to roads. Other land cover includes heavy industry, including mining operations and electricity generation. However, these uses are generally located some distance from the proposed focus area. These industrial uses are generally large, isolated, individual industrial operations within the surrounding rural landscape. Major high voltage overhead power lines cross the proposed project site, namely, the Camden Sol 2 400kV power line and the Camden Tutuka 400kV power line.

7.6.1 Identified Visual Receptors

This section is intended to highlight possible receptors within the landscape which due to use could be sensitive to landscape change.

- » Area receptors may include:
 - * The towns of Bethal, Ermelo and Morgenzon.
 - * The Silver Water Reserve.
 - * The Protected Areas of the Rietvlei Nature Reserve, the Ahlers Nature Reserve, the Majuba Nature Reserve and the Langcarel Nature Reserve.
- » Point receptors may include (**Figure 7.20**):
 - * There are a number of Local Farmsteads and Homesteads located both within the focus area and the surrounding landscape.
- » Line receptors may include (**Figure 7.20**):
 - * The N17, the R35, the R38 and the R39 as well as the unsurfaced local roads that that run through the study area. All of these are used mainly by local people with little tourism / recreational importance.



Figure 7.20: Local farmsteads and roads within the project site and broader area

7.7. Socio-Economic Profile

7.7.1. Profile of the Broader Area

The project site is located within Ward 15 of the Govan Mbeki Local Municipality and Ward 12 of the Lekwa Local Municipality, which form part of the Gert Sibande District Municipality.

Population, Income and Employment Profile

The Govan Mbeki Local Municipality accounts for 28% of the population, and 30% of the households in the Gert Sibande District Municipality and Lekwa Local Municipality accounts for 12% of the population as well as households in the district.

Population growth between 2010 and 2020 was 1,9% (Lekwa) and 2,2% (Govan Mbeki) year-on-year for the local municipalities which compared favourably or similar to the district municipality (1,9%) and Mpumalanga (1,6%) over the same period. The high population growth in Govan Mbeki indicates that the municipality offers several opportunities, attracting people towards the area, this can also be motivated by the high population density (121 km²) in comparison to the other areas as well as the higher average monthly household income, which is the highest (R16 755.00) of all the areas in review.

The average household income for the Gert Sibande District Municipality in 2022 is estimated to be R10 851.00. The proposed grid connection infrastructure will also attract additional population to the study area as several employment opportunities will be created through the development, this will ensure a sustainable population growth.

Table 7.20: Overview of the primary study area's population structure (Source: Quantec Standardised Regional (2022))

Indicator	Mpumalanga	Gert Sibande District Municipality	Lekwa Local Municipality	Govan Mbeki Local Municipality
Area (km ²)	76 495	31 840	4 585	2 954
Population	4 821 139	1 290 117	148 706	356 532
Number of Households	1 291 462	338 534	39 993	102 847
Population density (km ²)	63	41	32	121
Average household size	3,8	3,7	3,6	3,6
Annual population growth (2010-2020)	1,6%	1,9%	1,9%	2,2%
Average monthly household income	R10 504	R10 851	R10 797	R16 755

Table 7.21 indicates the number of people employed and not economically active, the percentage of the population unemployed as well as the labour force participation rate for areas in review. The relatively lower unemployment rate and higher labour force participation relative to the district averages further suggests that both the local municipalities are subject to inward migration due to the employment opportunities available within the local municipalities.

Table 7.21: Employment profile of the study area (Source: Quantec Standardised Regional (2022))

Indicator	Mpumalanga	Gert Sibande District Municipality	Lekwa Local Municipality	Govan Mbeki Local Municipality
Employed	1 112 708	302 264	42 973	108 682
Unemployment Rate	31,7%	31,0%	26,5%	28,5%
Not Economically Active	1 420 762	379 585	40 093	89 777
Labour force participation rate	36,5%	37,0%	43,6%	44,9%

Economic Profile

The following subsection outlines the economic profile at a national as well as a provincial, district municipal and local municipal level.

Nationally, South Africa's Gross Domestic Product (GDP) recorded its fourth consecutive quarter growth, expanding with 1,2% in the second quarter of 2021 (April-June), this followed the increase of 1% in the first quarter (January-March). However, despite the gains made over the last four quarters, the economy is 1,4% smaller than what it was before the COVID-19 pandemic (StatsSA, 2021).

The GVA (Gross Value Added) of the Lekwa Local Municipality was R 19 million in 2020 (constant prices), which collectively accounts for just over 10% of the district economy's GVA, and 3% of the Mpumalanga's. The Govan Mbeki Local Municipality had a GVA of R 103 million in 2020, which accounts for 53% of the district's economy, and 17% of the province. The proposed Umbila Emoyeni EGI will contribute further to the economy and ensure sustainability.

The growth in the local municipalities over the last few years was largely due to the strong performance of the agriculture, trade, finance business services sectors. Manufacturing indicated a contraction in the last 10-years in the district and local municipalities, but remains a large contributor in the economy. Many of these are linked to and service the large mining and manufacturing-based sectors that is present in the town of Secunda. Electricity is an average size industry in the municipalities, any new development would likely greatly increase the contribution of the utilities and construction sectors to the GVA.

Over the last ten years, the Compound Average Growth Rate (CAGR) of Lekwa Municipality contracted with 0,32%, whereas Govan Mbeki Local Municipality contracted with 0,16%. The sectors responsible for the contraction of the overall GVA a growth over the 10-year period in Lekwa Local Municipality was mining, manufacturing, utilities and construction. The mining, manufacturing and construction sectors were responsible for the overall contraction of the Govan Mbeki Local Municipality. It is a good indication that the utilities sector indicates a growth of 1,14% in the Govan Mbeki Local Municipality, the proposed Umbila Emoyeni EGI will further increase this sector's performance.

The trade sector employs the most with a 24,5% and 21,7% and 18,1% contribution in 2020 in the Lekwa and Govan Mbeki Local Municipality, respectively. The utilities sector employs the least to employment in both municipalities, the proposed Umbila Emoyeni EGI will increase the number of employees in this sector. The local agricultural sector includes limited subsistence (informal) farming, unlike other areas in Mpumalanga, where this practice is more dominant. The presence of this subsistence agricultural activity means that the number of households that are dependent on agricultural activities for income could be slightly greater.

In general, agricultural activities are relatively labour intensive, thus a small decline in the size of the sector would generally lead to greater job losses than for example in manufacturing or utilities, which tend to be more capital intensive in nature. The agricultural sector is also frequently one of the largest employers in rural areas and it is for these two reasons that the sector is generally prioritised in development strategies.

7.7.2. Profile of the Immediate Affected Area

The project site is covered by natural grassland which is interspersed with areas of cultivation. Main crop types cultivated in the study area are include sunflower seed, sorghum, rye and potatoes. The project site is characterised by isolated homesteads that are generally related to agricultural uses. There is a tourism related establishment (Silver Water Game Lode) located within the north-eastern section of the proposed site, which appears to be focussed around a dam.

Settlement in the form of towns and villages is limited within the broader project site. The closest settlements include Morgenzon, which is a small town on the R39 less than 1km to the wets of the proposed project site; Bethal, which is also a small town located on the N17 and approximately 6.2km north-west of the proposed project site; and Ermelo, which is located approximately 32km to the east of the proposed projects site. Ermelo is the district centre of the Gert Sibande District Municipality.

Local roads in the area include the N17, R35, R38 and R39, which are busy national / regional distributors that are likely to carry a full range of traffic types, including tourism related traffic. Electrical infrastructure is relatively common in the area, including low voltage and medium voltage lines in close proximity to roads. Other land cover within the broader project site includes heavy industry, including mining operations and electricity generation. However, these uses are generally located some distance from the proposed project site. These industrial uses are generally large, isolated, individual industrial operations within the surrounding rural landscape.

CHAPTER 8: ASSESSMENT OF IMPACTS

This chapter serves to assess the significance of the positive and negative environmental impacts (direct and indirect) expected to be associated with the development of the Umbila Emoyeni EGI. This assessment has considered the construction of grid connection infrastructure.

The grid connection infrastructure will include:

- » A new 400/132 kV Main Transmission Substation (MTS), to be located adjacent to the Camden SOL Overhead Lines (OHLs).
- » New collector stations: each will comprise several incoming 132 kV feeder bays connecting OHLs from the MTS, a 132kV bus bar and outgoing feeder bays to remote switching stations.
- » Two 400kV loop-in loop-out OHLs to the existing Camden-Sol 400kV transmission line.
- » On-site switching stations (132kV in capacity) at each renewable energy facility.
- » 132kV power lines from the switching stations to the collector substations and ultimately to a new MTS.
- » On-site IPP substations where the generated power will be transformed from 33 kV to 132 kV so it can be evacuated to the switching stations and from there to the Collector station and MTS
- » Access roads up to 8m wide.

The 400/132kV MTS will serve as the main point of connection of the renewable energy cluster (wind and solar) and Eskom Transmission infrastructure. This IPP stations will connect to a collector substation via a 132kV line and will then connect to the MTS. This is generally an Eskom requirement in order to stop access into the MTS being constrained. The connection of the proposed 400/132kV MTS to the national grid will be via a new loop-in loop-out 400kV power line that will connect into the existing Camden-Sol 400kV transmission line.

The full extent of the project site (~27 819ha) was considered through the Scoping Phase of the EIA process by the independent specialists and the EAP. On-site sensitivities were identified through the review of existing information, desktop evaluations and detailed field surveys. The identification of a development footprint for the EGI within the project site was undertaken by the developer through consideration of the sensitive environmental features and areas, and application of a mitigation hierarchy which aimed at avoidance as the first level of mitigation. The specialist assessments undertaken as part of this EIA process have considered the development footprint (refer to **Figure 8.1**) which was provided by the developer.

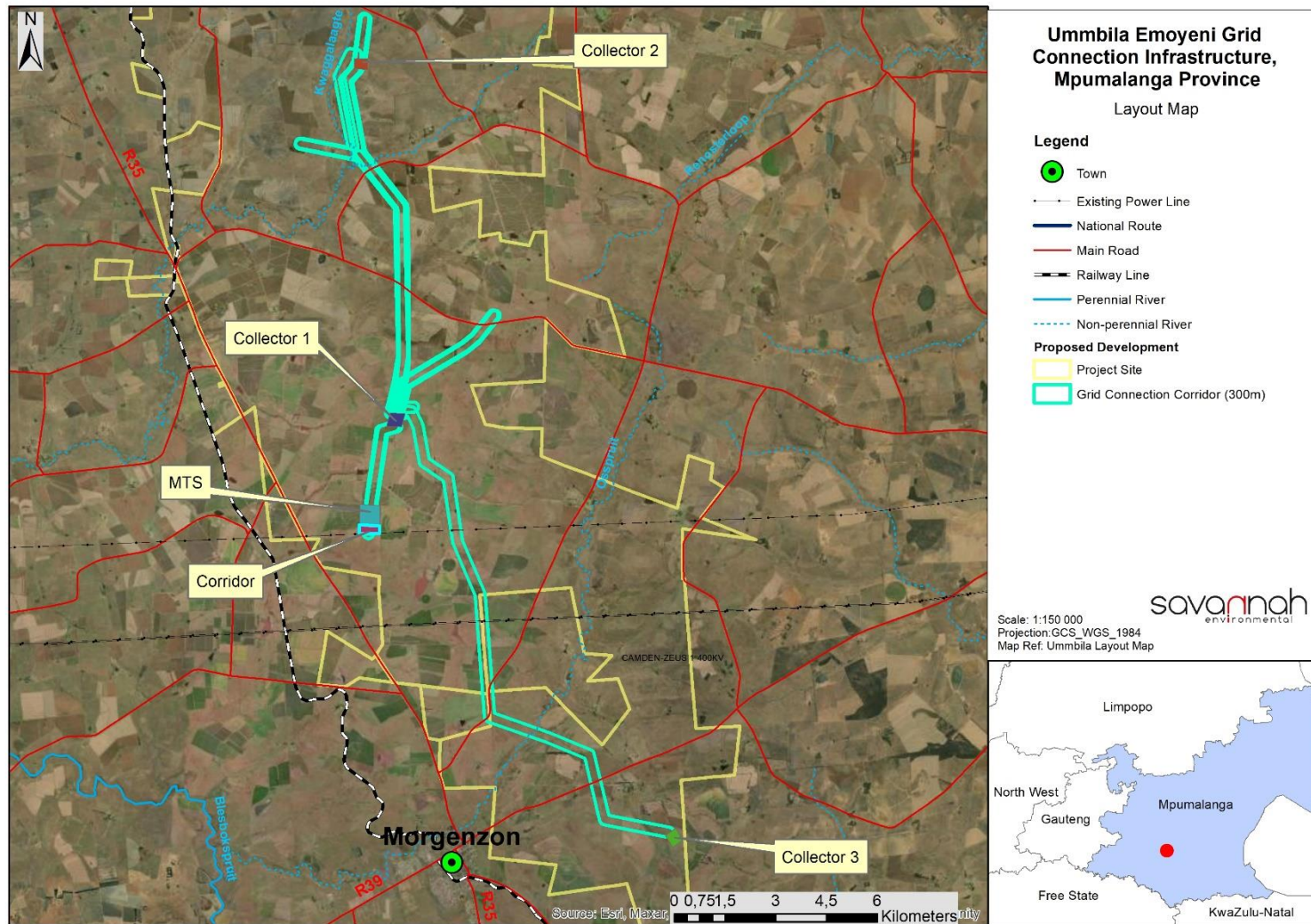


Figure 8.1: Map showing the project site within which the development footprint for the Umbila Emoyeni EGI has been placed and assessed as part of this EIA process (also refer to **Appendix O**).

The sections which follow provide a summary of the specialist input for each field of study in terms of the impacts which are expected to occur, the significance of the impacts, the opportunity for mitigation of the impacts to an acceptable level and the appropriate mitigation measures recommended for the reduction of the impact significance. Note that impacts associated with decommissioning are expected to be similar to those associated with construction activities and therefore in certain instances, these impacts are not considered separately within this chapter. This section of the report must be read together with the detailed specialist studies contained in **Appendix D to L**.

The development of the project will comprise the following phases:

- » *Pre-Construction and Construction* – will include pre-construction surveys; site preparation; establishment of the grid connection infrastructure; construction of foundations involving excavations and cement pouring; the transportation of components/construction equipment to site, manoeuvring and operating cranes for unloading and installation of equipment; laying cabling; and commissioning of new equipment and site rehabilitation.
- » *Operation* – will include the generation of electricity, which will be fed into the national grid via a new 33/132kV onsite collector substation and new 132kV overhead power lines to be connected to a proposed 400/132kV MTS. The operation phase of the Umbila Emoyeni EGI is expected to be approximately 20 - 30 years (with maintenance).
- » *Decommissioning* – depending on the economic viability of the EGI, the length of the operation phase may be extended beyond a 20 - 30 year period. At the end of the project's life, decommissioning will include site preparation, disassembling of the components of the EGI, clearance of the relevant infrastructure at the site and rehabilitation.

8.1. Legal Requirements as per the EIA Regulations, 2014 (as amended), for the undertaking of an Environmental Impact Assessment Report

This chapter of the EIA Report includes the following information required in terms of the EIA Regulations, 2014 - Appendix 3: Scope of Assessment and Content of Environmental Impact Assessment Reports:

Requirement	Relevant Section
3(1)(h)(v) the impacts and risks identified including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts (aa) can be reversed, (bb) may cause irreplaceable loss of resources, and (cc) can be avoided, managed or mitigated.	The impacts and risks associated with the development of the Umbila Emoyeni EGI, including the nature, significance, consequence, extent, duration and probability of the impacts and the degree to which the impact can be reversed and cause an irreplaceable loss of resources are included in sections 8.3.2, 8.4.2, 8.5.2, 8.6.2, 8.7.2, 8.8.2, 8.9.2, 8.10.2, and 8.11.2.
3(1)(h)(vii) positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects.	The positive and negative impacts associated with the development of the Umbila Emoyeni EGI are included in sections 8.3.2, 8.4.2, 8.5.2, 8.6.2, 8.7.2, 8.8.2, 8.9.2, 8.10.2, and 8.11.2.
3(1)(h)(viii) the possible mitigation measures that could be applied and the level of residual risk.	The mitigation measures that can be applied to the impacts associated with the Umbila Emoyeni EGI are included in sections 8.3.2, 8.4.2, 8.5.2, 8.6.2, 8.7.2, 8.8.2, 8.9.2, 8.10.2, and 8.11.2.

Requirement	Relevant Section
<p>3(1)(i) a full description of the process undertaken to identify, assess and rank the impacts the activity and associated structures and infrastructure will impose on the preferred development footprint on the approved site as contemplated in the accepted scoping report through the life of the activity, including (i) a description of all environmental issues and risks that were identified during the environmental impact assessment process and (ii) an assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures.</p>	<p>A description of all environmental impacts identified for the Umbila Emoyeni EGI during the EIA process, and the extent to which the impact significance can be reduced through the implementation of the recommended mitigation measures provided by the specialists are included in sections 8.3.2, 8.4.2, 8.5.2, 8.6.2, 8.7.2, 8.8.2, 8.9.2, 8.10.2, and 8.11.2.</p>
<p>3(1)(j) an assessment of each identified potentially significant impact and risk, including (i) cumulative impacts, (ii) the nature, significance and consequences of the impact and risk, (iii) the extent and duration of the impact and risk, (iv) the probability of the impact and risk occurring, (v) the degree to which the impact and risk can be reversed, (vi) the degree to which the impact and risk may cause irreplaceable loss of resources and, (vii) the degree to which the impact and risk can be avoided, managed or mitigated.</p>	<p>An assessment of each impact associated with the development of the Umbila Emoyeni EGI, including the nature and significance, the extent and duration, the probability, the reversibility, and the potential loss of irreplaceable resources, as well as the degree to which the significance of the impacts can be mitigated are included in sections 8.3.2, 8.4.2, 8.5.2, 8.6.2, 8.7.2, 8.8.2, 8.9.2, 8.10.2, and 8.11.2.</p>
<p>3(1)(m) based on the assessment, and where applicable, recommendations from specialist reports, the recording of proposed impact management outcomes for the development for inclusion in the EMP as well as for inclusion as conditions of authorisation.</p>	<p>Mitigation measures recommended by the various specialists for the reduction of the impact significance are included in sections 8.3.2, 8.4.2, 8.5.2, 8.6.2, 8.7.2, 8.8.2, 8.9.2, 8.10.2, and 8.11.2.</p>

8.2. Quantification of Areas of Disturbance on the Site

Site-specific impacts associated with the construction and operation of the Umbila Emoyeni EGI relate to the direct loss of vegetation and species of special concern, disturbance of animals and loss of habitat and impacts on soils. The Umbila EGI will enable the evacuation of electricity from the proposed renewable energy facilities which are proposed as part of the Umbila Emoyeni Renewable Energy Farm, which will produce electricity for integration into the national electricity grid and/or for use by private off takers. This infrastructure therefore serves as a grid connection solution for the development of the proposed renewable energy facilities.

The development footprint (**Figure 8.1**) will include affected areas, which will comprise of a new 400/132 kV MTS located adjacent to the Camden SOL overhead lines, two 400kV loop-in loop-out OHLs to the existing Camden-Sol 400kV transmission line, new collector substations; on-site switching stations (132kV in capacity) at each renewable energy facility, 132kV overhead power lines, and access roads up to 8m wide. The areas considered within this EIA process include:

Infrastructure	Footprint and dimensions
Onsite substations	<ul style="list-style-type: none"> » Development footprint: 4 collector substations (Eskom switching station) of 5ha each » Capacity: 33kV/132kV
132kV power lines	<ul style="list-style-type: none"> » Servitude width: 18m

Infrastructure	Footprint and dimensions
	<ul style="list-style-type: none"> » Height: up to 40m » Length: ~40km » Corridor width for assessment in EIA: 300m
Main Transmission Substation	<ul style="list-style-type: none"> » Development footprint: 600m x 600m » Capacity: 400/132kV » Height: Up to 30m
Power line connection to national grid	<ul style="list-style-type: none"> » Capacity and circuit: 400kV loop-in loop-out » Servitude: 55m per line (i.e. 110m in total) » Height: Up to 40m » Corridor width for assessment in EIA: 300m
Height of the power line towers (pylons)	40m
Access and internal roads	<p>Access will likely be via the main road between Bethal and Morgenzon. This is the R35, a tarred and provincial road. Existing roads on the affected properties will be used where feasible and practical to provide direct access to the EGI. Where necessary, new access roads (up to 12 wide) will be established to provide access to the Main Transmission Substation (MTS).</p> <p>During construction, a permanent access road along the length of the power line corridor (300m wide) between 4 -6m wide will be established to allow for large crane movement. This track will then be utilised for maintenance during operation.</p>
Temporary infrastructure	Temporary infrastructure, including laydown areas and a concrete batching plant, will be required during the construction phase. All temporary infrastructure will be rehabilitated following the completion of the construction phase, where it is not required for the operation phase.

8.3. Potential Impacts on Terrestrial Ecology (including flora and fauna)

The development of the Umbila Emoyeni EGI is likely to result in a variety of impacts associated largely with the disturbance, loss and transformation of intact vegetation and faunal habitat to hard infrastructure such as substations, power lines, roads, operations buildings etc. Potential impacts and the relative significance of the impacts are summarised below (refer to **Appendix D** for more details).

8.3.1 Results of the Terrestrial Ecology Impact Assessment

Figure 8.2 illustrates the sensitivities identified within the faunal, floral and terrestrial biodiversity assessments in relation to the indicative layout provided by the Applicant and assessed within this EIA. Sensitivities include:

- » Freshwater resources – very high sensitivity (no-go)
- » Primary grassland (CBA: Irreplaceable) – very high sensitivity (no-go)
- » Primary grassland (CBA: Optimal) – high sensitivity
- » Secondary grassland – medium to high sensitivity
- » Primary grassland – medium sensitivity
- » Cultivated areas – Low sensitivity
- » Infrastructure – very low sensitivity

Most of the study area is either of Moderate (799.58 ha; 45%) or Low (620.56 ha; 35%) sensitivity. Drainage areas, which include, but are not limited to, wetlands, temporary seepages, and ephemeral rivers and streams, should be considered as no-go areas for the placement of pylons, storage areas, laydown areas and stockpile areas and development within these areas should be avoided as far as possible, apart from watercourse/wetland access road crossings and the spanning of grid lines. They are all classified as "Very High". However, these drainage systems can be locally regarded as "Moderate Sensitive" where existing crossings/road or impacts are already present.

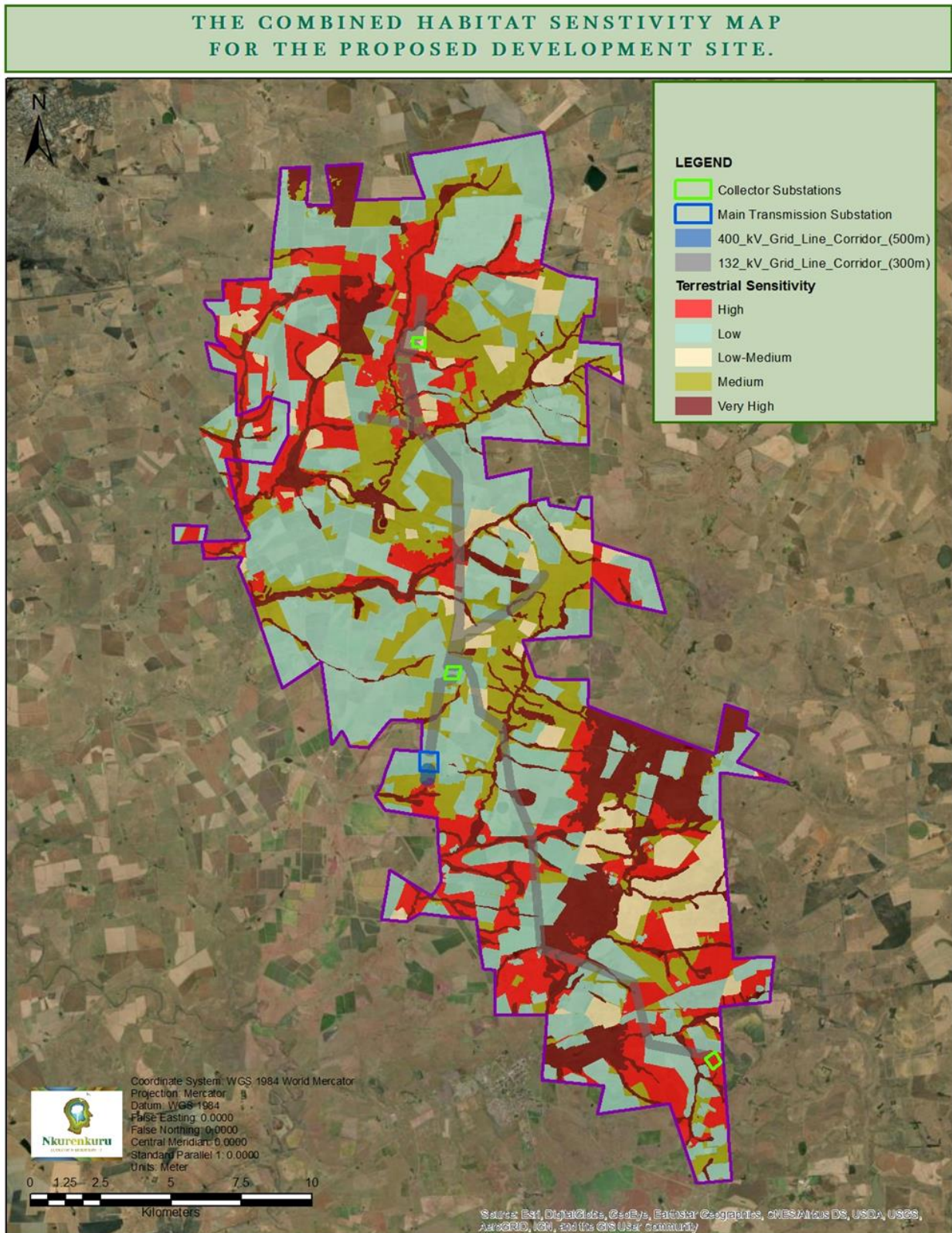


Figure 8.2: Habitat sensitivity map of the project site



Figure 8.3: Terrestrial ecology sensitivity map of the project site

8.3.2 Description of Impacts on Terrestrial Ecology

Potential ecological impacts resulting from the proposed development would stem from a variety of different activities and risk factors associated with the construction and operation phases of the project including the following:

Construction:

- » Human presence and uncontrolled access to the site may result in negative impacts on fauna and flora through poaching of fauna and uncontrolled collection of plants for traditional medicine or other purpose.
- » Site clearing and exploration activities for site establishment.
- » Vegetation clearing could impact listed plant species. Vegetation clearing would also lead to the loss of vegetation communities and habitats for fauna and avifauna and potentially the loss of faunal as well as avifaunal species, habitats, and ecosystems. On a larger and cumulative scale (if numerous and uncontrolled power line developments are allowed to occur in the future) the loss of these vegetation communities and habitats may potentially lead to a change in the conservation status of the affected vegetation type, as well as the ability of this vegetation type and associated features to fulfil its ecological responsibilities (functions). The above impact is most likely to be low due to the fact that most of the development area is situated within an area which has been somewhat degraded due to long term overgrazing.
- » Soil compaction and increased erosion risk would occur due to the loss of plant cover and soil disturbance created during the construction phase. This may potentially impact the downstream watercourses, wetlands, and aquatic habitats, mainly due to an increase of surface water and silt inflow from the surrounding disturbed areas (these potential impacts on downslope wetland features have been assessed within the freshwater resource study and assessment). These potential impacts may result in a reduction in the buffering capacities of the landscape during extreme weather events.
- » Invasion by alien plants may be attributed to excessive disturbance to vegetation, creating a window of opportunity for the establishment of these alien invasive species. In addition, regenerative material of alien invasive species may be introduced to the study area by machinery traversing through areas with such plants or materials that may contain regenerative materials of such species.
- » Presence and operation of construction machinery in the study area. This will create a physical impact as well as generate noise, potential pollution, and other forms of disturbance in the study area.
- » Increased human presence can lead to poaching, illegal plant harvesting, and other forms of disturbance such as fire.

Operation:

- » The EGI will require management and if this is not done effectively, it could impact adjacent intact areas through impacts such as erosion and the invasion of alien plant species.

Decommissioning:

- » During decommissioning, the potential impacts will be very similar to that of the Construction Phase, although with slightly lower significance.

8.3.3 Impact tables summarising the significance of impacts on terrestrial ecology during construction, operation and decommissioning (with and without mitigation)

8.3.3.1. Assessment of Impacts: Proposed Collector and Main Transmission Substations

Construction Phase Impacts

Nature: Potential impacts on vegetation and listed or protected plant species

Vegetation clearing will impact on vegetation and potentially protected plant species.

Impacts on vegetation and protected plant species would occur due to the construction of the substation facilities. This impact is regarded as the most likely and significant impact and will lead to direct loss of vegetation, including protected species.

The most likely consequences include:

- » Local loss of habitat (to an extent as a natural ground covering will be maintained where possible).
- » Very small and local disturbance to processes maintaining local biodiversity and ecosystem goods and services.
- » A potential loss of a few local protected species.

	Without mitigation	With mitigation
Extent	Whole Site (2)	Whole Site (2)
Duration	Permanent (5)	Long-term (4)
Magnitude	Low (4)	Minor (2)
Probability	Highly Probable (4)	Probable (3)
Significance	Medium (44)	Low (24)
Status (positive or negative)	Negative	Negative
Reversibility	Low	Moderate
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Yes, to a large extent	

Mitigation:

- » Preconstruction walk-through of the final development footprint for protected species that would be affected and that can be translocated.
- » Since a large proportion of the identified protected species at the site are succulents and geophytes, the potential for successful translocation is high. Before construction commences individuals of listed species within the development footprint that would be affected, should be counted and marked and translocated where deemed necessary by the ecologist conducting the pre-construction walk-through survey, and according to the recommended ratios. Permits from the relevant provincial authorities, will be required to relocate and/or disturb listed plant species.
- » Any individuals of protected species affected by and observed within the development footprint during construction should be translocated under the supervision of the ECO and/or Contractor's Environmental Officer (EO).
- » Pre-construction environmental induction for all construction staff on site to ensure that basic environmental principles are adhered to. This includes awareness to no littering, appropriate handling of pollution and chemical spills, avoiding fire hazards, minimising wildlife interactions, remaining within demarcated construction areas etc.
- » Demarcate all areas to be cleared with construction tape or similar material where practical. However, caution should be exercised to avoid using material that might entangle fauna.
- » ECO and/or Contractor's EO to provide supervision and oversight of vegetation clearing activities and other activities which may cause damage to the environment, especially at the initiation of the project, when the majority of vegetation clearing is taking place.
- » Ensure that laydown areas, construction camps and other temporary use areas are located in areas of low and medium sensitivity and are properly fenced or demarcated as appropriate and practically possible.
- » All vehicles to remain on demarcated roads and no unnecessary driving in the veld outside these areas should be allowed.
- » Regular dust suppression during construction, if deemed necessary, especially along access roads.

- » No plants may be translocated or otherwise uprooted or disturbed for rehabilitation or other purpose without express permission from the ECO and or Contractor's EO.
- » No fires should be allowed on-site.
- » The proposed footprint for the Collector Substation 3 should be adjusted in order to avoid the seepage wetland (sensitive habitat) and the associated buffer area.

Residual Impacts:

Vegetation loss within areas where hard engineering surfaces will be constructed will take a very long time, post-decommissioning to restore and as such is regarded as a residual impact.

Nature: *Direct Faunal Impacts*

Increased levels of noise, pollution, disturbance, and human presence during construction will be detrimental to fauna. Sensitive and shy fauna would move away from the area during the construction phase as a result of the noise and human activities present, while some slow-moving species would not be able to avoid the construction activities and might be killed. Potential faunal habitats will be lost within the developed areas; however, faunal species will be able to establish themselves within the surrounding grasslands. Subsequently, some impact on fauna is highly likely to occur during construction.

	Without mitigation	With mitigation
Extent	Whole Site (2)	Whole Site (2)
Duration	Long-term (4)	Long-term (4)
Magnitude	Low (4)	Minor (2)
Probability	Highly Probable (4)	Probable (3)
Significance	Medium (40)	Low (24)
Status (positive or negative)	Negative	Negative
Reversibility	Moderate	Moderate
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Noise and disturbance during the construction, decommission and during maintenance phases cannot be avoided but would be transient in nature and with appropriate mitigation; no long-term impacts from the construction phase can be expected.	

Mitigation:

- » Site access should be controlled and no unauthorised persons should be allowed onto the site.
- » Any fauna directly threatened by the associated activities should be removed to a safe location by a suitably qualified person.
- » The collection, hunting or harvesting of any plants or animals at the site should be strictly forbidden. Personnel should not be allowed to wander off the demarcated site.
- » Fires should not be allowed on site.
- » All hazardous materials should be stored in the appropriate manner to prevent contamination of the site. Any accidental chemical, fuel and oil spills that occur at the site should be cleaned up in the appropriate manner as related to the nature of the spill.
- » All construction vehicles on site should adhere to a low speed limit (30km/h) to avoid collisions with susceptible species such as snakes and tortoises.
- » Construction vehicles limited to a minimal footprint on site (no movement outside of the earmarked footprint).

Residual Impacts:

Due to the nature of this development, there will be a permanent loss of habitat and forage for fauna. However, due to the relatively small footprint of the development and the fact that most of the areas has historically been disturbed and also contain a very low faunal diversity this potential residual impact can be regarded as low.

Operation Phase Impacts

Nature: *Soil erosion and associated degradation of ecosystems*

Following construction, there will be a lot of disturbed and loose soil at the site which will render the area vulnerable to erosion. Erosion is one of the greater risk factors associated with the development and it is therefore critically important that proper erosion control structures are built and maintained over the lifespan of the project.

	Without mitigation	With mitigation
Extent	Neighbouring Areas (2)	Local (1)
Duration	Permanent (5)	Very Short Duration (1)
Magnitude	Moderate (6)	Minor (2)
Probability	Highly Probable (4)	Probable (3)
Significance	Medium (60)	Low (15)
Status (positive or negative)	Negative	Negative
Reversibility	Low – if erosion has reached severe levels the impacts will not be remedied easily	High
Irreplaceable loss of resources?	Potential loss of important resources.	No
Can impacts be mitigated?	Yes, to a large extent	

Mitigation:

- » An erosion control management plan should be utilised to prevent erosion.
- » Any erosion problems observed along access roads or any hardened/engineered surface should be rectified immediately and monitored thereafter to ensure that they do not re-occur.
- » All bare areas (excluding agricultural land and the development footprint), affected by the development, should be re-vegetated with locally occurring species, to bind the soil and limit erosion potential where applicable.
- » Re-instate as much of the eroded area to its pre-disturbed, "natural" geometry (no change in elevation and any banks not to be steepened) where possible.
- » Roads and other disturbed areas should be regularly monitored for erosion problems and problem areas should receive follow-up monitoring by the EO to assess the success of the remediation.
- » Topsoil must be removed and stored separately from subsoil. Topsoil must be reapplied where appropriate as soon as possible in order to encourage and facilitate rapid regeneration of the natural vegetation on cleared areas.
- » Practical phased development and vegetation clearing must be practiced so that cleared areas are not left un-vegetated and vulnerable to erosion for extended periods of time.
- » There should be reduced activity at the site after large rainfall events when the soils are wet. No driving off of hardened roads should occur immediately following large rainfall events until soils have dried out and the risk of bogging down has decreased.
- » Any storm-water within the site must be handled in a suitable manner, i.e. trap sediments, and reduce flow velocities
- » Stormwater from the substations and other hard stand areas, must be managed using appropriate channels and swales when located within steep areas.
- » Storm water run-off infrastructure must be maintained to mitigate both the flow and water quality impacts of any storm water leaving the substation sites.
- » Construction of gabions and other stabilisation features to prevent erosion, if deemed necessary.
- » In order to prevent potential erosion and sedimentation impacts on sensitive wetland features, the proposed footprint for the Collector Substation 3 should be adjusted in order to avoid the seepage wetland (sensitive habitat) and the associated buffer area.

Residual Impacts:

The loss of fertile soil and soil capping resulting in areas which cannot fully rehabilitate itself with a good vegetation cover. With appropriate avoidance and mitigation residual impacts will be very low.

Nature: Alien plant invasion

Increased alien plant invasion is one of the greatest risk factors associated with this development following the construction phase. The disturbed and bare ground that is likely to be present at the site during and after construction would leave the site vulnerable to alien plant invasion for some time if not managed. Furthermore, the National Environmental Management Biodiversity Act (Act No. 10 of 2004), as well as the Conservation of Agricultural Resources Act, (Act No. 43 of 1983) requires that listed alien species are controlled in accordance with the Act.

	Without mitigation	With mitigation
Extent	Neighbouring Areas (2)	Local (1)
Duration	Permanent (5)	Very Short Duration (1)
Magnitude	Moderate (6)	Small (2)
Probability	Highly Probable (4)	Probable (3)
Significance	Medium (52)	Low (12)
Status (positive or negative)	Negative	Negative
Reversibility	Moderate	High
Irreplaceable loss of resources?	Potential loss of important resources due to the replacement of natural vegetation by invading alien plants	No
Can impacts be mitigated?	Yes	

Mitigation:

- » The successful reduction in the threat (significance) posed by Alien Invasive Plants relies on a detailed;
 - * Site-specific eradication and management programme for alien invasive plants;
 - * Site-specific Vegetation Rehabilitation Management Plan; and
 - * The meticulous implementation of this Management Plan.
- » Such an Alien Invasive and Vegetation Rehabilitation Management Plan must subsequently be included in the Environmental Management Programme (EMPr).
- » Regular monitoring by the operation and maintenance team for alien plants must occur and could be conducted simultaneously with erosion monitoring.
- » When alien plants are detected, these must be controlled and cleared using the recommended control measures for each species to ensure that the problem is not exacerbated or does not re-occur and increase to problematic levels.
- » Clearing methods must aim to keep disturbance to a minimum.
- » No planting or importing any listed invasive alien plant species (all Category 1a, 1b and 2 invasive species) to the site for landscaping, rehabilitation or any other purpose must be undertaken.

Residual Impacts:

If the above recommended mitigation measures are strictly implemented and some re-establishment and rehabilitation of natural vegetation is allowed the residual impact will be very low.

Decommissioning Phase Impacts

Nature: Direct faunal impacts

Increased levels of noise, pollution, disturbance and human presence during decommissioning will be detrimental to fauna. Sensitive and shy fauna would move away from the area during this phase as a result of the noise and human activities present, while some slow-moving species would not be able to avoid the construction activities and might be killed. Some impact on fauna is highly likely to occur during construction.

	Without mitigation	With mitigation
Extent	Whole Site (2)	Local (1)
Duration	Short Duration (2)	Short Duration (2)
Magnitude	Minor (3)	Small (2)
Probability	Highly Probable (4)	Improbable (2)
Significance	Medium (28)	Low (10)
Status (positive or negative)	Negative	Negative
Reversibility	High	High

Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Noise and disturbance during the decommission and during maintenance phases cannot be avoided but would be transient in nature and with appropriate mitigation; no long-term impacts from the construction phase can be expected.	
Mitigation:		
<ul style="list-style-type: none"> » Site access should be controlled and no unauthorised persons should be allowed onto the site. » Any fauna directly threatened by the associated activities should be removed to a safe location by a suitably qualified person. » The collection, hunting or harvesting of any plants or animals at the site should be strictly forbidden. Personnel should not be allowed to wander off the demarcated site. » Fires should not be allowed on site. » All hazardous materials should be stored in the appropriate manner to prevent contamination of the site. Any accidental chemical, fuel and oil spills that occur at the site should be cleaned up in the appropriate manner as related to the nature of the spill. » All vehicles on site should adhere to a low speed limit (30km/h) to avoid collisions with susceptible species such as snakes and tortoises. » Vehicles limited to a minimal footprint on site (no movement outside of the earmarked footprint). 		
Residual Impacts:		
None.		

Nature: <i>Soil erosion and associated degradation of ecosystems</i>		
Following decommissioning, there will be a lot of disturbed and loose soil at the site which will render the area vulnerable to erosion.		
	Without mitigation	With mitigation
Extent	Neighbouring Areas (2)	Local (1)
Duration	Long Term (4)	Very Short Duration (1)
Magnitude	Moderate (6)	Small (2)
Probability	Highly Probable (4)	Probable (3)
Significance	Medium (48)	Low (12)
Status (positive or negative)	Negative	Negative
Reversibility	Low – if erosion has reached severe levels the impacts will not be remedied easily	High
Irreplaceable loss of resources?	Potential loss of important resources.	No
Can impacts be mitigated?	Yes, to a large extent	
Mitigation:		
<ul style="list-style-type: none"> » Any erosion problems observed should be rectified immediately and monitored thereafter to ensure that they do not re-occur. » There should be regular monitoring for erosion for at least 2 years after decommissioning by the applicant to ensure that no erosion problems develop as a result of the disturbance, and if they do, to immediately implement erosion control measures. » All bare areas, affected by the development, should be re-vegetated with locally occurring species, to bind the soil and limit erosion potential where applicable. » Re-instate as much of the eroded area to its pre-disturbed, "natural" geometry (no change in elevation and any banks not to be steepened) where possible. 		
Residual Impacts:		
None.		

Nature: <i>Alien plant invasion</i>		
Increased alien plant invasion is one of the greatest risk factors associated with this development following the decommissioning phase. The disturbed and bare ground that is likely to be present at the site during and after decommissioning would leave the site vulnerable to alien plant invasion for some time if not managed. Furthermore, the National Environmental Management Biodiversity Act (Act No. 10 of 2004), as well as the Conservation of Agricultural Resources Act, (Act No. 43 of 1983) requires that listed alien species are controlled in accordance with the Act.		
	Without mitigation	With mitigation
Extent	Neighbouring Areas (2)	Local (1)
Duration	Permanent (5)	Very Short Duration (1)
Magnitude	Moderate (6)	Small (2)
Probability	Highly Probable (4)	Probable (3)
Significance	Medium (52)	Low (12)
Status (positive or negative)	Negative	Negative
Reversibility	Moderate	High
Irreplaceable loss of resources?	Potential loss of important resources due to the replacement of natural vegetation by invading alien plants	No
Can impacts be mitigated?	Yes	
Mitigation:		
<ul style="list-style-type: none"> » The successful reduction in the treat (significance) posed by Alien Invasive Plants relies on a detailed; <ul style="list-style-type: none"> * Site-specific eradication and management programme for alien invasive plants; * Site-specific Vegetation Rehabilitation Management Plan; and * The meticulous implementation of this Management Plan. » Such an Alien Invasive and Vegetation Rehabilitation Management Plans must subsequently be included in the Environmental Management Programme (EMPr). » Due to the disturbance at the site alien plant species are likely to be a long-term problem at the site following decommissioning and regular control will need to be implemented until a cover of indigenous species has returned. » When alien plants are detected, these must be controlled and cleared using the recommended control measures for each species to ensure that the problem is not exacerbated or does not re-occur and increase to problematic levels. » Clearing methods must aim to keep disturbance to a minimum. » No planting or importing any listed invasive alien plant species (all Category 1a, 1b and 2 invasive species) to the site for landscaping, rehabilitation or any other purpose must be undertaken. 		
Residual Impacts:		
None.		

8.3.3.2. Assessment of Impacts: Proposed 132 kV and 400kV LILO Grid Lines

Construction Phase Impacts

Nature: <i>Potential impacts on vegetation and listed or protected plant species</i>
Vegetation clearing will lead to the loss of current habitat within the grid connection corridor and is an inevitable consequence of this type of activity. The extent of this grid connection corridor, is however, relatively small. Impacts on vegetation and protected plant species would occur due to the construction of the substation facilities. This impact is regarded as the most likely and significant impact and will lead to direct loss of vegetation, including protected species.
The most likely consequences include:

<ul style="list-style-type: none"> » Local loss of habitat (to an extent as a natural ground covering will be maintained where possible). » Very small and local disturbance to processes maintaining local biodiversity and ecosystem goods and services. » A potential loss of a few local protected species. 		
	Without mitigation	With mitigation
Extent	Development Site (1)	Development Site (1)
Duration	Long Term (4)	Long-term (4)
Magnitude	Low (4)	Minor (2)
Probability	Highly Probable (4)	Probable (3)
Significance	Medium (36)	Low (21)
Status (positive or negative)	Negative	Negative
Reversibility	Low	Moderate
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Yes, to a large extent	
Mitigation:		
<ul style="list-style-type: none"> » Pre-construction walk-through of the power line route/corridor to locate species of conservation concern that can be translocated or avoided. » Vegetation clearing to commence only after walkthrough has been conducted and necessary permits obtained. » Pre-construction environmental induction for all construction staff on site to ensure that basic environmental principles are adhered to. This includes awareness to no littering, appropriate handling of pollution and chemical spills, avoiding fire hazards, minimising wildlife interactions, remaining within demarcated construction areas etc. » Demarcate all areas to be cleared with construction tape or similar material where practical. However, caution should be exercised to avoid using material that might entangle fauna. » ECO and/or Contractor's EO to provide supervision and oversight of vegetation clearing activities and other activities which may cause damage to the environment, especially at the initiation of the project, when the majority of vegetation clearing is taking place. » Vegetation clearing to be kept to a minimum. No unnecessary vegetation to be cleared. » Ensure that laydown areas, construction camps and other temporary use areas are located in areas of low and medium sensitivity and are properly fenced or demarcated as appropriate and practically possible. » All vehicles to remain on demarcated roads and no unnecessary driving in the veld outside these areas should be allowed. » Existing tracks should be used for access wherever possible. » The morphology and hydrology of the wetland features not be altered by unnecessary excavations, dumping of soil or other waste. » No fires should be allowed on-site. » No pylons may be located within wetland/watercourse features as well as their buffer areas. » Disturbance of wetland habitat/flora should be avoided as far as possible and may only be associated with the construction of wetland road crossings, apart from this activity, these features should be regarded as "No-Go" areas. » The construction of new access roads should be restricted to disturbed and transformed areas as far as possible, avoiding the disturbance of natural primary vegetation as far as possible. » Access roads traversing high sensitive habitats should be limited as far as possible, and such roads should either be twin tracks or very narrow ($\leq 4\text{m}$) roads. 		
Residual Impacts:		
Vegetation loss within areas where hard engineering surfaces will be constructed will take a very long time, post-decommissioning to restore and as such is regarded as a residual impact.		

Nature: Direct Faunal Impacts

Increased levels of noise, pollution, disturbance, and human presence during construction will be detrimental to fauna. Sensitive and shy fauna would move away from the area during the construction phase as a result of the noise

and human activities present, while some slow-moving species would not be able to avoid the construction activities and might be killed. Potential faunal habitats will be lost within the developed areas; however, faunal species will be able to establish themselves within the surrounding grasslands. Subsequently, some impact on fauna is highly likely to occur during construction.

	Without mitigation	With mitigation
Extent	Development Site (1)	Development Site (1)
Duration	Long-term (4)	Long-term (2)
Magnitude	Low (4)	Minor (2)
Probability	Probable (3)	Probable (3)
Significance	Low (27)	Low (15)
Status (positive or negative)	Negative	Negative
Reversibility	Moderate	Moderate
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Noise and disturbance during the construction, decommission and during maintenance phases cannot be avoided but would be transient in nature and with appropriate mitigation; no long-term impacts from the construction phase can be expected.	
Mitigation:		
<ul style="list-style-type: none"> » All personnel should undergo environmental induction with regards to fauna and in particular awareness about not harming or collecting species such as snakes, tortoises which are often persecuted out of superstition. » Site access should be controlled and no unauthorised persons should be allowed onto the site. » Any fauna directly threatened by the associated activities should be removed to a safe location by a suitably qualified person. » The collection, hunting or harvesting of any plants or animals at the site should be strictly forbidden. Personnel should not be allowed to wander off the demarcated site. » Fires should not be allowed on site. » All hazardous materials should be stored in the appropriate manner to prevent contamination of the site. Any accidental chemical, fuel and oil spills that occur at the site should be cleaned up in the appropriate manner as related to the nature of the spill. » All construction vehicles on site should adhere to a low speed limit (30km/h) to avoid collisions with susceptible species such as snakes and tortoises. » Construction vehicles limited to a minimal footprint on site (no movement outside of the earmarked footprint). 		
Residual Impacts:		
Due to the nature of this development, there will be a permanent loss of habitat and forage for fauna.		

Operation Phase Impacts

Nature: <i>Soil erosion and associated degradation of ecosystems</i>		
Following construction, there will be a lot of disturbed and loose soil at the site which will render the area vulnerable to erosion. Erosion is one of the greater risk factors associated with the development and it is therefore critically important that proper erosion control structures are built and maintained over the lifespan of the project.		
	Without mitigation	With mitigation
Extent	Neighbouring Areas (2)	Local (1)
Duration	Permanent (5)	Very Short Duration (1)
Magnitude	Small (4)	Minor (2)
Probability	Highly Probable (4)	Probable (3)
Significance	Medium (44)	Low (12)
Status (positive or negative)	Negative	Negative
Reversibility	Low – if erosion has reached severe levels the impacts will not be remedied easily	High

Irreplaceable loss of resources?	Potential loss of important resources.	No
Can impacts be mitigated?	Yes, to a large extent	
Mitigation:		
<ul style="list-style-type: none"> » An erosion control management plan should be utilised to prevent erosion. » Any erosion problems observed along access roads or any hardened/engineered surface should be rectified immediately and monitored thereafter to ensure that they do not re-occur. » All bare areas (excluding agricultural land and the development footprint), affected by the development, should be re-vegetated with locally occurring species, to bind the soil and limit erosion potential where applicable. » Re-instate as much of the eroded area to its pre-disturbed, "natural" geometry (no change in elevation and any banks not to be steepened) where possible. » Roads and other disturbed areas should be regularly monitored for erosion problems and problem areas should receive follow-up monitoring by the EO to assess the success of the remediation. » Topsoil must be removed and stored separately from subsoil. Topsoil must be reapplied where appropriate as soon as possible in order to encourage and facilitate rapid regeneration of the natural vegetation on cleared areas. » Practical phased development and vegetation clearing must be practiced so that cleared areas are not left un-vegetated and vulnerable to erosion for extended periods of time. » There should be reduced activity at the site after large rainfall events when the soils are wet. No driving off of hardened roads should occur immediately following large rainfall events until soils have dried out and the risk of bogging down has decreased. » For the wetland road crossings, the engineering team must provide an effective means to minimise the potential upstream and downstream effects of sedimentation and erosion (erosion protection) as well minimise the loss of wetland vegetation (small footprint). » Silt traps should be used where there is a danger of topsoil or material stockpiles eroding and entering streams and other sensitive areas. » Construction of gabions and other stabilisation features to prevent erosion, if deemed necessary. 		
Residual Impacts:		
The loss of fertile soil and soil capping resulting in areas which cannot fully rehabilitate itself with a good vegetation cover. With appropriate avoidance and mitigation residual impacts will be very low.		

Nature: <i>Alien plant invasion</i>		
Increased alien plant invasion is one of the greatest risk factors associated with this development following the construction phase. The disturbed and bare ground that is likely to be present at the site during and after construction would leave the site vulnerable to alien plant invasion for some time if not managed. Furthermore, the National Environmental Management Biodiversity Act (Act No. 10 of 2004), as well as the Conservation of Agricultural Resources Act, (Act No. 43 of 1983) requires that listed alien species are controlled in accordance with the Act.		
	Without mitigation	With mitigation
Extent	Neighbouring Areas (2)	Local (1)
Duration	Permanent (5)	Very Short Duration (1)
Magnitude	Moderate (6)	Small (2)
Probability	Probable (3)	Probable (3)
Significance	Medium (39)	Low (12)
Status (positive or negative)	Negative	Negative
Reversibility	Moderate	High
Irreplaceable loss of resources?	Potential loss of important resources due to the replacement of natural vegetation by invading alien plants	No
Can impacts be mitigated?	Yes	
Mitigation:		
» The successful reduction in the threat (significance) posed by Alien Invasive Plants relies on a detailed;		

<ul style="list-style-type: none"> * Site-specific eradication and management programme for alien invasive plants; * Site-specific Vegetation Rehabilitation Management Plan; and * The meticulous implementation of this Management Plan. <p>» Such an Alien Invasive and Vegetation Rehabilitation Management Plan must subsequently be included in the Environmental Management Programme (EMPr).</p> <p>» Regular monitoring by the operation and maintenance team for alien plants must occur and could be conducted simultaneously with erosion monitoring.</p> <p>» When alien plants are detected, these must be controlled and cleared using the recommended control measures for each species to ensure that the problem is not exacerbated or does not re-occur and increase to problematic levels.</p> <p>» Clearing methods must aim to keep disturbance to a minimum.</p> <p>» No planting or importing any listed invasive alien plant species (all Category 1a, 1b and 2 invasive species) to the site for landscaping, rehabilitation or any other purpose must be undertaken.</p>
<p>Residual Impacts:</p> <p>If the above recommended mitigation measures are strictly implemented and some re-establishment and rehabilitation of natural vegetation is allowed the residual impact will be very low.</p>

Decommissioning Phase Impacts

<p>Nature: <u>Direct faunal impacts</u></p> <p>Increased levels of noise, pollution, disturbance and human presence during decommissioning will be detrimental to fauna. Sensitive and shy fauna would move away from the area during this phase as a result of the noise and human activities present, while some slow-moving species would not be able to avoid the construction activities and might be killed. Some impact on fauna is highly likely to occur during construction.</p>		
	Without mitigation	With mitigation
Extent	Local (1)	Local (1)
Duration	Short Duration (2)	Short Duration (2)
Magnitude	Minor (3)	Small (2)
Probability	Probable (3)	Improbable (2)
Significance	Low (18)	Low (10)
Status (positive or negative)	Negative	Negative
Reversibility	High	High
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Noise and disturbance during the decommission and during maintenance phases cannot be avoided but would be transient in nature and with appropriate mitigation; no long-term impacts from the construction phase can be expected.	
<p>Mitigation:</p> <p>» Site access should be controlled and no unauthorised persons should be allowed onto the site.</p> <p>» Any fauna directly threatened by the associated activities should be removed to a safe location by a suitably qualified person.</p> <p>» The collection, hunting or harvesting of any plants or animals at the site should be strictly forbidden. Personnel should not be allowed to wander off the demarcated site.</p> <p>» Fires should not be allowed on site.</p> <p>» All hazardous materials should be stored in the appropriate manner to prevent contamination of the site. Any accidental chemical, fuel and oil spills that occur at the site should be cleaned up in the appropriate manner as related to the nature of the spill.</p> <p>» All vehicles on site should adhere to a low speed limit (30km/h) to avoid collisions with susceptible species such as snakes and tortoises.</p> <p>» Vehicles limited to a minimal footprint on site (no movement outside of the earmarked footprint).</p>		
<p>Residual Impacts:</p>		

None.

Nature: *Soil erosion and associated degradation of ecosystems*

Following decommissioning, there will be a lot of disturbed and loose soil at the site which will render the area vulnerable to erosion.

	Without mitigation	With mitigation
Extent	Neighbouring Areas (2)	Local (1)
Duration	Permanent (5)	Very Short Duration (1)
Magnitude	Small (4)	Minor (2)
Probability	Highly Probable (4)	Probable (3)
Significance	Medium (44)	Low (12)
Status (positive or negative)	Negative	Negative
Reversibility	Low – if erosion has reached severe levels the impacts will not be remedied easily	High
Irreplaceable loss of resources?	Potential loss of important resources.	No
Can impacts be mitigated?	Yes, to a large extent	

Mitigation:

- » Any erosion problems observed should be rectified immediately and monitored thereafter to ensure that they do not re-occur.
- » There should be regular monitoring for erosion for at least 2 years after decommissioning by the applicant to ensure that no erosion problems develop as a result of the disturbance, and if they do, to immediately implement erosion control measures.
- » All bare areas, affected by the development, should be re-vegetated with locally occurring species, to bind the soil and limit erosion potential where applicable.
- » Re-instate as much of the eroded area to its pre-disturbed, "natural" geometry (no change in elevation and any banks not to be steepened) where possible.

Residual Impacts:

None.

Nature: *Alien plant invasion*

Increased alien plant invasion is one of the greatest risk factors associated with this development following the decommission phase. The disturbed and bare ground that is likely to be present at the site during and after decommissioning would leave the site vulnerable to alien plant invasion for some time if not managed. Furthermore, the National Environmental Management Biodiversity Act (Act No. 10 of 2004), as well as the Conservation of Agricultural Resources Act, (Act No. 43 of 1983) requires that listed alien species are controlled in accordance with the Act.

	Without mitigation	With mitigation
Extent	Neighbouring Areas (2)	Local (1)
Duration	Permanent (5)	Very Short Duration (1)
Magnitude	Moderate (6)	Small (2)
Probability	Probable (3)	Probable (3)
Significance	Medium (39)	Low (12)
Status (positive or negative)	Negative	Negative
Reversibility	Moderate	High
Irreplaceable loss of resources?	Potential loss of important resources due to the replacement of natural vegetation by invading alien plants	No

Can impacts be mitigated?	Yes
Mitigation:	
<ul style="list-style-type: none"> » The successful reduction in the treat (significance) posed by Alien Invasive Plants relies on a detailed; <ul style="list-style-type: none"> * Site-specific eradication and management programme for alien invasive plants; * Site-specific Vegetation Rehabilitation Management Plan; and * The meticulous implementation of this Management Plan. » Such an Alien Invasive and Vegetation Rehabilitation Management Plans must subsequently be included in the Environmental Management Programme (EMPr). » Due to the disturbance at the site alien plant species are likely to be a long-term problem at the site following decommissioning and regular control will need to be implemented until a cover of indigenous species has returned. » When alien plants are detected, these must be controlled and cleared using the recommended control measures for each species to ensure that the problem is not exacerbated or does not re-occur and increase to problematic levels. » Clearing methods must aim to keep disturbance to a minimum. » No planting or importing any listed invasive alien plant species (all Category 1a, 1b and 2 invasive species) to the site for landscaping, rehabilitation or any other purpose must be undertaken. 	
Residual Impacts:	
None.	

8.3.4 Overall Result

From a botanical and ecological perspective, it was found that the study area is mostly comprised of either Moderate (799.58 ha; 45%) or Low (620.56 ha; 35%) sensitivity. Various "Very High" sensitivity areas also occur throughout the study area (comprising features such as wetlands, ephemeral rivers and streams, seepages, and other drainage lines). Furthermore, various CBA and ESA areas occur throughout the study area. Development is highly discouraged within the areas classified as CBA Irreplaceable Areas and development within CBA Optimal Areas should be avoided as far as possible.

A total of 198 plant species were found within the study area, which consisted of 158 native, 0 Red List, 6 protected, 0 Mpumalanga endemic, 39 alien, and 11 NEM:BA listed invasive species.

A total of 32 mammal, 6 amphibian, and 10 reptile species were recorded within the study area. No amphibian or reptile SCC were recorded within the study area; however, 4 mammal SoCC were recorded, namely: Serval (Near Threatened), Brown hyena (Near Threatened), Vlei rat (Near Threatened), Cape clawless otter (Near Threatened), and South African hedgehog (Near Threatened). It was determined that the development will not detrimentally impact these populations/individual SCC.

During this assessment it was determined that the study area contains numerous habitat variations, and include Drainage, Fallow Land, Natural Clay, Natural Dolerite, Natural Loam Soil, Natural Rock Turf, Natural Sandstone, and Disturbed areas. Each of these areas (excluding disturbed areas) have certain unique species, with drainage areas having the highest number (i.e., many of its species are not shared with the other habitats). Development should therefore not proceed within drainage areas, which are all classified as "Very High" sensitivity. Natural rock turf and natural clay areas had the lowest number of species that occurred only in those types, and development should therefore aim to occur within these habitat types, since this would minimize the loss of unique biodiversity.

Drainage or wetland areas, should be considered as no-go areas for the placement of pylons, storage areas, laydown areas and stockpile areas and development within these areas should be avoided as far as possible, apart from watercourse/wetland access road crossings and the spanning of grid lines. The

developer should aim to incorporate existing watercourse crossings into the final design layout, and as far as possible avoid any new watercourse crossings as far as possible. Based on the current layout, 22 to 24 freshwater resource features will be spanned by the 132 kV gridlines and crossed by access roads. Furthermore, the only substation infrastructure that will directly impact drainage/wetland areas are Collector Substation 3 as a small portion a seepage wetland is located within the footprint of this substation. It is recommended that this substation's footprint is adjusted in order to avoid any direct impacts on this seepage wetlands. All other substation infrastructure will avoid any direct impact on wetland features. Furthermore, no wetland/drainage features are located within the 400 kV LILLO corridor.

There are no impacts associated with the proposed EGI development that cannot be mitigated to a low level. Its local environmental impact can be reduced to an acceptable magnitude. Likewise, the contribution of the proposed EGI to the cumulative impact in the area would be low and is acceptable. As such, there are no fatal flaws associated with the development and no terrestrial ecological considerations that should prevent it from proceeding. Therefore, it is the opinion of the specialists that the development may be authorised within the specified area, subject to the implementation of the recommended mitigation measures.

8.4. Potential Impacts on Freshwater Ecology

The development of the Umbila Emoyeni EGI is likely to result in a variety of impacts from an aquatic perspective. Potential impacts and the relative significance of the impacts are summarised below (refer to **Appendix D** for more details).

8.4.1 Results of the Freshwater Impact Assessment

The dominant drainage/wetland features within the project site are the floodplain wetlands, within which almost all of the other wetland features drain into. All of the freshwater resource features on and around the site are intermittent or ephemeral, being inundated only for brief periods each year, with periods of drought that are unpredictable in duration.

Artificial wetland features (impoundments/dams) are also a noteworthy hydrological feature within the project site with ten dam features present within the development site. Most of these dam features are instream impoundments (especially common within the channelled valley-bottom wetlands) and are typically fairly small farm dams which is fairly easily breached or allow some seepage.

Overall, with the exception of erosion, dams and present road crossings (most prominent impacts), these freshwater systems are still in a fairly natural, to moderate functional condition.

Sensitivities that occur specifically within the project site for the Umbila Emoyeni EGI that may be vulnerable to damage from the proposed project are shown in **Figure 8.3**. All endorheic wetland features, wetland features that are not directly connected to the larger extensive wetland network or that have been fractured/isolated through agricultural practices are classified as High Sensitive. Even though these wetland features do not provide functions and services to the extent of the more connected and larger wetland features, these wetlands still provide some functions and services. Furthermore, most of these wetland features are fairly small and any direct impacts on these wetland habitats may have a significant impact on the drivers of these wetland features as well as the associated biodiversity. Another feature of these wetlands is the fact that, even though small in size, they are located within relatively small catchment areas,

thus these wetlands' percentage coverage in relationship to their catchments are fairly significant, making these wetland features vulnerable to catchment disturbances.

The following buffer areas are recommended and should be implemented for maintaining the freshwater resource features REC (Recommended Ecological Category) allowing the persistence of the current present ecological status as well as their functions and services.

- » A wetland buffer area of 11 m from the outer edge of wetland features are recommended and should be implemented for maintaining the freshwater resource features REC (Recommended Ecological Category) allowing the persistence of the current present ecological status as well as well as their functions and services.
- » All freshwater features with their buffer areas have been classified as either Very High- or High sensitive and should be regarded as "No-Go" areas apart from the following activities and infrastructure which may be allowed (although restricted to an absolute minimum footprint):
 - * only activities relating to the route access and cabling:
 - the use/upgrade of existing roads and watercourse crossings are the preferred options;
 - Where no suitable existing roads and watercourse crossings exist, the construction of new access roads and watercourse crossings can be allowed, however this should be deemed as a last resort.
 - All underground cabling should be laid either within access roads or next to access roads (as close as possible).

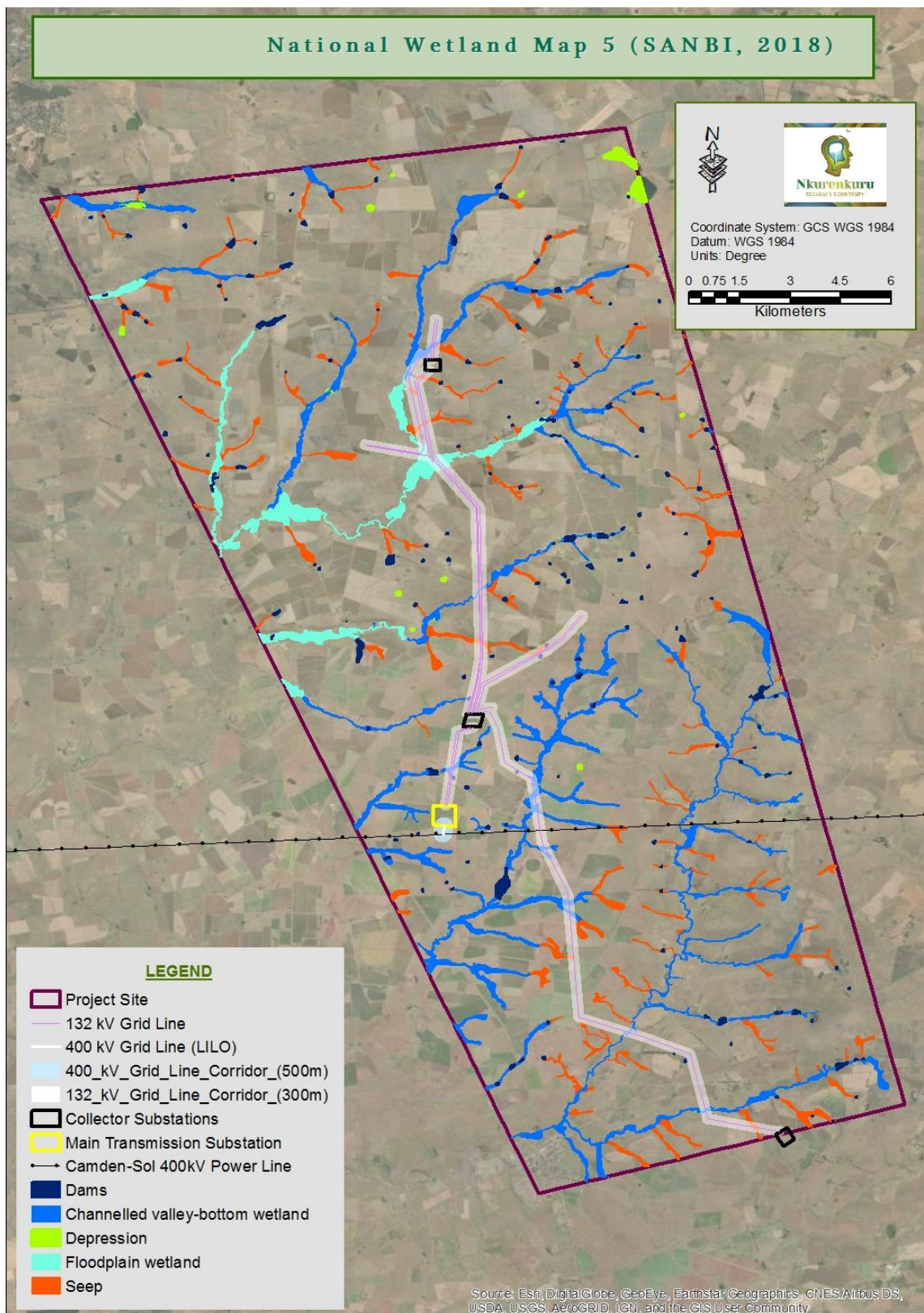


Figure 8.3: Mapping delineated and classified hydrogeomorphic wetland units occurring within the study area in relation to the proposed infrastructure

8.4.2 Description of Impacts on Freshwater Ecology

According to the proposed layout, construction, operation and decommission will lead to potential direct and potential indirect loss of / or damage to freshwater resource features. This may potentially lead to localised loss of freshwater resources and may in-turn lead to downstream impacts that affect a greater extent of freshwater resources or impact on function and biodiversity. Where these habitats are already stressed due to degradation and transformation, the loss may lead to increased vulnerability (susceptibility to future damage) of the habitat. Physical alteration to freshwater resource features can have an impact on the functioning of those features.

Impact of Proposed Substation (Collection and Main Transmission) Infrastructure

For substation locations;

- » Collector Substations 1 & 2 as well as the Main Transmission Substation: the proposed development footprints are located outside of any freshwater resource features and also within fairly similar geographical areas. As such, for all three substation locations, potential impacts associated with the construction, operation and decommission phases will very similar, with activities potentially leading to some indirect loss of / or damage to nearby/downslope freshwater resource features.
- » Collector Substations 3: the proposed development footprint includes a small portion of a seepage wetland which feeds into a fairly large channelled valley-bottom wetland. As such, this potential development will result in some direct impacts on the seepage wetland and also potentially indirect loss of / or damage to downslope freshwater resource features.

Construction and Planning Phase

The development of substations requires initial high intensity disturbances of fairly small surface areas including the clearance of the vegetation cover and the levelling of earth on different terraces where necessary, and the compaction of local soil within the development footprints. Concrete foundations will be necessary. Soil disturbance, vegetation clearance and hardened surfaces will also be associated with temporary laydown and storage areas.

Potential impacts on nearby/downslope freshwater resource features may include:

- » The increase in surface runoff and sediments carried into the nearby down slope freshwater resource features, subsequently potentially impacting local hydrological character of these freshwater resource features (e.g. water quality and hydro-geomorphological character).
- » The potential spread of erosion from the source (within the development footprint area), into the wetland features, subsequently disturbing wetland soils, vegetation cover and local biota.
- » Impairment of functions and services;

There is also the potential for some water quality impacts associated with hydrocarbon spills or associated with the other construction activities on the site. Only a limited amount of water is utilised during construction for the batching of cement and other construction activities.

Generally, with mitigation measures in place, impacts on these downslope freshwater resource features can be avoided or will be localised, short-term and of low intensity and is expected to have a low overall significance in terms of its impact on the identified aquatic ecosystems in the area.

Operation Phase:

During the operation phase the facilities will operate continuously, mostly unattended and with low maintenance required for the duration of the associated REFs' lives (± 20 years). The substations are likely to be monitored and controlled remotely, with maintenance only taking place when required.

The hard surfaces created by the development may lead to increased runoff (reduction in infiltration) and the potential interception and channelling of surface runoff. This may potentially lead to:

- » A modification to the water input characteristic (input in quantity and a change in water input pattern);
- » Increased erosion;
- » Sedimentation of the downslope areas; and
- » Impairment of freshwater resource functions and services

Subsequently, a localised long-term impact (more than 20 years) of low intensity could be expected that would have a very low overall significance post-mitigation in terms of its impact on the identified freshwater resource features in the area.

Decommissioning Phase:

During decommissioning, the potential freshwater impacts will be very similar to that of the Construction Phase, although the potential for water quality and flow related risks will be lower.

The proposed WEF development is anticipated to require high intensity disturbance of a limited surface area at the site of each wind turbine. Concrete foundations for the turbine towers will need to be constructed as well as permanent hard standing bases of compacted gravel adjacent to each turbine location for the cranes used to construct the turbines. Internal substations, warehouses, batching plants, and an Operational and Maintenance Building would also need to be constructed within the site. Temporary laydown areas and a construction site would need to be placed within the site for the construction works.

All of the above-mentioned supporting infrastructure are located well outside any freshwater resource features as well as their associated buffer areas and as such impacts on freshwater resource features will be avoided.

In terms of the location of the wind turbines, no wind turbines are located within any of the delineated freshwater resource features as well as their recommended buffer areas and as such direct impacts on freshwater resource features will be avoided.

Activities during the construction phase of the project could be expected to result in some disturbance of vegetation cover for clearing and preparation of the turbine and supporting infrastructure, this may potentially lead to some indirect impacts on downslope freshwater resource features. There is also the potential for some water quality impacts associated with the batching of concrete, from hydrocarbon spills or associated with the other construction activities on the site. Only a limited amount of water is utilised during construction for the batching of concrete for wind turbines and other construction activities.

Generally, with mitigation measures in place, impacts will be localised, short-term and of low intensity and is expected to have a low to very low overall significance in terms of its impact on the identified aquatic ecosystems in the area.

Impact of Proposed Gridline Infrastructure (400 kV LILO and 132 kV Gridlines)

For the proposed 132 kV Gridline:

- » Twenty-four (24) freshwater resource features have been delineated within the grid corridor. Of these 24 features, located within the survey area, approximately twenty (20) freshwater resource features will likely be spanned by the power line and crossed by service roads.

For the proposed 400 kV LILLO Gridline:

- » No natural wetland feature has been delineated, within the grid corridor.
- » Whilst one artificial wetland feature (small gravel dam) has been identified.
- » This gridline will not directly impact any natural freshwater resource feature.

Construction and Planning Phase

Such power lines require initial high intensity disturbances and vegetation clearance of fairly small surface areas around the pylon locations. Disturbances and vegetation clearance within the remainder of the servitude (right of way) will be minimal and mostly restricted to the twin tracks/service routes. Due to the low growing nature of the vegetation underneath the pylons, vegetation clearance underneath the power lines are unmercenary. Local levelling of earth, compaction of local soil and casting of concrete and cement will be required within the pylon locations. Soil disturbance, vegetation clearance and hardened surfaces will also be associated with temporary laydown and storage areas.

Due to the fact that pylons can span watercourses/wetlands without any placement of pylons within the watercourses themselves, direct impacts relating to the construction of the pylons are avoidable/unlikely. However, during the spanning process some direct impacts/damage may occur to the watercourse/wetland vegetation, however this is expected to be minimal.

The most likely direct impact to the delineated freshwater resource features (to be spanned) will be as a result of watercourse crossings, especially where new crossings will have to be created.

Potential impacts on freshwater resource features may include:

- » The increase in surface runoff and sediments carried into the nearby down slope freshwater resource features, subsequently potentially impacting local hydrological character of these freshwater resource features (e.g. water quality and hydro-geomorphological character).
- » The potential spread of erosion from the source (within the development footprint area), into the wetland features, subsequently disturbing wetland soils, vegetation cover and local biota.
- » Impairment of functions and services;
- » Alteration to the hydrological and hydro-geomorphological character of the wetland as a result of a modification to the wetland morphology (watercourse crossings);
- » Local disturbance and loss of indigenous vegetation cover (watercourse crossings and spanning of the power line across watercourses);
- » Loss of local biota (including potentially rare, endangered, endemic and/or protected species) (watercourse crossings).
- » Fracturing and isolation of wetland features.

There is also the potential for some water quality impacts associated with hydrocarbon spills or associated with the other construction activities on the site. Only a limited amount of water is utilised during construction for the batching of cement and other construction activities.

Generally, with mitigation measures in place, impacts on these downslope freshwater resource features can be avoided or will be localised, short-term and of low intensity and is expected to have a low overall significance in terms of its impact on the identified aquatic ecosystems in the area.

Operation Phase:

During the operation phase the facilities will operate continuously, mostly unattended and with low maintenance required for the duration of the associated REFs' lives (± 20 years). Maintenance on the power line will only take place when required.

The hard and compacted surfaces created around the pylon locations and along the access routes and crossings may lead to increased runoff (reduction in infiltration) and the potential interception and channelling of surface runoff. This may potentially lead to:

- » A modification to the water input characteristic (input in quantity and a change in water input pattern);
- » Increased erosion;
- » Sedimentation of the downslope areas; and
- » Impairment of freshwater resource functions and services

Subsequently, a localised long-term impact (more than 20 years) of low intensity could be expected that would have a very low overall significance post-mitigation in terms of its impact on the identified freshwater resource features in the area.

Decommissioning Phase:

During decommissioning, the potential freshwater impacts will be very similar to that of the Construction Phase, although the potential for water quality and flow related risks will be lower.

8.4.3 Impact tables summarising the significance of impacts on freshwater ecology during construction, operation and decommissioning (with and without mitigation)

8.4.3.1 Impact of Proposed Substation (Collection and Main Transmission) Infrastructure

Construction Phase Impacts

Nature: <u>Loss of freshwater resource features during the construction</u>	
Possible ecological consequences may include:	
<ul style="list-style-type: none"> » Reduction in representation and conservation of freshwater ecosystem/habitat types. » Reduction in the supply of ecosystem goods & services. » Reduction/loss of habitat for aquatic dependent flora & fauna. » Reduction in and/or loss of species of conservation concern (i.e. rare, threatened/endangered species). 	
As already mentioned,	
<ul style="list-style-type: none"> » Only Collector Substation 3 will directly impact an aquatic habitat through the direct disturbance and replacement of a portion of the wetland zones 	
These disturbances will be the greatest during the construction and again in the decommissioning phases as the related disturbances could result in the loss and/or damage to vegetation and alteration of natural geomorphological and hydrological processes within the freshwater resource features. Compacted soils are also not ideal for supporting vegetation growth as they inhibit seed germination.	
	Without mitigation
	With mitigation

Extent	Neighbouring Areas (3)	Local (1)
Duration	Permanent (5)	Long-term (4)
Magnitude	Moderate (6)	Minor (2)
Probability	Highly Probable (4)	Improbable (2)
Significance	Medium (56)	Low (14)
Status (positive or negative)	Negative	Negative
Reversibility	Low – Destruction of wetland vegetation will not be remedied easily.	Low – Destruction of wetland vegetation will not be remedied easily.
Irreplaceable loss of resources?	Local loss of resources	No loss of resources
Can impacts be mitigated?	Yes, to a large extent	

Mitigation:

- » All freshwater resource habitats and their associated buffer areas are regarded as "No-Go" areas.
- » Subsequently the proposed development footprint for the Collector Substation 3 should be amended in order to exclude the wetland area as well as its associated buffer area.
- » The recommended buffer areas between all the delineated freshwater resource features and proposed project activities should be maintained.
- » Infrastructure footprints and associated areas of disturbance should be minimised as far as practically possible
- » Vegetation clearing should occur in a phased manner to minimise erosion and/or run-off.
- » Any areas disturbed during the construction phase should be encouraged to rehabilitate as fast and effective as possible and where deemed necessary by the ECO or Contractor's EO, artificial rehabilitation (e.g. re-seeding with collected or commercial indigenous seed mixes) should be applied in order to speed up the rehabilitation process in critical areas (e.g. steep slopes and unstable soils). Any storm-water within the site must be handled in a suitable manner, i.e. trap sediments, and reduce flow velocities
- » Stormwater from the substations and hard stand areas, must be managed using appropriate channels and swales when located within steeper areas.
- » The runoff should be dissipated over a broad area covered by natural vegetation or managed using appropriate channels and swales.
- » Storm water run-off infrastructure must be maintained to mitigate both the flow and water quality impacts of any storm water leaving the substation sites.
- » No storm water runoff must be allowed to discharge directly into any water course from the substations, and flows from these substations should be allowed to dissipate over a broad area covered by natural vegetation.

Residual Impacts:

Without Mitigation:

- » Locally altered vegetation structure,
- » Possible impact on the remaining catchment due to changes in run-off characteristics in the development site.

With Mitigation:

- » Residual impacts are unlikely to occur within these freshwater resource habitats.

Nature: Increase in sedimentation and erosion

Caused by soil erosion and earthworks that are associated with construction activities.

Possible ecological consequences associated with this impact may include:

- » Deterioration in freshwater ecosystem integrity.
- » Reduction/loss of habitat for aquatic dependent flora & fauna.

This may furthermore, influence water quality downstream.

	Without mitigation	With mitigation
Extent	Local (2)	Local (1)

Duration	Long Term (4)	Short Term (2)
Magnitude	Moderate (5)	Minor (3)
Probability	Highly Probable (4)	Very Improbable (1)
Significance	Medium (40)	Low (6)
Status (positive or negative)	Negative	Negative
Reversibility	Moderate	High
Irreplaceable loss of resources?	Local loss of resources	Unlikely
Can impacts be mitigated?	Yes, to a large extent	
Mitigation:		
<ul style="list-style-type: none"> » All freshwater resource habitats and their associated buffer areas are regarded as "No-Go" areas. » The proposed development footprint for the Collector Substation 3 should be amended in order to exclude the wetland area as well as its associated buffer area. » The recommended buffer areas between the delineated freshwater resource features and proposed project activities should be maintained. » Vegetation clearing should occur in a phased manner to minimise erosion and/or run-off. » Any erosion problems observed to be associated with the project infrastructure should be rectified as soon as possible and monitored thereafter to ensure that they do not re-occur. » All bare areas, as a result of the development, should be revegetated with locally occurring species, to bind the soil and limit erosion potential. » Site rehabilitation should aim to restore surface drainage patterns, natural soil and vegetation as far as is feasible. » An erosion control management plan should be utilised to prevent erosion » There should be reduced activity at the site after large rainfall events when the soils are wet. No driving off of hardened roads should occur immediately following large rainfall events until soils have dried out and the risk of bogging down has decreased. » Any storm-water within the site must be handled in a suitable manner, i.e. trap sediments, and reduce flow velocities » Storm water from the substations and other hard stand areas, must be managed using appropriate channels and swales when located within steep areas. » Storm water run-off infrastructure must be maintained to mitigate both the flow and water quality impacts of any storm water leaving the switching station sites. » Silt traps should be used where there is a danger of topsoil eroding and entering streams and other sensitive areas. » Construction of gabions and other stabilisation features to prevent erosion, if deemed necessary. » No stormwater runoff must be allowed to discharge directly into any water course from the substations, and flows from these switching station sites should be allowed to dissipate over a broad area covered by natural vegetation. 		
Residual Impacts:		
Without the implementation of mitigation measures altered stream bed morphology may result from the development, however this residual impact is highly unlikely to occur if the necessary mitigation measures are implemented.		

Nature: <i>Potential impact on localised surface water quality</i>		
During preconstruction and construction, chemical pollutants (hydrocarbons from equipment and vehicles, cleaning fluids, cement powder, wet concrete, shutter-oil, etc.) associated with site-clearing machinery, construction and maintenance activities could be washed downslope via the ephemeral systems.		
	Without mitigation	With mitigation
Extent	Neighbouring Areas (3)	Local (1)
Duration	Very Short Duration (1)	Very Short Duration (1)
Magnitude	Moderate (7)	Moderate (6)
Probability	Probable (3)	Improbable (2)
Significance	Medium (33)	Low (16)
Status (positive or negative)	Negative	Negative

Reversibility	High	High
Irreplaceable loss of resources?	Local loss of resources	Unlikely
Can impacts be mitigated?	Yes, to a large extent	
Mitigation:		
<ul style="list-style-type: none"> » No activities may be allowed outside of the development areas, and especially within the identified downstream freshwater resource features and their associated buffer areas as these areas are regarded as no-go areas. » Implement appropriate measures to ensure strict use and management of all hazardous materials used on site » Implement appropriate measures to ensure Strict management of potential sources of pollutants (e.g. litter, hydrocarbons from vehicles and machinery, cement during construction etc.) » Store hydrocarbons off site where possible, or otherwise implement hydrocarbon storage using impermeable floors with appropriate bunding, sumps and roofing. » Implement appropriate measures to ensure containment of all contaminated water by means of careful run-off management on the development site. » Implement appropriate measures to ensure strict control over the behavior of construction workers. » Working protocols incorporating pollution control measures (including approved method statements by the contractor) should be clearly set out in the Construction Environmental Management Plan (CEMP) for the project and strictly enforced. » Appropriate ablution facilities should be provided for construction workers during construction and on-site staff during the operation of the substations. » Waste should be stored on site in clearly marked containers in a demarcated area. » All waste material should be removed at the end of every working day to designated waste facilities at the main construction camp/suitable waste disposal facility. » All waste must be disposed of offsite. » Ensure vehicles are regularly serviced so that hydrocarbon leaks are limited. » Designate a single location for refueling and maintenance, outside of any freshwater resource features. » Keep a spill kit on site to deal with any hydrocarbon leaks. » Remove soil from the site which has been contaminated by hydrocarbon spillage. 		
Residual Impacts:		
Residual impacts will be negligible after appropriate mitigation.		

Operation Phase Impacts

Nature: <i>Impact on watercourse/wetland systems through the possible increase in surface runoff on watercourse/wetland form and function during the operation and decommissioning phases</i>		
<p>This might occur during the operation phase, when hard or compacted surfaces (hard engineered surfaces, roads etc.) increase the volume and velocity of the surface runoff. This could impact the hydrological regime through the increase in flows that are concentrated in certain areas. If flows are too concentrated with high velocities, scour and erosion may occur, with a complete reduction or disturbance of riparian habitat.</p>		
	Without mitigation	With mitigation
Extent	Whole Site (2)	Local (1)
Duration	Long Term (4)	Long Term (4)
Magnitude	Moderate (6)	Minor (4)
Probability	Probable (3)	Improbable (2)
Significance	Medium (36)	Low (18)
Status (positive or negative)	Negative	Negative
Reversibility	High	High
Irreplaceable loss of resources?	Unlikely	Unlikely
Can impacts be mitigated?	Yes, to a large extent	
Mitigation:		

- » Any stormwater within the site must be handled in a suitable manner as per the management measures in stormwater management plan.
- » Stormwater from hardstand areas, buildings and the substation must be managed using appropriate channels and swales when located within steep areas.
- » No stormwater runoff must be allowed to discharge directly into the watercourses. The runoff should rather be dissipated over a broad area covered by natural vegetation or managed using appropriate channels and swales when located within steep embankments.
- » Stormwater run-off infrastructure must be maintained to mitigate both the flow and water quality impacts of any stormwater leaving the grid connection infrastructure.

Residual Impacts:

Altered streambed/wetland morphology. Due to the extent and nature of the development this residual impact is unlikely to occur.

Nature: *Increase in sedimentation and erosion*

For the operation phase, this refers to the alteration in the physical characteristics of freshwater resource features as a result of increased turbidity and sediment deposition, caused by soil erosion, as well as instability and collapse of unstable soils during project operation. Possible ecological consequences associated with this impact may include:

- » Deterioration in freshwater ecosystem integrity.
- » Reduction/loss of habitat for aquatic dependent flora & fauna.

	Without mitigation	With mitigation
Extent	Neighbouring Areas (3)	Local (1)
Duration	Long Term (4)	Very Short Duration (1)
Magnitude	Moderate (6)	Minor (4)
Probability	Highly Probable (4)	Probable (3)
Significance	Medium (52)	Low (18)
Status (positive or negative)	Negative	Negative
Reversibility	Moderate	High
Irreplaceable loss of resources?	Local loss of resources	Unlikely
Can impacts be mitigated?	Yes, to a large extent	

Mitigation:

- » All freshwater resource habitats and their associated buffer areas are regarded as "No-Go" areas.
- » Subsequently the proposed development footprint for the Collector Substation 3 should be amended in order to exclude the wetland area as well as its associated buffer area.
- » Any erosion problems observed to be associated with the project infrastructure should be rectified as soon as possible and monitored thereafter to ensure that they do not re-occur.
- » All bare areas, as a result of the development, should be revegetated with locally occurring species, to bind the soil and limit erosion potential.
- » Any stormwater within the site must be handled in a suitable manner, i.e. trap sediments, and reduce flow velocities
- » Stormwater from hardstand areas, buildings and the substation must be managed using appropriate channels and swales when located within steep areas.
- » Stormwater run-off infrastructure must be maintained to mitigate both the flow and water quality impacts of any storm water leaving the grid connection infrastructure.

Residual Impacts:

Altered streambed/wetland morphology. Due to the extent and nature of the development this residual impact is unlikely to occur.

Decommissioning Phase Impacts

Nature: *Loss of freshwater resource features*

Possible ecological consequences may include:

- » Reduction in representation and conservation of freshwater ecosystem/habitat types.
- » Reduction in the supply of ecosystem goods & services.
- » Reduction/loss of habitat for aquatic dependent flora & fauna.
- » Reduction in and/or loss of species of conservation concern (i.e. rare, threatened/endangered species).

As already mentioned,

- » Only Collector Substation 3 will directly impact an aquatic habitat through the direct disturbance and replacement of a portion of the wetland zones.

These disturbances will be the greatest during the construction and again in the decommissioning phases as the related disturbances could result in the loss and/or damage to vegetation and alteration of natural geomorphological and hydrological processes within the freshwater resource features. Compacted soils are also not ideal for supporting vegetation growth as they inhibit seed germination.

	Without mitigation	With mitigation
Extent	Neighbouring Areas (3)	Local (1)
Duration	Permanent (5)	Long-term (4)
Magnitude	Moderate (6)	Minor (2)
Probability	Highly Probable (4)	Improbable (2)
Significance	Medium (56)	Low (14)
Status (positive or negative)	Negative	Negative
Reversibility	Low – Destruction of wetland vegetation will not be remedied easily.	Low – Destruction of wetland vegetation will not be remedied easily.
Irreplaceable loss of resources?	Local loss of resources	No loss of resources
Can impacts be mitigated?	Yes, to a large extent	

Mitigation:

- » All freshwater resource habitats and their associated buffer areas are regarded as “No-Go” areas.
- » Any areas disturbed during the decommissioning phase should be encouraged to be rehabilitated as fast and effective as possible and where deemed necessary by the ECO or Contractor’s EO, artificial rehabilitation (e.g. re-seeding with collected or commercial indigenous seed mixes) should be applied in order to speed up the rehabilitation process in critical areas (e.g. steep slopes and unstable soils).

Residual Impacts:

Without Mitigation:

- » Locally altered vegetation structure,
- » Possible impact on the remaining catchment due to changes in run-off characteristics in the development site.

With Mitigation:

- » Residual impacts are unlikely to occur within these freshwater resource habitats.

Nature: Increase in sedimentation and erosion

Caused by soil erosion and earthworks that are associated with decommissioning activities.

Possible ecological consequences associated with this impact may include:

- » Deterioration in freshwater ecosystem integrity.
- » Reduction/loss of habitat for aquatic dependent flora & fauna.

This may furthermore, influence water quality downstream

	Without mitigation	With mitigation
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Extent	Local (2)	Local (1)
Duration	Long Term (4)	Short Term (2)
Magnitude	Moderate (5)	Minor (3)
Probability	Highly Probable (4)	Very Improbable (1)
Significance	Medium (40)	Low (6)
Status (positive or negative)	Negative	Negative
Reversibility	Moderate	High
Irreplaceable loss of resources?	Local loss of resources	Unlikely
Can impacts be mitigated?	Yes, to a large extent	
Mitigation:		
<ul style="list-style-type: none"> » All freshwater resource habitats and their associated buffer areas are regarded as “No-Go” areas. » Any erosion problems observed should be rectified immediately and monitored thereafter to ensure that they do not re-occur. » There should be regular monitoring for erosion for at least 2 years after decommissioning by the applicant to ensure that no erosion problems develop as a result of the disturbance, and if they do, to immediately implement erosion control measures. » All bare areas, affected by the development, should be re-vegetated with locally occurring species, to bind the soil and limit erosion potential where applicable. » There should be reduced activity at the site after large rainfall events when the soils are wet. No driving off of hardened roads should occur immediately following large rainfall events until soils have dried out and the risk of bogging down has decreased. 		
Residual Impacts:		
Altered streambed morphology. Due to the extent and nature of the development this residual impact is unlikely to occur.		

Nature: <i>Potential impact on localised surface water quality</i>		
During decommissioning, chemical pollutants (hydrocarbons from equipment and vehicles, cleaning fluids, cement powder, wet concrete, shutter-oil, etc.) associated with site-clearing machinery, construction and maintenance activities could be washed downslope via the ephemeral systems.		
	Without mitigation	With mitigation
Extent	Neighbouring Areas (3)	Local (1)
Duration	Very Short Duration (1)	Very Short Duration (1)
Magnitude	Moderate (7)	Minor (4)
Probability	Probable (3)	Improbable (2)
Significance	Medium (33)	Low (12)
Status (positive or negative)	Negative	Negative
Reversibility	High	High
Irreplaceable loss of resources?	Local loss of resources	Unlikely
Can impacts be mitigated?	Yes, to a large extent	
Mitigation:		
<ul style="list-style-type: none"> » Implement appropriate measures to ensure strict use and management of all hazardous materials used on site. » Implement appropriate measures to ensure Strict management of potential sources of pollutants (e.g. litter, hydrocarbons from vehicles and machinery, cement during construction etc.). » Implement appropriate measures to ensure containment of all contaminated water by means of careful run-off management on the development site. » Implement appropriate measures to ensure strict control over the behaviour of decommissioning workers. » Working protocols incorporating pollution control measures (including approved method statements by the contractor) should be clearly set out in a Decommissioning Environmental Management Plan (EMP) for the project and strictly enforced. 		

» Appropriate ablation facilities should be provided for workers during decommissioning of the substation and grid connection infrastructure.

Residual Impacts:

Residual impacts will be negligible after appropriate mitigation.

8.4.3.2 Impact of Proposed Gridline Infrastructure (400 kV LILO and 132 kV Gridlines)

Construction Phase Impacts

Nature: Loss of freshwater resource features during the construction

Possible ecological consequences may include:

- » Reduction in representation and conservation of freshwater ecosystem/habitat types.
- » Reduction in the supply of ecosystem goods & services.
- » Reduction/loss of habitat for aquatic dependent flora & fauna.
- » Reduction in and/or loss of species of conservation concern (i.e. rare, threatened/endangered species).

As already mentioned, only the 132 kV gridline and associated infrastructure will have an impact on wetland habitats.

These disturbances will be the greatest during the construction and again in the decommissioning phases as the related disturbances could result in the loss and/or damage to vegetation and alteration of natural geomorphological and hydrological processes within the freshwater resource features. Compacted soils are also not ideal for supporting vegetation growth as they inhibit seed germination.

	Without mitigation	With mitigation
Extent	Neighbouring Areas (3)	Local (1)
Duration	Permanent (5)	Long-term (4)
Magnitude	Moderate (6)	Small (4)
Probability	Highly Probable (4)	Improbable (2)
Significance	Medium (56)	Low (27)
Status (positive or negative)	Negative	Negative
Reversibility	Low – Destruction of wetland vegetation will not be remedied easily.	Low – Destruction of wetland vegetation will not be remedied easily.
Irreplaceable loss of resources?	Local loss of resources	No loss of resources
Can impacts be mitigated?	Yes, to a large extent	

Mitigation:

- » No pylons may be placed within the delineated wetland features and their associated 15m buffer areas; however, the pylons may span these features.
- » Use as far as possible the existing roads.
- » No activities or movement shall be allowed outside of the approved development footprint.
- » Any erosion problems observed, to be associated with the relating activity, should be rectified as soon as possible and monitored thereafter to ensure that they do not re-occur.
- » Any disturbed areas should be monitored to ensure that these areas do not become subject to invasive alien plant growth.
- » No unnecessary vegetation clearance may be allowed.
- » No vehicles may refuel within watercourses/wetlands/riparian vegetation.
- » Vegetation clearing should occur in a phased manner to minimise erosion and/or run-off.
- » Where no existing wetland road crossings are available the construction of new crossings can be considered.
 - o Where new watercourse/wetland crossings are required, the engineering team must provide an effective means to minimise the potential upstream and downstream effects of sedimentation and erosion (erosion protection) as well minimise the loss of riparian vegetation (reduce footprint as much as possible).

- All crossings over watercourses/wetlands should be such that the flow within the channels is not impeded and should be constructed perpendicular to the river/wetland channel.
- The erosion and stormwater management measures included in the stormwater management plan for the EGI must be implemented.
- Where new roads need to be constructed, the existing road infrastructure should be rationalised and any unnecessary roads decommissioned and rehabilitated to reduce the disturbance of the area within the river beds.
- During the construction phase, monitor culverts to see if erosion issues arise and if any erosion control is required.
- Where possible, culvert bases must be placed as close as possible with natural levels in mind so that these don't form additional steps / barriers.
- Vegetation clearing should occur in a phased manner to minimise erosion and/or run-off.
- Any areas disturbed during the construction phase should be encouraged to rehabilitate as fast and effective as possible and were deemed necessary by the ECO or Contractor's EO, artificial rehabilitation (e.g. re-seeding with collected or commercial indigenous seed mixes) should be applied in order to speed up the rehabilitation process in critical areas (e.g. steep slopes and unstable soils).
- All alien plant re-growth must be monitored, and should it occur, these plants should be eradicated.

Residual Impacts:

Without Mitigation:

- » Locally altered vegetation structure,
- » Possible impact on the remaining catchment due to changes in run-off characteristics in the development site.

With Mitigation:

- » Residual impacts are unlikely to occur within these freshwater resource habitats.

Nature: Increase in sedimentation and erosion

Caused by soil erosion and earthworks that are associated with construction activities.

Possible ecological consequences associated with this impact may include:

- » Deterioration in freshwater ecosystem integrity.
- » Reduction/loss of habitat for aquatic dependent flora & fauna.

This may furthermore, influence water quality downstream.

	Without mitigation	With mitigation
Extent	Neighbouring Areas (3)	Local (1)
Duration	Long Term (4)	Short Term (2)
Magnitude	Moderate (6)	Minor (3)
Probability	Highly Probable (4)	Probable (3)
Significance	Medium (52)	Low (18)
Status (positive or negative)	Negative	Negative
Reversibility	Moderate	High
Irreplaceable loss of resources?	Local loss of resources	Unlikely
Can impacts be mitigated?	Yes, to a large extent	

Mitigation:

- » The duration of construction work within the watercourses/wetlands must be minimised as far as practically possible through proper planning and phasing.
- » Use existing service roads as far as possible when crossing any watercourses/wetlands.
- » Where new watercourse/wetland crossings are required, the engineering team must provide an effective means to minimise the potential upstream and downstream effects of sedimentation and erosion (erosion protection) as well minimise the loss of riparian/wetland vegetation (reduce footprint as much as possible).

- » All crossings over watercourses/wetlands should be such that the flow within the channels is not impeded and should be constructed perpendicular to the river channel/ and wetland feature.
- » During the construction phase, monitor culverts to see if erosion issues arise and if any erosion control is required.
- » Where possible, culvert bases must be placed as close as possible with natural levels in mind so that these don't form additional steps / barriers.
- » Any erosion observed to be associated with the project infrastructure should be rectified as soon as possible and monitored thereafter to ensure that they do not re-occur.
- » Any areas disturbed during the construction phase should be encouraged to rehabilitate as fast and effective as possible and were deemed necessary by the ECO or Contractor's EO, artificial rehabilitation (e.g. re-seeding with collected or commercial indigenous seed mixes) should be applied in order to speed up the rehabilitation process in critical areas (e.g. steep slopes and unstable soils).
- » Silt traps should be used where there is a danger of topsoil or material stockpiles eroding and entering streams and other sensitive areas.
 - o These silt traps must be regularly monitored and maintained and replaced / repaired immediately as and when required. These measures should be regularly checked, maintained and repaired when required to ensure that they are effective
- » Topsoil should be removed and stored separately outside of wetland areas and should be re-applied where appropriate as soon as possible, to encourage and facilitate the rapid regeneration of the natural vegetation on cleared areas.
- » Where practical, phased development and vegetation clearing should be applied so that cleared areas are not left un-vegetated and vulnerable to erosion for extended periods.
- » Construction of gabions and other stabilisation features to prevent erosion if deemed necessary.
- » There should be reduced activity at the site after large rainfall events when the soils are wet. No driving off of hardened roads should occur immediately following large rainfall events until soils have dried out and the risk of bogging down has decreased.

Residual Impacts:

Altered streambed morphology. Due to the extent and nature of the development this residual impact is unlikely to occur.

Nature: *Potential impact on localised surface water quality*

During preconstruction and construction, chemical pollutants (hydrocarbons from equipment and vehicles, cleaning fluids, cement powder, wet concrete, shutter-oil, etc.) associated with site-clearing machinery, construction and maintenance activities could be washed downslope via the ephemeral systems.

	Without mitigation	With mitigation
Extent	Neighbouring Areas (3)	Local (1)
Duration	Very Short Duration (1)	Very Short Duration (1)
Magnitude	Moderate (7)	Minor (4)
Probability	Probable (3)	Improbable (2)
Significance	Medium (33)	Low (12)
Status (positive or negative)	Negative	Negative
Reversibility	High	High
Irreplaceable loss of resources?	Local loss of resources	Unlikely
Can impacts be mitigated?	Yes, to a large extent	

Mitigation:

- » No activities may be allowed outside of the development area.
- » Implement appropriate measures to ensure strict control over the behavior of construction workers.
- » Appropriate ablution facilities should be provided for construction workers.
- » Working protocols incorporating pollution control measures (including approved method statements by the Contractor) should be clearly set out in the Construction Environmental Management Plan (CEMP) for the project and strictly enforced.

- » Implement appropriate measures to ensure strict use and management of all hazardous materials used on site.
- » Implement appropriate measures to ensure strict management of potential sources of pollutants (e.g. litter, hydrocarbons from vehicles and machinery, cement during construction etc.).
- » Waste should be stored on site in clearly marked containers in a demarcated area.
- » All waste material should be removed at the end of every working day to designated waste facilities at the main construction camp/suitable waste disposal facility.
- » All waste must be disposed of offsite.
- » Working protocols incorporating pollution control measures and approved method statements for the project must be strictly enforced and implemented by the contractor/s.
- » Implement appropriate measures to ensure the containment of all contaminated water through careful run-off management on the development site.
- » Store hydrocarbons off site where possible, or otherwise implement hydrocarbon storage using impermeable floors with appropriate bunding, sumps and roofing.
- » Handle hydrocarbons carefully to limit spillage.
- » Ensure vehicles are regularly serviced so that hydrocarbon leaks are limited.
- » Designate a single location for refueling and maintenance, outside of any freshwater resource features.
- » Keep a spill kit on site to deal with any hydrocarbon leaks.
- » Remove soil from the site which has been contaminated by hydrocarbon spillage.

Residual Impacts:

Residual impacts will be negligible after appropriate mitigation.

Operation Phase Impacts

Nature: *Impact on watercourse/wetland systems through the possible increase in surface runoff on watercourse/wetland form and function during the operation and decommissioning phases*

This might occur during the operation phase, when hard or compacted surfaces (hard engineered surfaces, roads etc.) increase the volume and velocity of the surface runoff. This could impact the hydrological regime through the increase in flows that are concentrated in certain areas. If flows are too concentrated with high velocities, scour and erosion may occur, with a complete reduction or disturbance of riparian habitat.

	Without mitigation	With mitigation
Extent	Local (1)	Local (1)
Duration	Long Term (4)	Long Term (4)
Magnitude	Small (4)	Minor (2)
Probability	Probable (3)	Improbable (2)
Significance	Low (27)	Low (14)
Status (positive or negative)	Negative	Negative
Reversibility	High	High
Irreplaceable loss of resources?	Unlikely	Unlikely
Can impacts be mitigated?	Yes, to a large extent	

Mitigation:

- » No stormwater runoff must be allowed to discharge directly into any water course along roads, and flows should thus be allowed to dissipate over a broad area covered by natural vegetation.
- » For the crossing of small wetlands with gentle gradients:
 - o Road structures should be stabilized up to the level of the watercourse bed to allow for natural flow across the road.
 - o It is crucial that the road surface is level within the watercourse without any flow concentration.
- » Where the road structure will be built up to the level of the terrestrial land adjacent to the river/wetland bed (larger watercourses/wetland with stronger flows, deeper channels and steeper embankments):
 - o Engineering team must provide an effective means to allow/simulate natural flow patterns without the consecration/modification of flow through the culverts which must be incorporated into the detailed stormwater management plans based on the final design .

- o Culverts should be sized to transport not only water, but other materials that might be mobilized (i.e. debris) and cause blockages to flow.
- o Appropriate erosion protection measures must be installed to reduce bed erosion / scour.
- » The base (invert) of culverts must be aligned with the natural ground level of the bed of the channel to limit risks of erosion. Where necessary, additional measures such as drop-inlets or stepped inlet weirs must be constructed to address such risks.

Residual Impacts:

Altered streambed/wetland morphology. Due to the extent and nature of the development this residual impact is unlikely to occur.

Nature: Increase in sedimentation and erosion

For the operation phase, this refers to the alteration in the physical characteristics of freshwater resource features as a result of increased turbidity and sediment deposition, caused by soil erosion, as well as instability and collapse of unstable soils during project operation. Possible ecological consequences associated with this impact may include:

- » Deterioration in freshwater ecosystem integrity.
- » Reduction/loss of habitat for aquatic dependent flora & fauna.

	Without mitigation	With mitigation
Extent	Neighbouring Areas (3)	Local (1)
Duration	Long Term (4)	Very Short Duration (1)
Magnitude	Moderate (5)	Small (3)
Probability	Probable (3)	Probable (3)
Significance	Medium (36)	Low (15)
Status (positive or negative)	Negative	Negative
Reversibility	Moderate	High
Irreplaceable loss of resources?	Local loss of resources	Unlikely
Can impacts be mitigated?	Yes, to a large extent	

Mitigation:

- » Any disturbed areas should be encouraged to be rehabilitated as fast and effective as possible and were deemed necessary by the ECO or Contractor's EO, artificial rehabilitation (e.g. re-seeding with collected or commercial indigenous seed mixes) should be applied in order to speed up the rehabilitation process in critical areas (e.g. steep slopes and unstable soils).
- » Any erosion problems observed should be rectified as soon as possible and monitored thereafter to ensure that they do not re-occur.
- » Silt traps should be used where there is a danger of topsoil eroding and entering streams and other sensitive areas.
- » These silt traps must be regularly monitored and maintained and replaced / repaired immediately as and when required. These measures should be regularly checked, maintained and repaired when required to ensure that they are effective

Residual Impacts:

Altered streambed/wetland morphology. Due to the extent and nature of the development this residual impact is unlikely to occur.

Decommissioning Phase Impacts

Nature: Loss of freshwater resource features

Possible ecological consequences may include:

- » Reduction in representation and conservation of freshwater ecosystem/habitat types.
- » Reduction in the supply of ecosystem goods & services.
- » Reduction/loss of habitat for aquatic dependent flora & fauna.
- » Reduction in and/or loss of species of conservation concern (i.e. rare, threatened/endangered species).

As already mentioned, only the 132 kV gridline and associated infrastructure will have an impact on wetland habitats.

These disturbances will be the greatest during the construction and again in the decommissioning phases as the related disturbances could result in the loss and/or damage to vegetation and alteration of natural geomorphological and hydrological processes within the freshwater resource features. Compacted soils are also not ideal for supporting vegetation growth as they inhibit seed germination.

	Without mitigation	With mitigation
Extent	Neighbouring Areas (3)	Local (1)
Duration	Permanent (5)	Long-term (4)
Magnitude	Moderate (6)	Minor (4)
Probability	Highly Probable (4)	Probable (3)
Significance	Medium (56)	Low (27)
Status (positive or negative)	Negative	Negative
Reversibility	Low – Destruction of wetland vegetation will not be remedied easily.	Low – Destruction of wetland vegetation will not be remedied easily.
Irreplaceable loss of resources?	Local loss of resources	No loss of resources
Can impacts be mitigated?	Yes, to a large extent	

Mitigation:

- » During decommissioning, disturbance to the freshwater ecosystems should be limited as far as possible.
- » Disturbed areas will need to be rehabilitated and revegetated.
- » Any erosion problems observed, to be associated with the relating activity, should be rectified as soon as possible and monitored thereafter to ensure that they do not re-occur.
- » No unnecessary vegetation clearance may be allowed.
- » No vehicles may refuel within watercourses/wetlands/riparian vegetation.
- » No activities or movement shall be allowed outside of the approved decommissioning footprint.
- » Mitigation and follow up monitoring of residual impacts (alien vegetation growth and erosion) will be required.

Residual Impacts:

Without Mitigation:

- » Locally altered vegetation structure,
- » Possible impact on the remaining catchment due to changes in run-off characteristics in the development site.

With Mitigation:

- » Residual impacts are unlikely to occur within these freshwater resource habitats.

Nature: Increase in sedimentation and erosion

Caused by soil erosion and earthworks that are associated with decommissioning activities.

Possible ecological consequences associated with this impact may include:

- » Deterioration in freshwater ecosystem integrity.
- » Reduction/loss of habitat for aquatic dependent flora & fauna.

This may furthermore, influence water quality downstream

	Without mitigation	With mitigation
Extent	Neighbouring Areas (3)	Local (1)
Duration	Long Term (4)	Short Term (2)
Magnitude	Moderate (6)	Minor (3)
Probability	Highly Probable (4)	Probable (3)
Significance	Medium (52)	Low (18)

Status (positive or negative)	Negative	Negative
Reversibility	Moderate	High
Irreplaceable loss of resources?	Local loss of resources	Unlikely
Can impacts be mitigated?	Yes, to a large extent	
Mitigation:		
<ul style="list-style-type: none"> » The duration of decommissioning work within the watercourses/wetlands must be minimised as far as practically possible through proper planning and phasing. » Watercourse/wetland areas other than the immediate impact areas are to be demarcated as no-go areas for vehicles and construction personnel. The immediate decommissioning site within a watercourse/wetland area is therefore permissible for activities associated with the decommissioning phase. » Any areas disturbed during the construction phase should be encouraged to rehabilitate as fast and effective as possible and were deemed necessary by the ECO or Contractor's EO, artificial rehabilitation (e.g. re-seeding with collected or commercial indigenous seed mixes) should be applied in order to speed up the rehabilitation process in critical areas (e.g. steep slopes and unstable soils). » Any erosion problems observed during the construction and operational phases should be rectified as soon as possible and monitored thereafter to ensure that they do not re-occur. » There should be regular monitoring for erosion for at least 2 years after decommissioning by the applicant to ensure that no erosion problems develop as a result of the disturbance, and if they do, to immediately implement erosion control measures. » Silt traps should be used where there is a danger of topsoil eroding and entering streams and other sensitive areas. <ul style="list-style-type: none"> o These silt traps must be regularly monitored and maintained and replaced / repaired immediately as and when required. These measures should be regularly checked, maintained and repaired when required to ensure that they are effective » Excavated soils should be stockpiled on the upslope side of the excavated trench so that eroded sediments off the stockpile are washed back into the trench; » Excavated soils will need to be replaced in the same order as excavated from the trench, i.e. sub-soil must be replaced first and topsoil must be replaced last (this will maximise opportunity for re-vegetation of disturbed areas). » There should be reduced activity during the decommissioning phase at the site after large rainfall events when the soils are wet. No driving off of hardened roads should occur immediately following large rainfall events until soils have dried out and the risk of bogging down has decreased. 		
Residual Impacts:		
Altered streambed morphology. Due to the extent and nature of the development this residual impact is unlikely to occur.		

Nature: <u>Potential impact on localised surface water quality</u>		
During decommissioning, chemical pollutants (hydrocarbons from equipment and vehicles, cleaning fluids, cement powder, wet concrete, shutter-oil, etc.) associated with site-clearing machinery, construction and maintenance activities could be washed downslope via the ephemeral systems.		
	Without mitigation	With mitigation
Extent	Neighbouring Areas (3)	Local (1)
Duration	Very Short Duration (1)	Very Short Duration (1)
Magnitude	Moderate (7)	Minor (4)
Probability	Probable (3)	Improbable (2)
Significance	Medium (33)	Low (12)
Status (positive or negative)	Negative	Negative
Reversibility	High	High
Irreplaceable loss of resources?	Local loss of resources	Unlikely
Can impacts be mitigated?	Yes, to a large extent	
Mitigation:		

- » Implement appropriate measures to ensure strict use and management of all hazardous materials used on site
- » Implement appropriate measures to ensure Strict management of potential sources of pollutants (e.g. litter, hydrocarbons from vehicles and machinery, cement during construction etc.)
- » Implement appropriate measures to ensure containment of all contaminated water by means of careful run-off management on the development site.
- » Implement appropriate measures to ensure strict control over the behavior of construction workers.
- » Working protocols incorporating pollution control measures (including approved method statements by the contractor) should be clearly set out in the Construction Environmental Management Plan (CEMP) for the project and strictly enforced.
- » Appropriate ablution facilities should be provided for construction workers during construction and on-site staff during the operation of the substation and grid connection infrastructure.

Residual Impacts:

Residual impacts will be negligible after appropriate mitigation.

8.4.4 Overall Result

All endorheic wetland features, wetland features that are not directly connected to the larger extensive wetland network or that have been fractured/isolated through agricultural practices are classified as High Sensitive. Even though these wetland features do not provide functions and services to the extent of the more connected and larger wetland features, these wetlands still provide some functions and services. Furthermore, most of these wetland features are fairly small and any direct impacts on these wetland habitats may have a significant impact on the drivers of these wetland features as well as the associated biodiversity. Another feature of these wetlands is the fact that, even though small in size, they are located within relatively small catchment areas, thus these wetlands' percentage coverage in relationship to their catchments are fairly significant, making these wetland features vulnerable to catchment disturbances.

The following buffer areas are recommended and should be implemented for maintaining the freshwater resource features REC (Recommended Ecological Category) allowing the persistence of the current present ecological status as well as their functions and services.

- » A wetland buffer area of 11 m from the outer edge of wetland features are recommended and should be implemented for maintaining the freshwater resource features REC (Recommended Ecological Category) allowing the persistence of the current present ecological status as well as their functions and services.
- » All freshwater features with their buffer areas have been classified as either Very High- or High sensitive and should be regarded as "No-Go" areas apart from the following activities and infrastructure which may be allowed (although restricted to an absolute minimum footprint):
 - * only activities relating to the route access and cabling:
 - the use/upgrade of existing roads and watercourse crossings are the preferred options;
 - Where no suitable existing roads and watercourse crossings exist, the construction of new access roads and watercourse crossings can be allowed, however this should be deemed as a last resort.
 - All underground cabling should be laid either within access roads or next to access roads (as close as possible).

With mitigation measures in place, impacts on the freshwater resource features' integrity and functioning can be potentially reduced to sufficiently low levels. This would be best achieved by incorporating the recommended management & mitigation measures into an Environmental Management Programme

(EMPr) for the site, together with appropriate rehabilitation guidelines and ecological monitoring recommendations.

Based on the outcomes of this study it is my considered opinion that the proposed project detailed in this report could be authorised from a freshwater resource perspective.

Since there are watercourses present within the development area of the Umbila Emoyeni Solar Energy Facility as identified in the Freshwater Impact Assessment (**Appendix D**), and since water may be abstracted from boreholes for use during the construction and operational phases, a water use authorisation for the project will be required from the DWS for water uses identified in Section 21 (a), Section 21 (c) and 21 (i) of the National Water Act (Act 36 of 1998).

8.5. Potential Impacts on Avifauna

The development of the Umbila Emoyeni EGI is likely to result in a variety of impacts from an avifaunal perspective. Potential impacts and the relative significance of the impacts are summarised below (refer to **Appendix F** for more details).

8.5.1 Results of the Avifauna Impact Assessment

Summary Pre-Construction Bird Monitoring

Pre-construction bird monitoring was undertaken over a period of 12 months within the project area. The pre-construction bird monitoring included the identification of twelve vantage points, five drive transects, and 15 walk transects of 500m in length across the project site. A total of 102 species (5 805 birds) were recorded during the walk transects conducted across the full pre-construction bird monitoring period.

A total of 26 target species were recorded during vantage point monitoring over the pre-application monitoring period. A total of 72 observations of 18 target species (comprising 235 birds) were recorded during 703.12km of drive transect observations. Avifauna target species identified during the full pre-construction monitoring period are as follows:

- » African Harrier-hawk
- » Amur Falcon
- » Black Sparrowhawk
- » Black-chested Snake-eagle
- » Black-winged Kite
- » Black-winged Pratincole
- » Blue Crane
- » Blue Korhaan
- » Cape Vulture
- » Common Buzzard
- » Greater Kestrel
- » Grey-crowned Crane
- » Grey-winged Francolin
- » Lanner Falcon
- » Marsh Owl
- » Martial Eagle

- » Montagu's Harrier
- » Northern Black Korhaan
- » Pallid Harrier
- » Peregrine Falcon
- » Rock Kestrel
- » Secretarybird
- » Southern Bald Ibis
- » Spotted Eagle-owl
- » White Stork
- » Yellow-billed Kite

Avifaunal Sensitivity

Many species of conservation concern in the broader area identified during the Reconnaissance Study as having potential to occur in the project site were not recorded during the full pre-construction avifaunal monitoring programme. Notably no Black Harrier, African Marsh Harrier, Black Stork, Wattled Crane, African Grass Owl, Botha's Lark, Rudd's Lark or Yellow-breasted Pipit were recorded. This is likely due to the high level of existing habitat modification and existing impacts across the preferred site. Nevertheless, impacts to remaining areas of natural or near-natural habitat should be avoided or reduced as far as practically possible. To reduce or avoid impacts on sensitive habitats such as wetland environments, these areas are to be avoided and flow-control measures are to be implemented to reduce potential effects of erosion or sedimentation altering the hydrology of the area. These areas are considered to have the highest avifaunal sensitivity, as such features attract birds (such as Blue Crane, Black-winged Pratincole, Greater Flamingo, Grey-crowned Crane and waterfowl) and rivers/drainage lines are often used as movement corridors. Other patches of natural vegetation are considered to be medium sensitivity due to their overall contribution to habitat connectivity for species within the IBA and foraging areas for species such as Secretarybird, Blue Korhaan, Denham's Bustard and Black-winged Pratincole, amongst others.

The primary threat to these species is likely to rather be associated with the risk of collision fatalities, therefore areas and flights that appeared to represent preferred foraging or movement corridors for avifaunal SCCs were considered to have high avifaunal sensitivity. Species utilising the highly modified agricultural areas are likely resilient to disturbance and ongoing activity, including habitat modification. These areas are of low avifaunal sensitivity and are the preferred areas for development activities as well as permanent and temporary structures such as site buildings and lay-down areas. However, species utilising these areas, such as Southern Bald Ibis, remain at risk to collision when commuting to and from foraging areas.

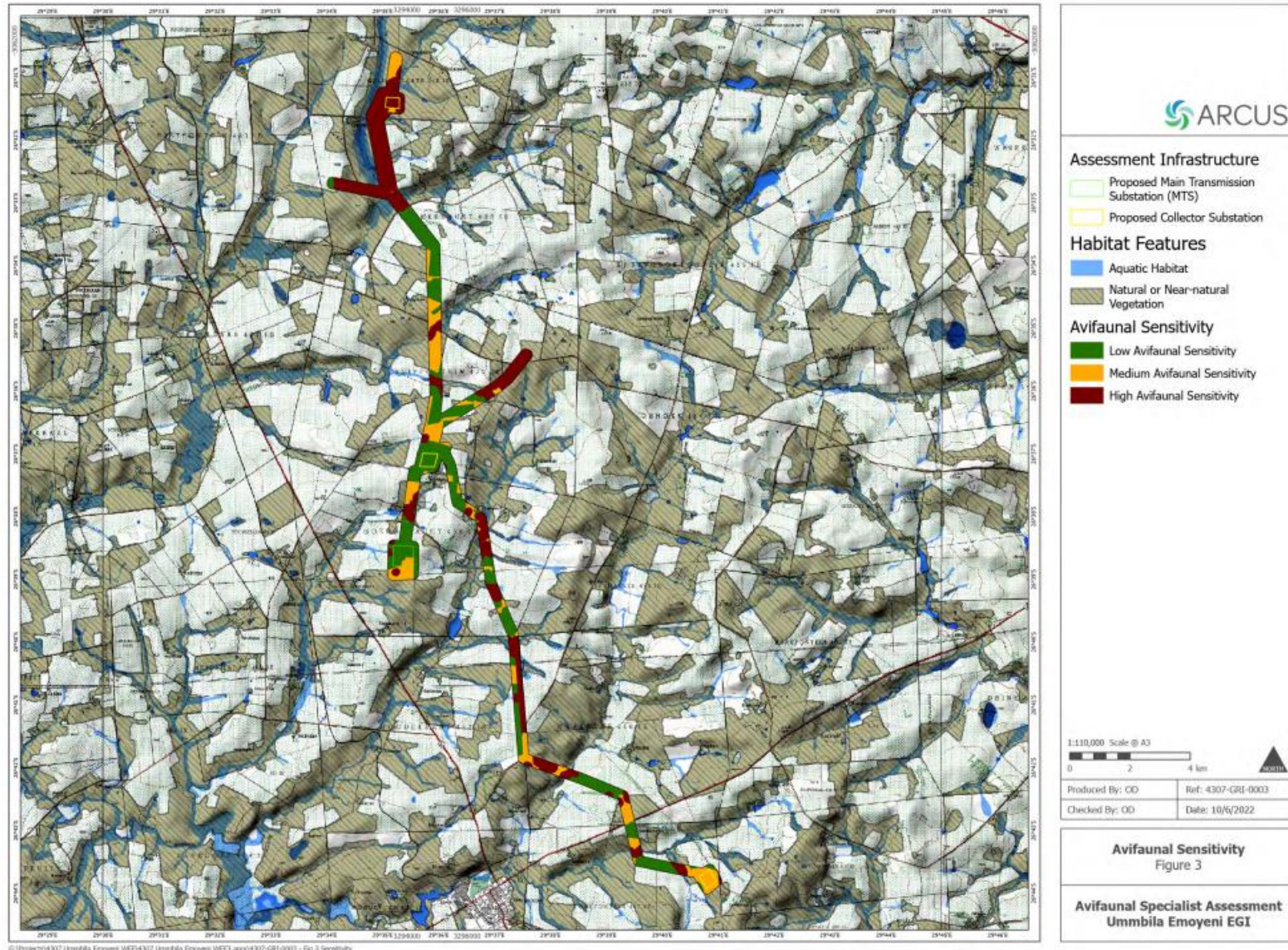


Figure 8.4: Avifaunal sensitivities overlain on the indicative layout.

8.5.2 Description of Avifaunal Impacts

The following key potential impacts on avifauna, arising from the proposed development of the EGI, have been identified for assessment:

Construction Phase:

- » Direct habitat destruction – modification, removal and clearing of vegetation for development of infrastructure such as substations, temporary laydown areas, site buildings, servitudes and access roads.
- » Disturbance/displacement – indirect habitat loss and/or reduced breeding success due to displacement by noise and activity associated with machinery and construction activity.
- » Direct mortality – fatalities of avifauna due to vehicle collision, entrapment, entanglement or collision with temporary infrastructure (e.g., fencing), entrapment in uncovered excavations and increase predation pressure.

Operation phase:

- » Disturbance/displacement – indirect habitat loss, reduced breeding success, obstruction of movement corridors due to displacement by infrastructure and noise/activity associated with ongoing, routine operational tasks/maintenance activities.
- » Direct mortality – fatalities of avifauna due to collision or entrapment with perimeter fencing, and electrocution from electrical components.

Decommissioning phase:

- » As per construction phase.
- »

8.5.3 Impact tables summarising the significance of impacts on avifauna during construction, operation and decommissioning (with and without mitigation)

Construction Phase Impacts

Nature: <u>Direct habitat destruction</u>		
Habitat destruction during the construction phase is unlikely to result in a significant negative impact to populations of SCCs following the implementation of mitigation measures as the footprint area of the development is relatively small in the context of the habitat available in broader area as the habitats present in the proposed development site are not unique to the site and the agricultural/natural matrix is similar throughout the broader area.		
Mesic Highveld grasslands receive relatively high rainfall and habitats are sensitive to alterations of flow regimes and infiltration rates, with wetlands forming an important component for many avifaunal species in the area. Several potential risks to the long-term functioning and persistence of these environments exist which, if unmitigated, could result in the long-term degradation or permanent loss of habitats both across the site and down-stream. Fortunately, the potential risks are relatively easy to mitigate very effectively and are largely standard practice for these types of developments.		
Mitigation measures largely include avoiding areas of elevated sensitivity wherever possible, utilising existing access routes as far as possible and implementing appropriate erosion control measures to reduce down-stream effects of erosion, associated habitat loss, sedimentation and changes to infiltration/flow regimes.		
	Without mitigation	With mitigation
Extent	Local (2)	Footprint (1)
Duration	Long-term (4)	Short-term (2)
Magnitude	Low (4)	Minor (2)
Probability	Distinct Possibility (3)	Distinct Possibility (3)
Significance	Medium (30)	Low (15)

Status (positive or negative)	Negative	Negative
Reversibility	Yes	Yes
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Partially	
<p>Mitigation:</p> <ul style="list-style-type: none"> » Pre-construction walk-through of the approved development footprint must be undertaken to ensure that sensitive habitats and species are avoided wherever possible. » Laydown and other temporary infrastructure to be placed within Low sensitivity areas, preferably previously transformed areas, wherever possible. » Appropriate run-off and erosion control measures are to be implemented where required. » A site-specific environmental management programme (EMPr) must be implemented, which gives appropriate and detailed description of how construction activities must be conducted to reduce unnecessary destruction of habitat (e.g. no open fires outside of designated areas). » All contractors are to adhere to the EMPr and should apply good environmental practice during construction. » All hazardous materials should be stored in the appropriate manner to prevent contamination of the site and downstream environments. Any accidental chemical, fuel and oil spills that occur at the site should be cleared as appropriate for the nature of the spill. » Existing roads and farm tracks should be used where possible. » The minimum footprint areas of infrastructure should be used wherever possible, including road widths and lengths. » No off-road driving should be permitted in areas not identified for clearing. » An Environmental Site Officer (ESO) must form part of the on-site team to ensure that the EMPr is implemented and enforced and an Environmental Control Officer (ECO) must be appointed to oversee the implementation activities and monitor compliance for the duration of the construction phase. » Following construction, rehabilitation of areas disturbed by temporary laydown areas and facilities must be undertaken. 		
<p>Residual Impacts:</p> <p>Habitat cleared for the construction of permanent facilities will not be available for use by many avifaunal species during the operational lifespan of the development. No long-term residual impacts are likely to negatively influence the viability or persistence of the avifaunal community of the receiving environment as permanent infrastructure have a small development footprint relative to the available habitat in the broader area and are largely located on currently modified areas (i.e. agricultural land).</p>		

Nature: Disturbance and Displacement

Indirect loss of habitat from disturbance during the construction phase is temporary in nature and is expected to result largely from the presence of heavy machinery and increased activity of construction personnel. The remaining patches of natural or near-natural vegetation that occur across the site are already under existing levels of disturbance from agricultural activities that include the regular use of large agricultural machinery required for commercial crop production in immediately adjacent fields. Similarly, disturbance resulting from grazing of livestock occur within the natural or near-natural areas themselves and therefore it is expected that any species particularly sensitive to anthropogenic disturbance are unlikely to occur within the proposed project area through displacement by existing impacts. Southern Bald Ibis for example are resistant to disturbance and are commonly observed foraging alongside agricultural machinery.

In addition, the habitats present in the vicinity of the proposed development are not unique to the site and are relatively widespread in the area so any displacement from the immediate vicinity that may occur will not likely incur a high energetic cost as suitable habitat is widely available nearby. The proximity of nearby suitable habitat makes it likely that species will return to areas that have not been physically altered by the proposed development once construction activity ceases.

There are no confirmed active nest locations in proximity to the proposed development site where breeding success is likely to be negatively impacted upon through disturbance or displacement during the construction phase.		
	Without mitigation	With mitigation
Extent	Local (2)	Local (2)
Duration	Very Short-term (1)	Very Short-term (1)
Magnitude	Minor (2)	Minor (2)
Probability	Low Likelihood (2)	Low Likelihood (2)
Significance	Low (10)	Low (10)
Status (positive or negative)	Negative	Negative
Reversibility	Yes	Yes
Irreplaceable loss of resources?	Unlikely	Unlikely
Can impacts be mitigated?	Yes	
Mitigation:		
<ul style="list-style-type: none"> » A site specific EMPr must be implemented, which gives appropriate and detailed description of how construction activities must be conducted. » All contractors are to adhere to the EMPr and should apply good environmental practice during construction. » Environmental Officer to oversee activities and ensure that the site specific EMPr is implemented and enforced. » Maximum use of existing access road and servitudes. » Existing and novel access roads are to be suitably upgraded or constructed to prevent damage and erosion resulting from increased vehicular traffic and construction vehicles. » No off-road driving in undesignated areas. » Speed limits (30 km/h) should be strictly enforced on site to reduce unnecessary noise. » Construction camps should be lit with as little light as practically possible, with the lights directed downwards where appropriate. » The movement of construction personnel should be restricted to the construction areas on the project site. » No dogs or cats other than those of the landowners should be allowed on site. » The appointed Environmental Officer must be trained to identify the potential Red Data species as well as the signs that indicate possible breeding by these species. » The Environmental Officer must then, during audits/site visits, make a concerted effort to look out for such breeding activities of SCCs (e.g. cranes, Secretarybird), and such efforts may include the training of construction staff (e.g. in Toolbox talks) to identify Red Data species, followed by regular questioning of staff as to the regular whereabouts on site of these species. » If any avifaunal SCCs are confirmed to be breeding (e.g. if a nest site is found), construction activities within 500 m of the breeding site must cease, and an avifaunal specialist is to be contacted immediately for further assessment of the situation and instruction on how to proceed. » Prior to construction, an avifaunal specialist should conduct a site walkthrough, covering the final road and power line routes as well as temporary laydown areas and facilities, to identify any nests/breeding/roosting activity of sensitive species. » The results of which may inform the final construction schedule in close proximity to that specific area, including abbreviating construction time, scheduling activities around breeding activity, and lowering levels of associated noise. 		
Residual Impacts:		
None.		

Nature: Direct Mortality

Fatalities of avifaunal species can occur through collision with vehicles as traffic in the area increases due to construction activity. Large-bodied and ground dwelling species (e.g. korhaans and bustards) are at increased risk, but this impact can be effectively mitigated against. Temporary fencing can result in collisions, entrapment or entanglement if not suitably installed. Similarly ground dwelling avifauna (particularly chicks) can fall into uncovered excavations and become entrapped.

	Without mitigation	With mitigation
Extent	Local (2)	Local (2)
Duration	Very Short-term (1)	Very Short-term (1)
Magnitude	Minor (2)	Minor (2)
Probability	Distinct Possibility (3)	Low Likelihood (2)
Significance	Low (15)	Low (10)
Status (positive or negative)	Negative	Negative
Reversibility	Yes	Yes
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Yes	
Mitigation:		
<ul style="list-style-type: none"> » Maximum use of existing access road and servitudes. » No off-road driving in undesignated areas. » Speed limits (30 km/h) should be strictly enforced on site to reduce probability of vehicle collisions. » The movement of construction personnel should be restricted to the construction areas on the project site. » No dogs or cats other than those of the landowners should be allowed on site. » Any holes dug should not be left open for extended periods of time to prevent entrapment by ground dwelling avifauna or their young and only be dug when required and filled in soon thereafter. » Temporary fencing must be suitably constructed, e.g. if double layers of fencing are required for security purposes they should be positioned at least 2 m apart to reduce the probability of entrapment by larger bodied species that may find themselves between the two fences. » Roadkill is to be reported to the ECO and removed as soon as possible. 		
Residual Impacts:		
None.		

Operation Phase Impacts

Nature: <i>Disturbance and Displacement</i>		
<p>Indirect loss of habitat from disturbance during the operational phase is associated with ongoing operational activity as well as more discrete periods of routine maintenance tasks. As per the construction phase, the avifauna in the area already experience levels of disturbance and therefore species particularly sensitive to disturbance are unlikely to frequent the area.</p>		
	Without mitigation	With mitigation
Extent	Local (2)	Local (2)
Duration	Very Short-term (1)	Very Short-term (1)
Magnitude	Minor (2)	Minor (2)
Probability	Low Likelihood (2)	Low Likelihood (2)
Significance	Low (10)	Low (10)
Status (positive or negative)	Negative	Negative
Reversibility	Yes	Yes
Irreplaceable loss of resources?	Unlikely	Unlikely
Can impacts be mitigated?	Yes	
Mitigation:		
<ul style="list-style-type: none"> » A site specific operational EMP must be implemented, which gives appropriate and detailed description of how operational and maintenance activities must be conducted to reduce unnecessary disturbance; » All contractors are to adhere to the environmental management programme and should apply good environmental practice during all operations; and » Operational phase bird monitoring, in line with the latest available guidelines, must be implemented. 		
Residual Impacts:		
None.		

Nature: Collision with Infrastructure

Collisions with large (132 kV or above) power lines are a well-documented threat to birds in southern Africa. Heavy-bodied birds such as bustards, cranes and waterbirds, with limited manoeuvrability, are susceptible to this impact. The most common mitigation measures currently available (i.e. bird flight diverters) appear to be effective at reducing collisions for species such as cranes.

Records of Southern Bald Ibis and Secretarybird were made during pre-application avifaunal monitoring and bird flight diverters are to be affixed to the entire length of novel overhead power lines (including the top-most / earth wires) to reduce the likelihood of collisions. It is further recommended that where multiple overhead power lines are constructed adjacent / parallel to each other, support pylons for each individual line be staggered relative to the adjacent line as far as practically possible as there is evidence that the staggering of pylon positions (rather than next to, i.e. in the mid-span) of adjacent transmission lines may reduce collisions of certain species (e.g. bustards) by ~45%. The increased visibility of the mid-span areas for avoidance may therefore be effective at reducing collisions of other species.

	Without mitigation	With mitigation
Extent	Local (3)	Local (3)
Duration	Long-term (4)	Long-term (4)
Magnitude	Low (4)	Minor (2)
Probability	Low Likelihood (2)	Low Likelihood (2)
Significance	Low (22)	Medium (18)
Status (positive or negative)	Negative	Negative
Reversibility	Partial	Partial
Irreplaceable loss of resources?	Possible	Possible
Can impacts be mitigated?	Yes	

Mitigation:

- » Pylons to be staggered (where possible) relative to adjacent pylon positions to increase the overall visibility of transmission infrastructure to avifauna;
- » Appropriate (approved) Bird flight diverters (BFDs) to be affixed to the entire length of novel overhead power lines;
- » If one or more avifaunal SCC carcasses are located and determined likely to have resulted from collisions with infrastructure in any sensitivity area over the lifespan of the facility the fatality is to be appropriately recorded and reported to an avifaunal specialist to determine the most appropriate action;
- » If double layers of fencing are required for security purposes they should be positioned at least 2 m apart to reduce the probability of entrapment by larger bodied species that may find themselves between the two fences;
- » Develop and implement a carcass search and bird activity monitoring programme in-line with the latest applicable guidelines;
- » Regular reviews of operational phase monitoring data (activity and carcass) and results to be conducted by an avifaunal specialist;
- » An operational monitoring programme for any novel overhead power lines must be implemented to locate potential collision fatalities; and
- » Any fatalities located should be reported to Birdlife South Africa (BSA) and the Endangered Wildlife Trust (EWT).

Residual Impacts:

It is unlikely that the proposed development will have a significant negative impact on the long-term viability and persistence of SCCs in the area.

Nature: Electrocution

Electrocution refers to the scenario where a bird is perched or attempts to perch on energized structures and causes an electrical short circuit by physically bridging the air gap between live components and/or live and earthed components. Overhead power line infrastructure with a capacity of 132 kV or more do not generally pose a risk of electrocution due to the large size of the clearances between the electrical infrastructure components. Electrocutions are therefore more likely for larger species whose wingspan is able to bridge the gap such as eagles or vultures. Southern Bald Ibis may attempt to perch on novel pylons, particularly in the northern and southern sections of the proposed development potentially exposing them to an increased risk of electrocution, however this behaviour is relatively easy to mitigate against through perch deterrent devices (e.g. exclusion spikes).

Mitigation measures nevertheless remain effective at reducing the potential risk of electrocution on both power lines and other energized infrastructure associated with switching stations and substations.

	Without mitigation	With mitigation
Extent	Local (2)	Local (2)
Duration	Long-term (4)	Long-term (4)
Magnitude	Minor (2)	Small (0)
Probability	Low Likelihood (2)	Improbable (1)
Significance	Low (16)	Low (6)
Status (positive or negative)	Negative	Negative
Reversibility	Yes	Yes
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Yes	
Mitigation:		
<ul style="list-style-type: none"> » All new overhead power line pylons must be of a design that minimizes electrocution risk by using adequately insulated 'bird friendly' structures, with sufficient clearances between live components to reduce the risk of electrocution; » Anti-perch devices are to be attached to all potential perches in proximity to energized infrastructure; » An operational monitoring programme for the overhead power line route must be implemented to locate potential fatalities; » Any fatalities located should be reported to Birdlife South Africa (BLSA) and the Endangered Wildlife Trust (EWT); and » Prevent birds from nesting in- or perching on substation infrastructure through exclusion covers or spikes if required (determined on a case-by-case basis). 		
Residual Impacts:		
None.		

8.5.4 Overall Result

The Avifauna Impact Assessment identified that all impacts associated with the development of the Umbila Emoyeni EGI will be of low, medium and high significance before mitigation, and can be mitigated to an acceptable level of impact (i.e., medium and low significance, depending on the impact being considered). The implementation of additional mitigation measures such as implementation of bird flappers in areas of elevated recorded passage rates will be highly effective at reducing the likelihood of collisions as large flocks of birds are easily detected.

Based on the screening study, reconnaissance study and results of the pre-application avifaunal monitoring programme conducted for the Umbila Emoyeni Renewable Energy Farm and associated infrastructure (including cumulative impacts), it is the avifaunal specialist's informed opinion that the proposed development will not have a significant negative impact on the viability or persistence of avifaunal populations (particularly avifaunal SCCs) in the area following the implementation of mitigation measures. The proposed positions of the EGI provided in the layout are acceptable. It is the specialist's opinion that

the proposed development can be approved from an avifaunal perspective and that the layout is acceptable.

8.6. Potential Impacts on Bats

Various potential impacts on bats have been identified to be associated with the development of the Umbila Emoyeni EGI. The potential impacts and the relative significance of the impacts are summarised below (refer to **Appendix G** for more details).

8.6.1 Results of the Bat Impact Assessment

Summary Pre-Construction Bat Monitoring

Pre-construction bat monitoring was undertaken over a period of 12 months for the project site. A total of 156,931 bat passes were recorded across 371 sample nights, 83 % of which were attributed to Cape serotine. Thirteen (13) percent of total activity was attributed to Egyptian free-tailed bat. The remaining four species accounted for 5 % of all activity.

Approximately 80 % of total activity was recorded at UE4 and 88 % of this activity was attributed to Cape serotine. The magnitude of activity at this location varied by species; median bat passes per night for Cape serotine at UE4 was 27.8, while for Egyptian free-tailed bat this was 0.36.

Most bat activity (98 %) was recorded by microphones at ground level (10 m) compared to at higher altitudes (60 m or 120 m). Approximately 80 % of activity at 60 m and 120 m was attributed to Egyptian free-tailed bat, with Cape serotine and Little free-tailed bat accounting for ca. 12 % and 7 % respectively. All three species were recorded across both heights. Long-tailed serotine, Yellow-bellied house bat and Natal long-fingered bat were seldomly recorded at height.

Bat Sensitivity

Bat roosting sites in the project site are relatively limited and unlikely to support large congregations of bats, with no underground sites (e.g., caves, mines, sinkholes) present. The closest known major bat roost is approximately 75km north of the project site. Although occasional ridges and rocky outcrops are features of the landscape, none are present in the project site. Bats are likely to roost in buildings associated with farmsteads within and bordering the project site, especially Cape Serotine and Egyptian Free-tailed Bat. The building inspections on site did not reveal any roosting bats but evidence (e.g., fur-oil-stained exit/entry points) suggests that bats are using these features. Trees growing at these farmsteads and elsewhere on site where they form clumps could also provide roosting spaces for bats.

Sensitive features within the project site at which bat foraging activity may be concentrated include farm buildings (and within built up areas for some species) where they would forage for insects attracted to lighting, dams and wetland areas, within and along the edge of woodland/tree patches, and over cultivated areas (refer to **Figure 8.5** and **Table 8.1**).

Table 8.1: Features used to assign spatial risk categories in the project site for bats

Risk Level		
Low	Medium	No-Go
Heavily modified land	CBA Optimal	Farm Dams

Risk Level		
Low	Medium	No-Go
Moderately modified land	ESA Landscape corridor	Wetlands
	ESA Local corridor	Trees
	Other Natural Areas	Buildings
		Rivers/Streams
		Wetlands
		CBA Irreplaceable Areas

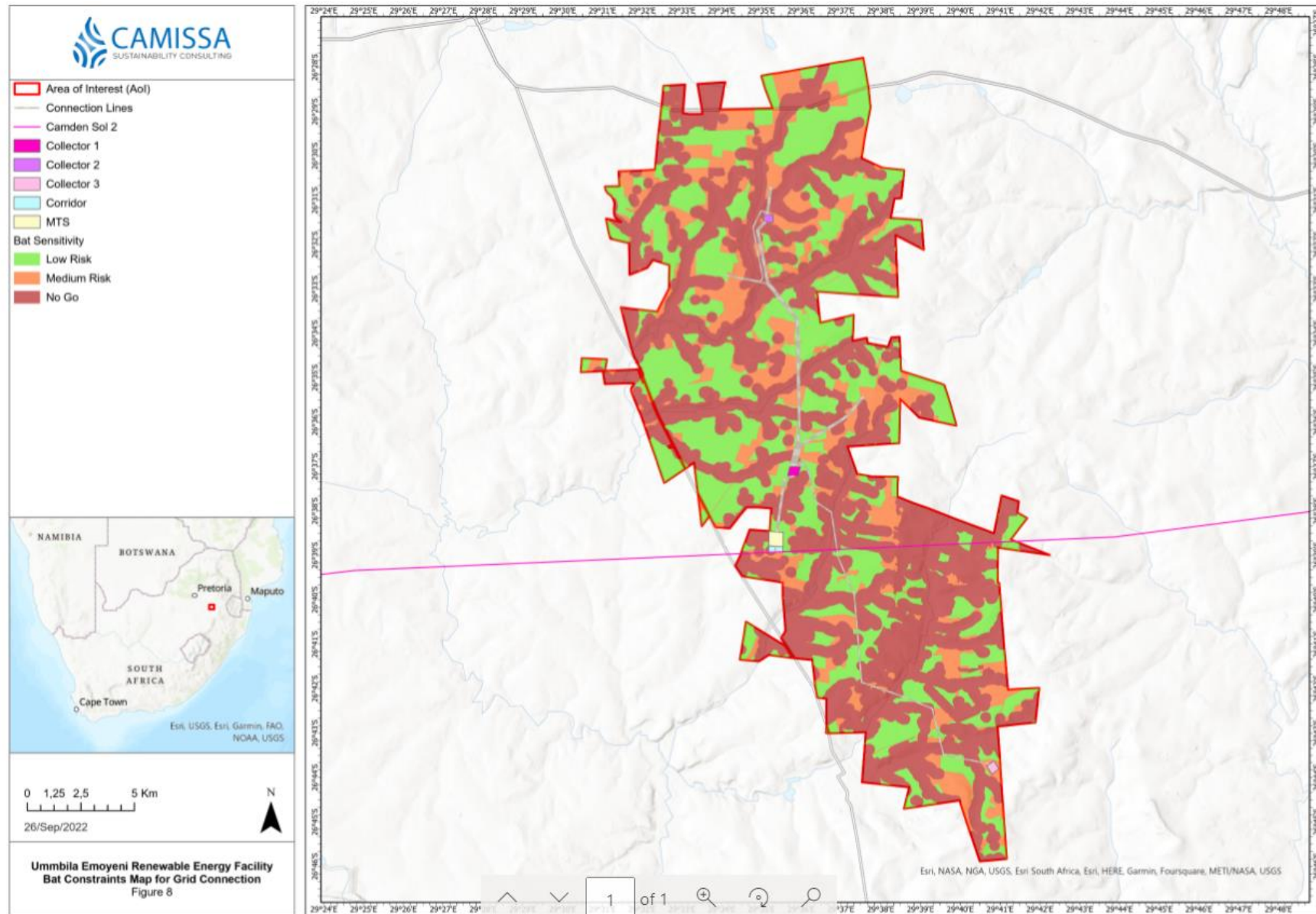


Figure 8.6: Bat constraints overlain on the layout for the Umbila Emoyeni EGI

8.6.2 Description of Bat Impacts

Grid connection infrastructure impact bats directly because bats collide with these lines, and indirectly through the modification of habitats, including disturbance or destruction of roosting, foraging and commuting spaces. The potential impacts to bats as a result of construction and operation activities include the following:

- » Modification of bat foraging/commuting habitat.
- » Destruction of/Disturbance to bat roosts.
- » Bat mortality.
- » Disturbance to bats.

8.6.3 Impact tables summarising the significance of impacts on bats during the construction, operation and decommissioning phases (with and without mitigation)

Construction Phase Impacts

Nature: <i>Modification of bat habitat (roosting, foraging, commuting)</i>		
Vegetation clearing for grid connection infrastructure (access roads, substation buildings, pylons), as well as noise and dust generated during the construction phase, will impact bats by removing habitat used for foraging and commuting, through disturbance, and displacement. This impact is likely to have species specific effects; clutter edge species (e.g., Cape serotine) are more likely to be impacted by habitat modification given their greater association with physical habitat features compared to high-flying species (e.g., Egyptian free-tailed bat).		
Construction of grid connection infrastructure could result in destruction (direct impact) of bat roosts (trees, buildings) and disturbance (indirect impact) of bat roosts potentially resulting in roost abandonment. Bat mortality can occur if roosts which contain bats are destroyed. Installation of new infrastructure in the landscape (e.g., buildings, road culverts) can inadvertently provide new roosting spaces for some bat species potentially increasing the likelihood of collisions.		
	Without mitigation	With mitigation
Extent	Site (1) - The impact will be limited to the site of development.	Site (1) - Even with mitigation, the impact will still occur across the same extent hence there is no reduction in the quantified effect.
Duration	Short-term (2) - The impact will persist for the duration of the construction period, but displacement could persist for the duration of operation.	Short-term (2) - Even with mitigation, the impact will still occur for the same duration hence there is no reduction in the quantified effect.
Magnitude	Low (4) - Given the limited habitat modification relative to remaining habitat this impact is likely to only cause a slight impact on processes as bats will find alternative habitat. Roosts are critical for bat life history thus impacts to roosts could impact on ecological processes. However, no major confirmed roosts have been found within the project site and hence it is unlikely this impact will have a high magnitude.	Low (3) - The application of the mitigation measures may lower the magnitude of impact but not remove it completely.

Probability	Improbable (2) - The application of the mitigation measures may lower the probability of impact but not remove it completely.	Very Improbable (1)- The application of the mitigation measures may lower the probability of impact but not remove it completely. Since no confirmed roosts have been located, no buildings will be destroyed, and potential roosting spaces are buffered by 200m, it is unlikely that this impact will occur.
Significance	Low (14)	Low (6)
Status (positive or negative)	Negative	Negative
Reversibility	Yes	Yes
Irreplaceable loss of resources?	Yes	Yes
Can impacts be mitigated?	Yes	
<p>Mitigation:</p> <p><u>Avoid:</u></p> <ul style="list-style-type: none"> » Limit potential for bats to roost in project infrastructure (e.g., buildings, road culverts) by ensuring they are properly sealed such that bats cannot gain access. » No construction activities at night. » No construction activities at night, no placement of pylons within 200 m of key habitat features specifically including tree clumps, buildings, dams/wetlands, and rivers/streams. The OHL itself is permitted to cross over No-Go Areas for practical routing reasons but pylon positions must avoid No-Go Areas. The construction compounds, laydown areas, and batching plants must also avoid No-Go areas. Therefore, the maximum possible span should be implemented to avoid the sensitive area while ensuring the technical feasibility of the development. The construction compounds, laydown areas, and batching plants must also avoid No-Go areas <p><u>Minimise:</u></p> <ul style="list-style-type: none"> » Minimise clearing of vegetation, minimise disturbance and destruction of farm buildings on site, minimise removal of trees, and where this is required, these features should be examined for roosting bats. This study assumes that all buildings and trees are potentially roosts and must be buffered by 200m since numerous species use these features for roosting. » Apply good construction abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during construction. <p><u>Restore:</u></p> <ul style="list-style-type: none"> » Rehabilitate all areas disturbed during construction, (including aquatic habitat). 		
<p>Residual Impacts:</p> <p>After the application of the mitigation measures, the residual impact of habitat modification should be relatively low because the amount of habitat lost will be low compared to remaining habitat for bats in the project site. Further, the application of buffers to key bat habitats should limit the impact of habitat loss, displacement and disturbance since some bat species (e.g., Cape serotine) would still be able to access favourable spaces (e.g., commuting along drainage networks which are buffered) and bat can still forage among solar panels.</p> <p>Despite undertaking roost surveys, no roosting bats were discovered but it is highly likely bats are roosting in buildings within the Area of Interest since other roosting spaces are limited. Undiscovered roosts in unbuffered areas may be unknowingly destroyed during construction.</p>		

Operation Phase Impacts

Nature: Light Pollution

<p>Construction of grid infrastructure will increase ecological light pollution from artificial lighting associated with the substation and other operational and maintenance buildings. Light pollution can alter ecological dynamics. Lighting attracts and can cause direct mortality of insects, reducing the prey base for bats, especially bat species that are light-phobic. These species may also be displaced from previous foraging areas due to lighting. Other bat species forage around lights, attracted by higher numbers of insects. This may bring these species into the vicinity of the project and indirectly increase the risk of collision with wind turbines.</p>		
	Without mitigation	With mitigation
Extent	Local (2) - The impact will be limited to the site of development, but sky glow can occur beyond the site depending on the scale and intensity of lighting used.	Site (1) - With mitigation, sky glow can possibly be reduced to the site.
Duration	Long term (4) - The impact will persist for the duration of the operation of the grid infrastructure	Long term (4) - The impact will persist for the duration of the operation of the grid infrastructure
Magnitude	Low (5) - Light pollution is an understudied impact, but it is likely that ecological processes may be disturbed. However, given the small scale of lighting that will be used at the project, the magnitude is predicted to be low.	Low (3) - The application of the mitigation measures may lower the magnitude of impact but not remove it completely.
Probability	Highly Probable (4) - Effects of light pollution have been demonstrated for bats, thus it is probable that the impact will occur.	Improbable (2) - The application of the mitigation measures may lower the probability of impact but not remove it completely.
Significance	Medium (44)	Low (16)
Status (positive or negative)	Negative	Negative
Reversibility	No	No
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Yes	
<p>Mitigation: <u>Avoid:</u> No placement of substations and operational and maintenance buildings within 200 m of key habitat features specifically including tree clumps, buildings, dams/wetlands, and rivers/streams <u>Minimise:</u> » Use as little lighting as possible, maximise use of motion-sensor lighting, avoid sky-glow by using hoods, increase spacing between lighting units, and use low pressure sodium lights</p>		
<p>Residual Impacts: Residual impacts of ecological light pollution are likely to be low and acceptable since the recommended mitigation measures have been shown to be effective for bats. However, unintended ecosystem effects could still occur because of the disrupted ecological dynamics</p>		

Decommissioning Phase Impacts

<p>Nature: <u>Modification of Bat Habitat</u></p>		
<p>Impacts during the decommissioning phase will be indirect and involve disturbance to bats through excessive noise and dust, and damage to vegetation.</p>		
	Without mitigation	With mitigation

Extent	Site (1) - The impact will be limited to the site of development.	Site (1) - Even with mitigation, the impact will still occur for the same duration hence there is no reduction in the quantified effect.
Duration	Short-term (2) - The impact will persist for the duration of the decommissioning phase.	Short-term (2) - Even with mitigation, the impact will still occur for the same duration hence there is no reduction in the quantified effect.
Magnitude	Minor (3) - Given the limited habitat modification relative to remaining habitat this impact is likely to only cause a slight impact on processes as bats will find alternative habitat. Most decommissioning activities will take place during daylight hours when bats are not active, lessening the impact magnitude.	Minor (2) - The application of the mitigation measures will likely result in limited impacts to bats.
Probability	Improbable (2) - Decommissioning activities will probably not impact bats.	Very Improbable (1) - Decommissioning activities are very unlikely to impact bats with mitigation.
Significance	Low (12)	Low (5)
Status (positive or negative)	Negative	Negative
Reversibility	Yes	Yes
Irreplaceable loss of resources?	Yes	Yes
Can impacts be mitigated?	Yes	
Mitigation:		
<u>Avoid:</u>		
» No decommissioning activities at night.		
<u>Minimise:</u>		
» Apply good abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during decommissioning.		
<u>Restore:</u>		
» Rehabilitate all areas disturbed during throughout the operation of the grid connection infrastructure (including aquatic habitat).		
Residual Impacts:		
There are unlikely to be major residual impacts because of decommissioning activities on site provided habitat restoration is implemented successfully.		

8.6.4 Overall Result

Based on the bat activity recorded at the site proposed for the Umbila Emoyeni EGI, the significance ratings for the majority of the impacts to bats posed by the development are predicted to be low and medium significance before mitigation. After mitigation, all impacts are predicted to be low. Based on the opportunity for reduction of the impacts through appropriate mitigation measures from a medium significance to a low, acceptable significance, no fatal flaws are expected to occur. Provided the recommended mitigation measures are adhered to, it is the specialist's opinion that the project assessed can be approved.

8.7. Assessment of Impacts on Soils Agricultural Potential

Various impacts have been identified with the development of the Umbila Emoyeni EGI from an agricultural perspective. The potential impacts and the relative significance of the impacts are summarised below (refer to **Appendix H** for more details).

8.7.1 Results of the Soils and Agricultural Potential Assessment

Four main sensitive soil forms were identified within the project site, namely the Vaalbos, Avalon, Ermelo and Tukulu soil forms. The land capability sensitivity (DAFF, 2017) indicates a range of sensitivities expected throughout the project site, which predominantly covers “Low” to “Moderate” sensitivities. Smaller patches are characterised by sensitivities up to “Moderately High” (refer to **Figure 8.7**). Furthermore, various crop field boundaries were identified by means of the DFFE Screening Tool (2022), which are predominantly characterised by “High” sensitivities with one area being classified as “Very High” sensitivity (Refer to **Figure 8.8**).

The specialist has recommended that such high potential crop fields be avoided by throughout the life of the operation. If avoidance is not feasible, stakeholder engagement must be undertaken to compensate landowners for high crop field land use areas where necessary. In a case where relocating the project infrastructure is not feasible, the developer should engage with the owners of the crop fields for an appropriate compensation.

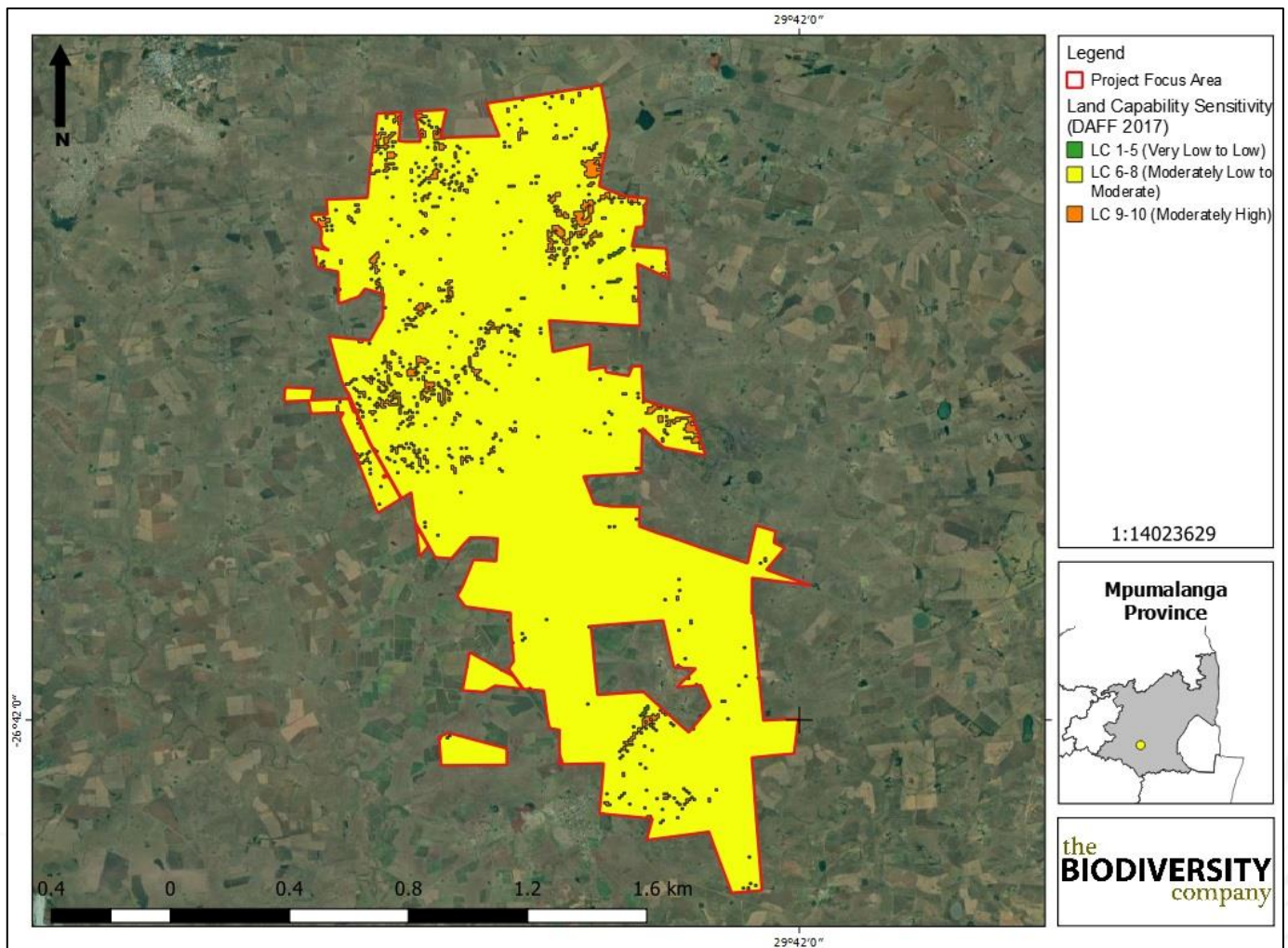


Figure 8.7: Land sensitivity capability for the project site (DAFF, 2017)

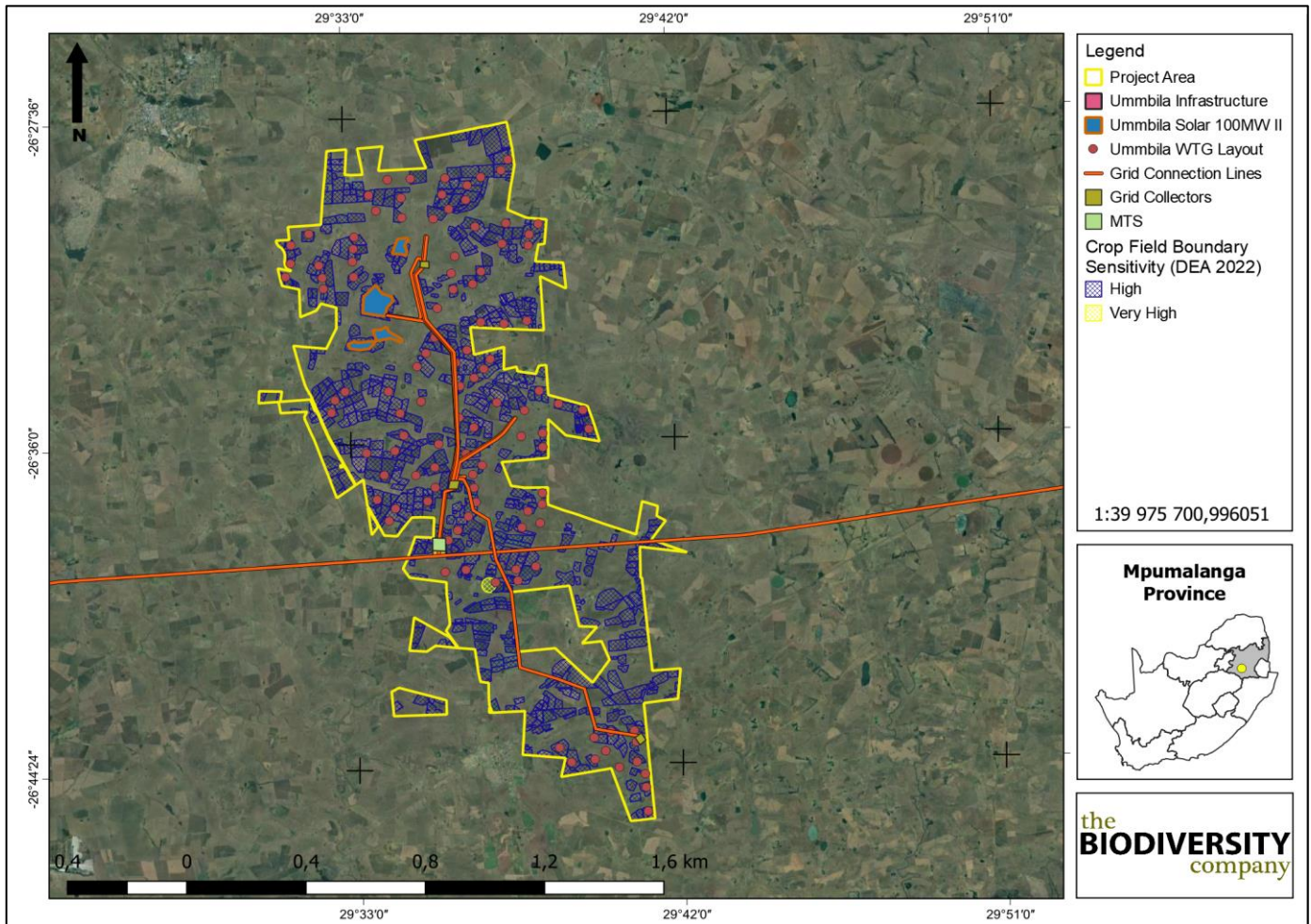


Figure 8.8: Project infrastructure in relation to the sensitive crop fields

8.7.2 Description of Impacts on Soils and Agricultural Potential

The impact assessment considered the calculated sensitivities associated with the soil resources expected to be impacted upon by the relevant components. This impact assessment purely focused on the impacts expected towards natural resources (in specific, the soil and associated land capability).

8.7.3 Impact tables summarising the significance of impacts on soils and agricultural potential during the construction, operation and decommissioning phases (with and without mitigation)

Construction Phase Impacts

Nature: Loss of land capability

The proposed grid connection and associated infrastructure will include activities as topsoil stripping, stockpiling, installation of relevant cables, construction of various substations and pylons will occur. Some of the infrastructure will be located in areas with high crop sensitivity, even though the effect to the land capability is minimal. Only the disturbed routes and areas will be exposed to soil erosion and compaction may occur when the vegetation is cleared.

	Without mitigation	With mitigation
Extent	Site (1)	Site (1)
Duration	Short Term (2)	Very Short Term (1)

Magnitude	Minor (2)	Minor (2)
Probability	Probable (3)	Improbable (2)
Significance	Low (24)	Low (8)
Status (positive or negative)	Negative	Negative
Reversibility	High	High
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Yes	
Mitigation:		
<p>Limited mitigation is required given the fact that the pre- mitigation significance rating has been scored as “Low – Negative” and the post- mitigation significance rating being scored as “Low – Negative”. The following specific measures are intended to secure a low residual risk:</p> <ul style="list-style-type: none"> » Avoidance of all high agricultural production land and other actively cultivated areas. Where avoidance is not feasible, stakeholder engagement should occur to compensate affected landowners. » Make use of existing roads or upgrades tracks before new roads are constructed. The number and width of internal access routes must be kept to a minimum. » A stormwater management plan must be implemented for the development. The plan must provide input into the road network and management measures. » Substations foundation and pylons placement must be (preferably) located in already disturbed areas that are not actively cultivated; and » Rehabilitation of the area must be initiated from the onset of the project. Soil stripped from infrastructure placement can be used for rehabilitation efforts. » An alien invasive plant species and control programme must be implemented from the onset of the project. 		
Residual Impacts:		
<p>Limited residual impacts will be associated with these activities, assuming that all prescribed mitigation measures be strictly adhered to.</p>		

Operation Phase Impacts

Nature: <u>Loss of land capability</u>		
<p>During the operational phase, limited and negligible impacts are foreseen. Concrete areas will be equipped with drains and revegetated to reduce soil erosion on exposed areas. Maintenance of the grid connection will have to be carried out throughout the life of the project. It is expected that these maintenance practices can be undertaken by means of manual labour.</p> <p>The operational phase of the grid connection will only include maintenance activities with professionals. Besides compaction and erosion caused by traffic along access routes, few aspects are expected to be associated with this phase. The spread of alien invasive species will be a risk, predominantly adjacent to developed areas (edge effect).</p>		
	Without mitigation	With mitigation
Extent	Site (1)	Site (1)
Duration	Short Term (2)	Very short Term (1)
Magnitude	Minor (2)	Minor (2)
Probability	Probable (3)	Improbable (2)
Significance	Low (15)	Low (8)
Status (positive or negative)	Negative	Negative
Reversibility	High	High
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Yes	
Mitigation:		
<p>Limited mitigation is required given the fact that the pre- mitigation significance rating has been scored as “Low– Negative” and the post- mitigation significance rating being scored as “Low – Negative”. Further general mitigation is however detailed as the impacts are low.</p> <ul style="list-style-type: none"> » Only the proposed access area and roads should be disturbed to reduce any unnecessary compaction. 		

- » Prevent any spills from occurring. Machines must be parked within hard park areas and must be checked daily for fluid leaks.
- » All excess soil (soil that are stripped and stockpiled to make way for foundations) must be stored, continuously rehabilitated to be used for rehabilitation of eroded areas.
- » If a spill occurs, it is to be cleaned up immediately and reported to the appropriate authorities.

Residual Impacts:

Limited residual impacts will be associated with these activities, assuming that all prescribed mitigation measures be strictly adhered to.

Decommissioning Phase Impacts

No significant impacts are identified for the decommissioning phase. However, the following generation mitigation measures have been detailed for the decommissioning phase:

- » Restore vegetation cover by means of revegetating indigenous grass species. Mixed stands or monocultures will work sufficiently for revegetation purposes. Mixed stands tend to blend in with indigenous vegetation species and are more natural. Monocultures however could achieve high productivity. In general, indigenous vegetation should always be preferred due to various reasons including the aesthetical presence thereof as well as the ability of the species to adapt to its surroundings.
- » All areas outside of the footprint areas that will be degraded (by means of vehicles, laydown yards etc.) must be ripped where compaction has taken place. According to the Department of Primary Industries and Regional Development, ripping tines must penetrate to just below the compacted horizons (approximately 300 – 400mm) with soil moisture being imminent to the success of ripping. Ripping must take place within 1-3 days after seeding, and also following a rain event to ensure a higher moisture content. To summarise:
 - * Rip all compacted areas outside of the developed areas that have been compacted.
 - * This must be done by means of a commercial ripper that has at least two rows of tines.
- » Ripping must take place between 1 and 3 days after seeding and following a rainfall event (seeding must therefore be carried out directly after a rainfall event). Plant phase plants which are characterised by fast growing and rapid spreading conditions. Seed germination, seed density and seed size are key aspects to consider before implementing revegetation activities. The number of seed should be limited to ensure that competition between plants is kept to a minimum. During the establishment of seed density, the percentage of seed germination should be taken into consideration. *E. curvula* is one of the species recommended due to the ease of which it germinates. This species is also easily sown by means of hand propagation and hydro seeding. The following species are recommended for rehabilitation purposes:
 - * *Eragrostis teff*;
 - * *Cynodon species (Indigenous and altered types)*;
 - * *Chloris gayana*;
 - * *Panicum maximum*;
 - * *Digitaria eriantha*;
 - * *Anthephora pubescens*; and
 - * *Cenchrus ciliaris*.

8.7.4 Overall Result

The Soils and Agricultural Potential Impact Assessment identified that all impacts associated with the development of the Umbila Emoyeni EGI will be of low significance before mitigation, and can be mitigated

to an impact level of low significance. It is the specialist's opinion that the proposed development will have an overall low residual impact on the agricultural production ability of the land.

8.8. Assessment of Impacts on Heritage Resources (including archaeology, palaeontology and cultural landscape)

Potential impacts on heritage resources and the relative significance of the impacts associated with the development of the Umbila Emoyeni EGI are summarised below (refer to **Appendix I**).

8.8.1 Results of the Heritage Impact Assessment

Archaeology

The field assessment has determined that the area proposed for development has medium to high local historic significance. The broader cultural landscape consists of old farmhouses, kraals, circular stone structures, and the remnants of old water pumps, feeding and water troughs.

Even though the area is rich in history, no significant archaeological heritage resources were identified during the field assessment. No Stone Age or Iron Age heritage resources were identified during the survey. The few heritage resources that were identified consist of the ruins of older farm structures and kraals. Due to the paucity of older farm structures in the area as a result of demolition, it is recommended that the identified ruins and kraals remain untouched and that a safety buffer should exist around all such structures.

The field assessment identified six burial grounds or graves close to or within the proposed development footprint. All graves are of high local significance as a result of their social and cultural value, and are therefore graded IIIA.

Palaeontology

The area proposed for development is underlain by Permian aged sandstone and shale of the Vryheid Formation, Jurassic aged dolerite and quaternary aged alluvium with a very high, very low, and moderate palaeontological sensitivity. Significant fossils are expected in areas where deep excavations (>1.5m) are planned in areas indicated in red on the palaeontological sensitivity map (refer to **Figure 8.9**). It should be noted however that these areas are not regarded as no-go areas for development. The specialist has however recommended the implementation of a chance find procedure in the event that fossils are discovered during excavating activities.

Deep weathering and extensive agricultural disturbance prevented the recording of fossils over most of the inspected areas, but it is significant to note that in the few places where exposures were noticed, highly significant fossils were recorded. In areas underlain by the Vryheid Formation, the field investigation confirmed the potential for the presence of fossils, and most of the important fossil structures were recorded.

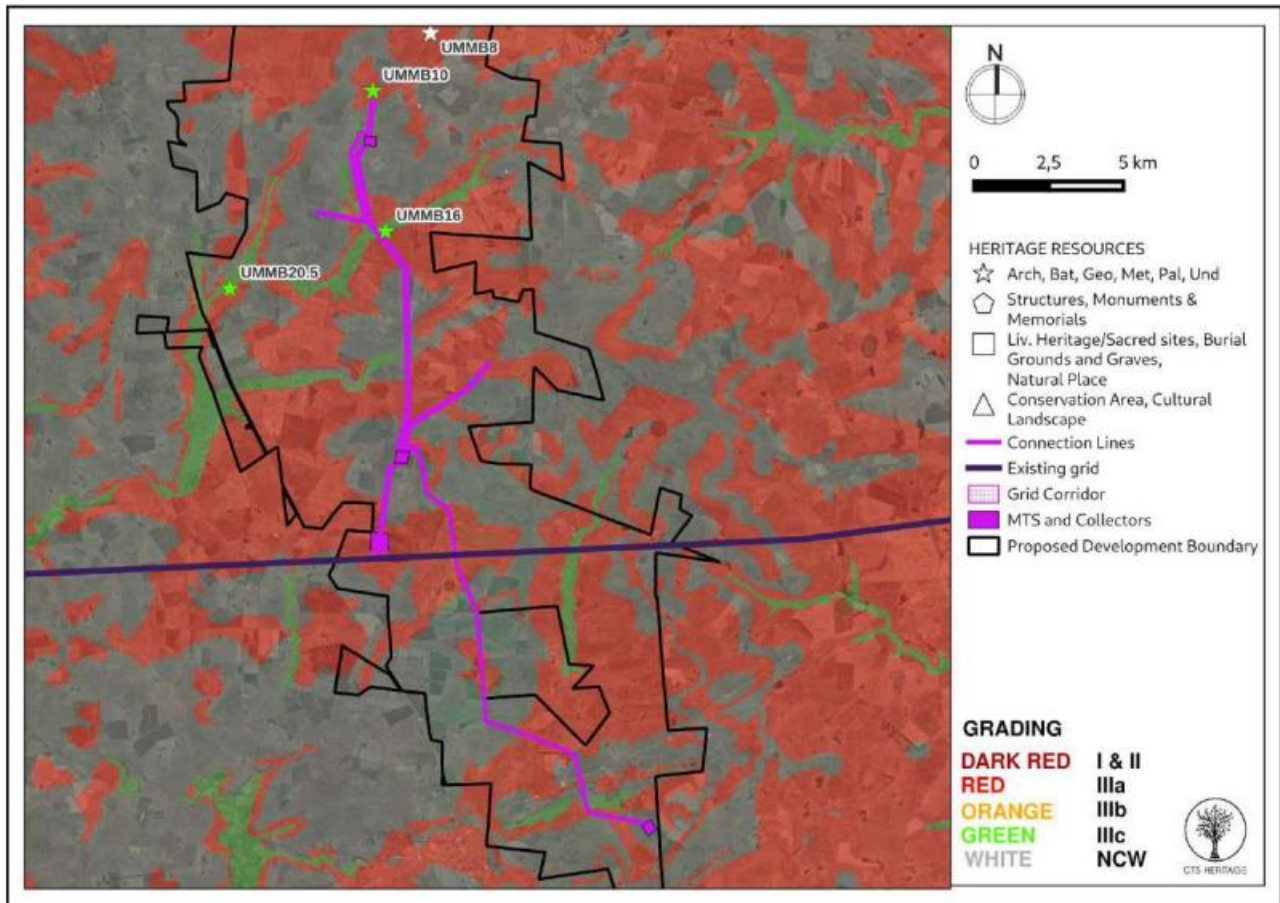


Figure 8.9: Map showing the palaeontological sensitivity of the site and palaeontological heritage resources identified within the project site (northern section)

Cultural Landscape

Possible receptors within the landscape which could be sensitive to landscape change have been identified and include the towns of Bethal and Morgenzon; the Silver Water and Rievlei Nature Reserves; local farmsteads and homesteads; and the N17, R35, R38, R39 and unsurfaced local roads.

The N17 that runs through the northern section of the development area marks the primary approach from Ermelo (established in the 1870's) to Bethal (established in the 1880's) and as such, the area proposed for development provides a significant gateway between these two historic towns. As with most National Routes, the alignment of the N17 follows the old regional route of the R29 which itself is likely based on historic routes between these significant towns. The way that the local farmsteads and roads interact with each other and elements of the landscape such as topography and river courses etc. all act as contributing elements to the cultural landscape. These elements are mapped in **Figure 8.10** below.

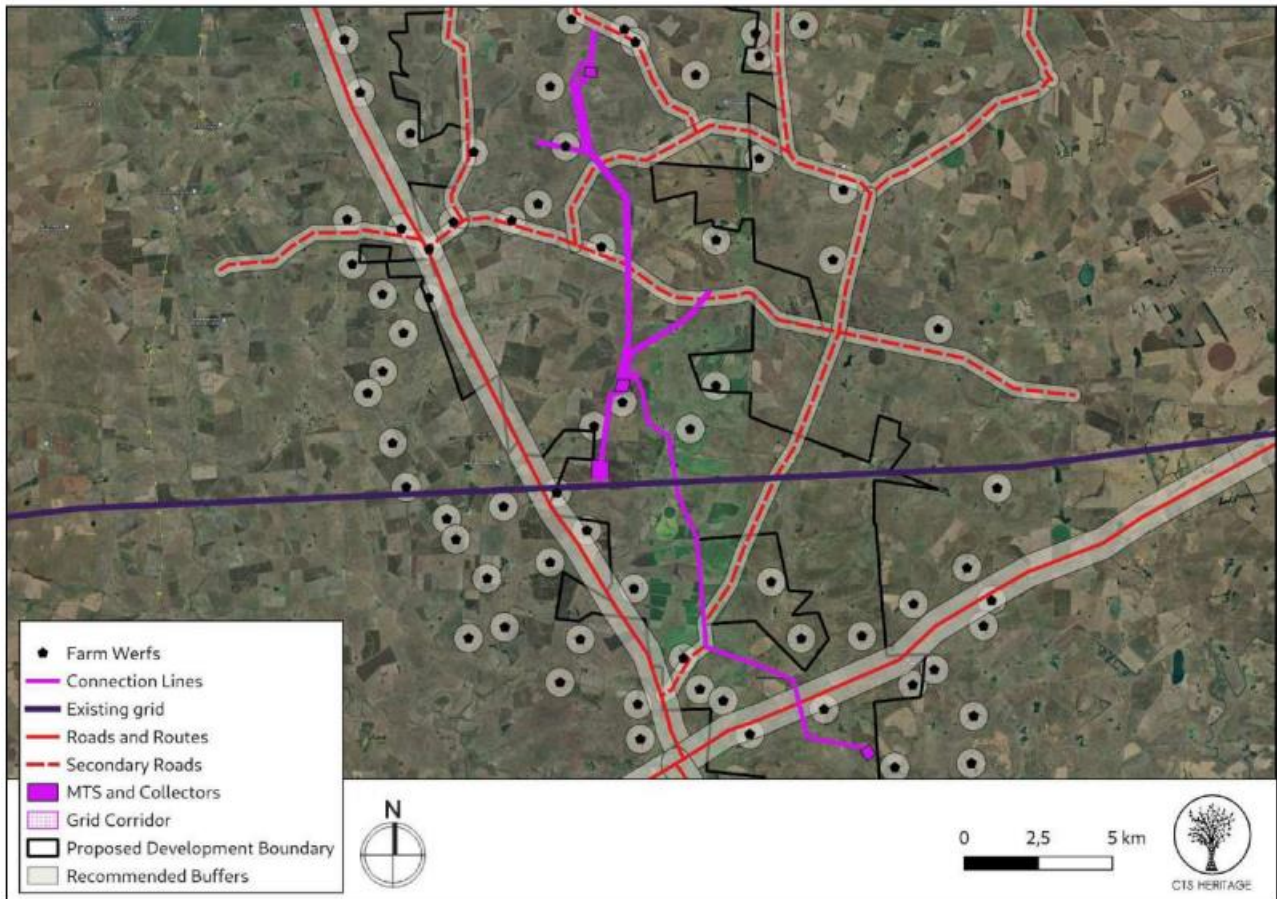


Figure 8.10: Cultural landscape features identified within the northern section of the project site

8.8.2 Description of the Heritage Impacts

The following impacts are expected from a heritage perspective:

- » Destruction of archaeological heritage.
- » Destruction of palaeontological heritage.
- » Negative impact to significant cultural landscapes.

8.8.3 Impact tables summarising the significance of impacts on heritage during construction, operation and decommissioning (with and without mitigation)

Construction Phase Impacts

Archaeology

Nature: *Impact to archaeological heritage resources*

The area proposed for development is known to conserve heritage resources of archaeological significance that may be impacted by the proposed development.

	Without mitigation	With mitigation
Extent	Site (1) - Localised within the site boundary	Site (1) - Localised within the site boundary
Duration	Permanent (5) - Where manifest, the impact will be permanent	Permanent (5) - Where manifest, the impact will be permanent

Magnitude	High (8) - Some significant archaeological resources were identified within the development area	High (8) - Some significant archaeological resources were identified within the development area
Probability	Highly Probable (4) - It is possible that any significant archaeological resources will be impacted	Very Improbable (1) - It is extremely unlikely that any significant archaeological resources will be impacted
Significance	Medium (56)	Low (14)
Status (positive or negative)	Negative	Negative
Reversibility	Any impacts to heritage resources that do occur are irreversible	Any impacts to heritage resources that do occur are irreversible
Irreplaceable loss of resources?	Unlikely	Unlikely
Can impacts be mitigated?	Yes	
Mitigation:		
<ul style="list-style-type: none"> » A 50m no-go development buffer is implemented around all burial ground sites including Observations 001, 005, 006, 008, 012 and 013. » A Management Plan for the ongoing conservation of these burials is developed prior to construction, along with a Guide on how to identify marked and unmarked burials and how to proceed should previously unidentified burials be uncovered during the construction process. » Excavations associated with the foundations of the proposed collector substation must be monitored by an archaeologist. » The proposed collector substation be moved approximately 100m further south, away from the identified burial ground at Observation 005 » 		
Residual Impacts:		
Should any significant archaeological resources be impacted (however unlikely) residual impacts may occur, including a negative impact due to the loss of potentially scientific cultural resources.		

Palaeontology

Nature: <i>Impact to palaeontological heritage resources</i>		
The area proposed for development is known to conserve heritage resources of palaeontological significance that may be impacted by the proposed development.		
	Without mitigation	With mitigation
Extent	Site (1) - Localised within the site boundary	Site (1) - Localised within the site boundary
Duration	Permanent (5) - Where manifest, the impact will be permanent	Permanent (5) - Where manifest, the impact will be permanent
Magnitude	High (8) - No highly significant palaeontological resources were identified within the development area; however, the geology underlying the development area is very sensitive for impacts to significant fossils	High (8) - No highly significant palaeontological resources were identified within the development area; however, the geology underlying the development area is very sensitive for impacts to significant fossils
Probability	Definite (5) - It is extremely likely that significant palaeontological resources will be negatively impacted	Low (1) - It is extremely unlikely that any significant paleontological resources will be negatively impacted
Significance	High (70)	Low (14)

Status (positive or negative)	Negative	Negative
Reversibility	Any impacts to heritage resources that do occur are irreversible	Any impacts to heritage resources that do occur are irreversible
Irreplaceable loss of resources?	Likely	Unlikely
Can impacts be mitigated?	Yes	
<p>Mitigation:</p> <ul style="list-style-type: none"> » The Chance Fossil Finds Procedure must be implemented for the duration of construction activities: <ul style="list-style-type: none"> ○ Training: <ul style="list-style-type: none"> * Workmen and foremen need to be trained in the procedure to follow in instances of accidental discovery of fossil material, in a similar way to the Health and Safety protocol. A brief introduction to the process to follow in the event of possible accidental discovery of fossils should be conducted by the designated Environmental Control Officer (ECO) for the project, or the foreman or site agent in the absence of the ECO. It is recommended that copies of the attached poster and procedure are printed out and displayed at the site office so that workmen may familiarise themselves with them and are thereby prepared in the event that accidental discovery of fossil material takes place. ○ Actions to be undertaken: <ul style="list-style-type: none"> * One person in the staff must be identified and appointed as responsible for the implementation of the protocol in instances of accidental fossil discovery and must report to the ECO or site agent. If the ECO or site agent is not present on site, then the responsible person on site should follow the protocol correctly in order to not jeopardize the conservation and well-being of the fossil material. * Once a workman notices possible fossil material, he/she should report this to the ECO or site agent. Procedure to follow if it is likely that the material identified is a fossil: <ul style="list-style-type: none"> - The ECO or site agent must ensure that all work ceases immediately in the vicinity of the area where the fossil or fossils have been found. - The ECO or site agent must inform SAHRA of the find immediately. This information must include photographs of the findings and GPS co-ordinates. - The ECO or site agent must compile a Preliminary Report and fill in the attached Fossil Discoveries: Preliminary Record Form within 24 hours without removing the fossil from its original position. The Preliminary Report records basic information about the find including: <ul style="list-style-type: none"> ❖ The date. ❖ A description of the discovery. ❖ A description of the fossil and its extent (e.g., position and depth of find). ❖ Where and how the find has been stored. ❖ Photographs to accompany the preliminary report: (<ul style="list-style-type: none"> ✓ A scale must be used. ✓ Photos of location from several angles. ✓ Photos of vertical section should be provided. ✓ Digital images of hole showing vertical section (side). ✓ Digital images of fossil or fossils. » Upon receipt of this Preliminary Report, SAHRA will inform the ECO or site agent whether or not a rescue excavation or rescue collection by a palaeontologist is necessary. * Exposed finds must be stabilised where they are unstable and the site capped, e.g. with a plastic sheet or sand bags. This protection should allow for the later excavation of the finds with due scientific care and diligence. SAHRA can advise on the most appropriate method for stabilisation. * If the find cannot be stabilised, the fossil may be collected with extreme care by the ECO or the site agent and put aside and protected until SAHRA advises on further action. Finds collected in this way must be safely and securely stored in tissue paper and an appropriate box. Care must be taken to remove the all fossil material and any breakage of fossil material must be avoided at all costs. * No work may continue in the vicinity of the find until SAHRA has indicated, in writing, that it is appropriate to proceed. 		
Residual Impacts:		

Should any significant palaeontological resources be impacted (however unlikely) residual impacts may occur, including a negative impact due to the loss of potentially scientific cultural resources

Cultural Landscape

Nature: *Impact to cultural landscape*

The broader context of the area proposed for development has cultural significance that may be impacted by the proposed development.

	Without mitigation	With mitigation
Extent	Regional (5)	Regional (5)
Duration	Long-term (4) - Where manifest, the impact will be long term – for the duration of the grid connection infrastructure lifetime	Long-term (4) - Where manifest, the impact will be long term – for the duration of the grid connection infrastructure lifetime
Magnitude	Medium (7) - While the cultural value of the development area is moderate, the location of the proposed grid connection infrastructure means that impact to the cultural landscape is likely to result from the proposed development.	Medium (7) - While the cultural value of the development area is moderate, the location of the proposed grid connection infrastructure means that impact to the cultural landscape is likely to result from the proposed development
Probability	Definite (5) - It is extremely likely that significant palaeontological resources will be negatively impacted	Low (1) - It is extremely unlikely that any significant paleontological resources will be negatively impacted
Significance	High (80)	Low (16)
Status (positive or negative)	Negative	Negative
Reversibility	Any impacts to heritage resources that do occur are reversible once the grid infrastructure is removed	Any impacts to heritage resources that do occur are reversible once the grid infrastructure is removed
Irreplaceable loss of resources?	Unlikely	Unlikely
Can impacts be mitigated?	Yes	
Mitigation:		
<ul style="list-style-type: none"> » A 500m no development buffer should be implemented on either side of the N17, R35 and R39. » A 200m no development buffer should be implemented on either side of the secondary routes that run through the development area. » A 500m no development buffer must be implemented around the identified farm werfs. 		
Residual Impacts:		
N/A		

8.8.4 Overall Result

The Heritage Impact Assessment identified that all impacts associated with the development of the Umbila Emoyeni EGI will be of medium and high significance before mitigation, and can be mitigated to an acceptable level of impact (i.e., low significance). The impacts rated to be of high significance pre-mitigation are not considered as fatal flaws, provided the prescribed mitigation measures are implemented.

According to the Heritage Impact Assessment, the proposed landscape is relatively typical of the region and is not protected." However, the nature of the relationship between various landscape elements such as the farm werfs and road network contributes to the sense of place of this rural landscape.

Even though the area is rich in history, no significant archaeological heritage resources were identified during the field assessment. No Stone Age or Iron Age heritage resources were identified during the survey. The few heritage resources that were identified consist of the ruins of older farm structures and kraals. Due to the paucity of older farm structures in the area as a result of demolition, it is recommended that the identified ruins and kraals remain untouched and that a safety buffer should exist around all such structures. The field assessment identified six burial grounds or graves close to or within the proposed development footprint of the project area. All graves are of high local significance as a result of their social and cultural value, and are therefore graded IIIA.

No palaeontological no-go areas have been identified within the project areas. With the exception of one fossil site of low scientific value, none of the recorded fossil sites overlaps directly with, or lies close to (< 20 m) the proposed infrastructure and no modification of the layouts through micro-siting is proposed here on palaeontological grounds.

Based on the outcomes of the Heritage Impact Assessment, it is not anticipated that the proposed development of the grid connection infrastructure will negatively impact on significant heritage resources on condition that:

- » A 500m no development buffer should be implemented on either side of the N17, R35 and R39.
- » A 200m no development buffer should be implemented on either side of the secondary routes that run through the development area.
- » A 500m no development buffer must be implemented around the identified farm werfs.
- » A 50m no-go development buffer is implemented around all burial ground sites including Observations 001, 005, 006, 008, 012 and 013.
- » A Management Plan for the ongoing conservation of these burials is developed prior to construction, along with a Guide on how to identify marked and unmarked burials and how to proceed should previously unidentified burials be uncovered during the construction process.
- » Excavations associated with the foundations of the proposed collector substation must be monitored by an archaeologist
- » The proposed collector substation must be moved approximately 100m further south, away from the identified burial ground at Observation 005
- » The Chance Fossil Finds Procedure must be strictly adhered to for excavations exceeding 1.5m located within the Vryheid Formation.
- » Although all possible care has been taken to identify sites of cultural importance during the investigation of the study area, it is always possible that hidden or subsurface sites could be overlooked during the assessment. If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils, burials or other categories of heritage resources are found during the proposed
- » development, work must cease in the vicinity of the find and SAHRA must be alerted immediately to determine an appropriate way forward.

8.9. Assessment of Visual Impacts

Negative impacts on visual receptors will occur during the undertaking of construction activities and the operation of the Umbila Emoyeni EGI. Potential impacts and the relative significance of the impacts are summarised below (refer to **Appendix J**).

8.9.1 Results of the Visual Impact Assessment

Site Sensitivity

The following sensitivities have been identified from a visual perspective (refer to **Figure 8.11**):

- » Highly sensitive areas include:
 - * Areas immediately surrounding settlement and homesteads development of which is likely to significantly change the character of views for residents. A 1000m buffer is proposed which should be sufficient to ensure that development does not totally dominate views. It is possible that receptors (owners /residents) have no concern regarding the development of these areas, in which case the sensitivity rating will reduce.
 - * Areas on and immediately beside ridgelines as the development of these areas is likely to be more visible to surrounding areas including protected areas. A 1000m buffer is proposed; and
 - * Corridors beside the main roads that could be affected including the N17, the R35, and the R39. This is deemed sensitive because development in this corridor is likely to be highly obvious to people travelling along the roads the proposed 500m corridor should be sufficient to ensure that development does not totally dominate views.

Note: The difference in the proposed buffer width reflects the relatively high importance of permanent views for residents from homesteads relative to transient views of travellers from roads.

- » Medium sensitivity areas include:
 - * Watercourses and a buffer of 250m either side of watercourses. These areas are proposed in order to protect these natural features within the proposed focus area.
- » Low sensitivity areas include:
 - * Valley side slopes the development of which is likely to make the project least obvious from surrounding areas. The fact that development may be focused on areas with relatively low sensitivity does not preclude the necessity for mitigation.

The elements associated with the proposed grid connection are to a degree subject to the locations of the proposed renewable energy projects. A key consideration is the location of the proposed MTS relative to the renewable energy projects and the connection point on the existing 400kV overhead power line. The closer that it is located to the connection point the shorter the necessary additional 400kV loop in / loop out overhead power line is likely to be.

Whilst this could mean that necessary overhead power line connections between the renewable energy projects and the MTS may be longer, these are likely to be lower power lines with significantly lower impacts.

At this early stage therefore a key consideration from minimising landscape and visual impacts is to locate the MTS as close to the existing 400kV overhead power line as possible as this is likely to minimise the extent of largest elements associated with the proposed grid connection that are likely to result in the largest impacts.

It will also ensure that the impacts associated with these elements are most likely to impact areas that are currently affected by views of the existing 400kV overhead power line which is likely to help safeguard other areas of the landscape that are currently unaffected.

If the necessary overhead power lines and MTS were to be located in a manner that prevented them being visible to stakeholders, the entire focus area would be indicated as being highly sensitive. This wouldn't provide guidance of any value. It also needs to be borne in mind that the overhead power lines and the MTS are likely to be visible to differing extents and distances.

Zones of Theoretical Visibility

Zones of Theoretical Visibility (ZTV) are defined as "a map usually digitally produced showing areas of land within which a development is theoretically visible". ZTVs for the proposed development have been assessed using Global Mapper GIS.

While the power lines may be physically visible as far as the ALV to the west of the site, they are highly unlikely to be visually obvious outside the site area. The substation looks like its located on a ridgeline, however, it is located in a shallow valley adjacent to a ridgeline. The visual effect of this is that the bulk of the substation is only visible intermittently. Apart from approximately 3km of the R39, the substation is likely to be mainly visible from inside the site area.

Since the proposed 400kV loop in / loop out power line that connects to the existing Eskom 400kV power line as well as the higher lattice elements within the MTS is located close to a ridgeline, they are likely to be visible throughout the majority of the LVE. The ZTV also shows that these elements are likely to be most visible to the west.

Although there are several low voltage power lines supported by wooden poles, the site area is relatively free of power lines and other electrical infrastructure. The exception to this is the area where the Camden / Sol 2 400kV and the Camden / Tutuka 1 400kV power lines cross the site. However, due to the topography these powerlines are largely hidden from surrounding areas. They only become highly obvious as they cross ridgelines.

The proposed MTS and 400kV loop in / loop out power lines will exacerbate the impact of HV power lines in the area. However, as they are so close to the existing lines, they are unlikely to extend the existing area of impact.

The introduction of the new 132kV power lines will add to the sight of electrical infrastructure in the landscape however, this will only affect the site area. Given the possible development of renewable energy projects within the site, this is likely to be seen as in keeping with the overall development. There is also another WEF project (Hendrina) that is proposed approximately 25km to the north of the Umbila WEF. At the time of reporting, it is understood that application documents have just been submitted to the Competent Authority for this project.

In addition to the Hendrina project, large scale electrical infrastructure is likely to be obvious in and around the other major industrial projects in the region including Tutuka Power Station. Therefore, the proposed project could increase regional perceptions, however, because impacts are largely limited to the site area, this effect is also likely to be minimal.

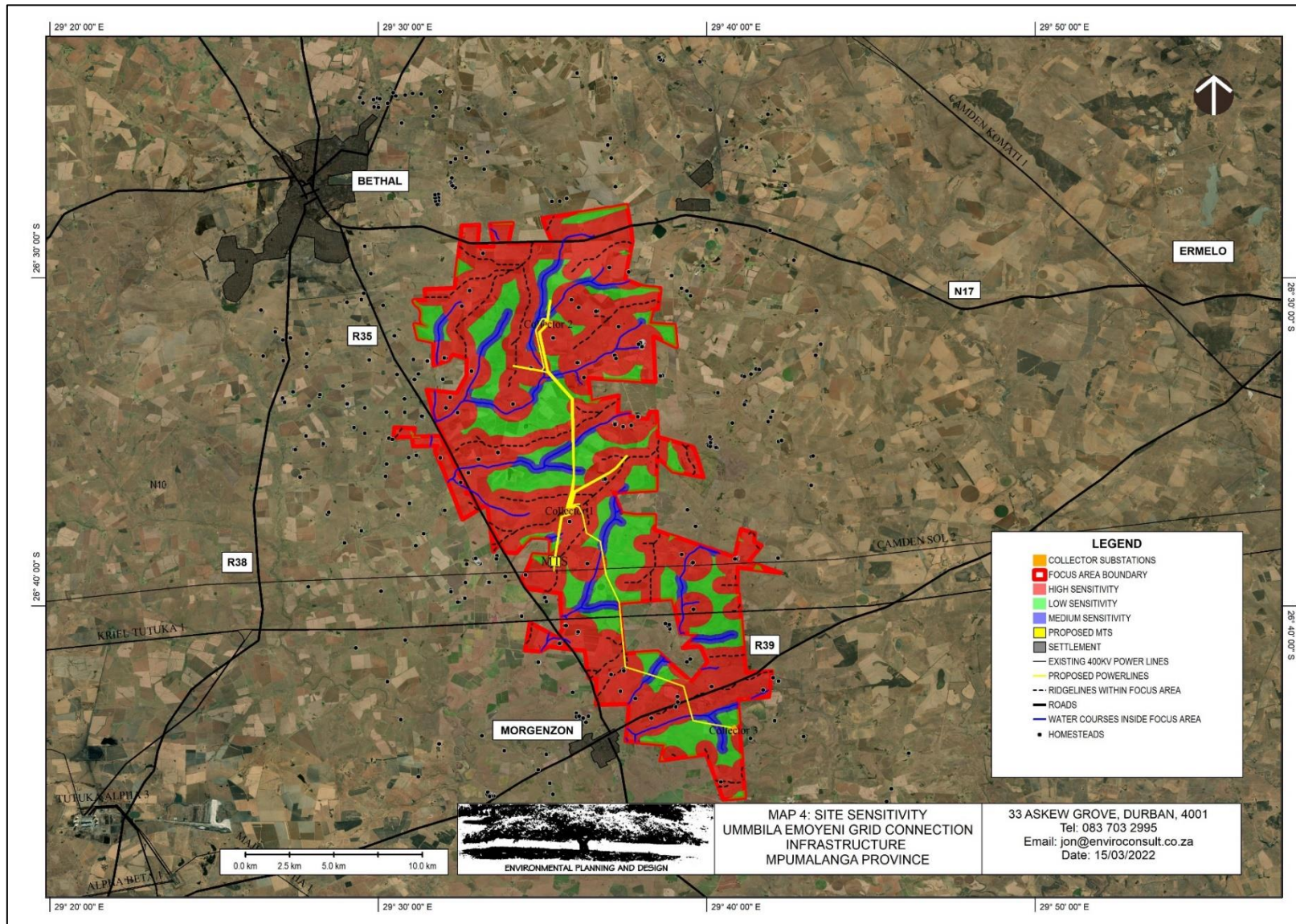


Figure 8.11: Visual sensitivities identified within the project site

8.9.2 Description of Visual Impacts

The following list of possible impacts have been identified:

- » The proposed development could change the character and sense of place of the landscape setting;
- » The proposed development could change the character of the landscape as seen from the local roads;
- » The proposed development could change the character of the landscape as seen from local agricultural homesteads;
- » The proposed development could change the character of the landscape as seen from private nature reserves; and

The potential visual impact of operational, safety and security lighting of the facility at night.

8.9.3 Impact table summarising the significance of visual impacts during construction, operation and decommissioning (with and without mitigation)

Construction, Operation and Decommissioning Phase Impacts

Nature: The proposed development could change the character and sense of place of the landscape setting (Landscape Change)

The proposed grid connection infrastructure is located within a landscape area with an overriding rural character. The character of the affected area is relatively typical within the region. Other large scale industrial operations including mining operations and power stations are relatively obvious in the region. Whilst the proposed renewable energy farm including the grid connection infrastructure project will create a new large scale industrial node within the agricultural landscape, this is not entirely out of character with the broader region. It will however be a significant local character change.

Grid connection infrastructure is unlikely to be obvious from outside the site and so should not affect perceptions of landscape character change for the majority of people.

In terms of mitigating the impact of infrastructure, this has largely been undertaken by minimising the extent of the bulkier and taller 400kV powerlines through the location of the MTS in close proximity to the connection point to existing Eskom 400kV overhead powerlines.

The difference made by mitigation is that degradation due to erosion is less likely to draw attention to the infrastructure.

	Without mitigation	With mitigation
Extent	Local (2)	Local (2)
Duration	Long term (4)	Long term (4)
Magnitude	Minor to Low (3)	Minor to Low (3)
Probability	Probable (3)	Improbable (2)
Significance	Low (27)	Low (18)
Status (positive or negative)	The proposed infrastructure is likely to be more obvious to people living on homesteads or travelling within the site area. Because of this they may consider the landscape change to be a negative impact. People who are located outside the site are unlikely to notice the new	Neutral to Negative

	infrastructure. They are therefore unlikely to consider the landscape change to be a negative impact. Neutral to Negative	
Reversibility	High	High
Irreplaceable loss of resources?	The proposed development can be dismantled and removed at the end of the operational phase. There will therefore be no irreplaceable loss. However, given the likely long-term nature of the project, it is likely that a proportion of stakeholders will view the loss of view as irreplaceable.	No irreplaceable loss
Can impacts be mitigated?	Yes	
Mitigation/Management:		
<u>Planning:</u>		
» Plan to undertake rehabilitation and erosion control.		
<u>Operations:</u>		
» Minimise disturbance.		
» Undertake rehabilitation and erosion control.		
<u>Decommissioning:</u>		
» Remove infrastructure not required for the post-decommissioning use of the site;		
» Rehabilitate and monitor areas for vegetation cover post-decommissioning and implement remedial actions.		
Residual Impacts:		
The residual risk relates to loss of natural vegetation cover being obvious on decommissioning of the proposed project. It is therefore critical that effective rehabilitation is undertaken.		

Nature: *The proposed development could change the character of the landscape as seen from Silver Water Private Nature Reserve*

The Silver Water Nature Reserve which is a private facility and is primarily a local tourism facility offering accommodation in tranquil surroundings around a large dam.

The ZTV analysis indicates that only the 132kV overhead power line could be visible from Silver Water. However, because it is located outside the LVE and because there are mature trees between the lodge and the power line. It is highly unlikely that views of infrastructure will be visible from Silver Water.

	Without mitigation	With mitigation
Extent	Local (1)	NA
Duration	Long term (4)	NA
Magnitude	Small (0)	NA
Probability	Very improbable (1)	NA
Significance	Low (5)	NA
Status (positive or negative)	The infrastructure will not be seen. Neutral	NA
Reversibility	High	NA
Irreplaceable loss of resources?	No irreplaceable loss	No irreplaceable loss.
Can impacts be mitigated?	NA	
Mitigation/Management:		
» NA		
Residual Impacts:		

NA

Nature: The proposed development could change the character of the landscape as seen from local main roads

Only a short section of the R35 is likely to be affected.

- » The 132kV powerline may be obvious over approximately 3km of the road;
- » The lower bulk of the MTS may be obvious over approximately 2.6km of the road; and
- » The 400kV loop in / loop out power line and the upper sections of the MTS could be visible from approximately 1.1 km of the road.

The difference made by mitigation is that degradation due to erosion is less likely to draw attention to the infrastructure.

	Without mitigation	With mitigation
Extent	Site and immediate surroundings, (2)	Site and immediate surroundings, (2)
Duration	Long term - (4)	Long term - (4)
Magnitude	Minor to Low, (3)	Minor (2)
Probability	Probable (3)	Improbable (2)
Significance	Low (27)	Low (16)
Status	If landscape degradation due to lack of management occurs, attention is likely to be drawn to the infrastructure. Negative	If no landscape degradation occurs, motorists are unlikely to give the infrastructure a second look. Neutral
Reversibility	High	NA
Irreplaceable loss	No irreplaceable loss	No irreplaceable loss.
Can impacts be mitigated?	Yes	

Mitigation / Management:

Planning:

- » Plan to undertake rehabilitation and erosion control.

Operations:

- » Minimise disturbance.
- » Undertake rehabilitation and erosion control.

Decommissioning:

- » Remove infrastructure not required for the post-decommissioning use of the site;
- » Rehabilitate and monitor areas for vegetation cover post-decommissioning and implement remedial actions.
- »

Residual Impacts:

The residual risk relates to loss of natural vegetation cover being obvious on decommissioning of the proposed project. It is therefore critical that effective rehabilitation is undertaken.

Nature: The proposed development could change the character of the landscape as seen from local minor unsurfaced roads.

There are several unsurfaced roads that run through the proposed site and close to the proposed infrastructure. Whilst some sections of roads are important for local recreation and tourism, the majority of road users are likely to be more interested in agricultural productivity rather than aesthetics.

The relatively low numbers of vehicles that use these roads is also likely to make the visual impacts less significant.

The infrastructure is unlikely to be obvious from outside the site.

	Without mitigation	With mitigation
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Extent	Local, (2)	Local, (2)
Duration	Long term (4)	Long term (4)
Magnitude	Low (4)	Minor to Low (3)
Probability	Probable (3)	Improbable (2)
Significance	Medium (30)	Low (18)
Status	The proposed infrastructure is likely to be obvious to people travelling within the site area. Because of this they may consider the landscape change to be a negative impact. This is particularly likely to be the case if poor management results in degradation / erosion. Negative	If management of construction guards against degradation / erosion some road users are unlikely to be concerned about the new infrastructure. Negative / Neutral
Reversibility	High	High
Irreplaceable loss	The proposed development can be dismantled and removed at the end of the operational phase. There will therefore be no irreplaceable loss. However, given the likely long-term nature of the project, it is likely that a proportion of stakeholders will view the loss of view as irreplaceable.	No irreplaceable loss.
Can impacts be mitigated?	Yes	
Mitigation / Management:		
<u>Planning:</u>		
» Plan to undertake rehabilitation and erosion control.		
<u>Operations:</u>		
» Minimise disturbance.		
» Undertake rehabilitation and erosion control.		
<u>Decommissioning:</u>		
» Remove infrastructure not required for the post-decommissioning use of the site;		
» Rehabilitate and monitor areas for vegetation cover post-decommissioning and implement remedial actions.		
Residual Impacts:		
The residual risk relates to loss of natural vegetation cover being obvious on decommissioning of the proposed project. It is therefore critical that effective rehabilitation is undertaken.		

Nature: *The proposed development could change the character of the landscape as seen from homesteads.*

There are a large number of homesteads within the proposed development area and the surrounding rural landscape.

These are largely comprised of farmsteads and agricultural workers houses.

Four of these homesteads are within 100m of the proposed 132kV powerline. The closest homestead is approximately 1.3km from the proposed MTS. Most farmsteads are also set amongst large trees which will help to screen views of infrastructure.

Impacts are also likely to be mitigated by the fact that landowners are likely to benefit financially from the proposed project and the majority of residents are likely to be more interested in productivity of the land rather than aesthetics.

	Without mitigation	With mitigation
Extent	Local, (2)	Local, (2)
Duration	Long term (4)	Long term (4)
Magnitude	Low (4)	Minor to Low (3)
Probability	Probable (3)	Improbable (2)
Significance	Medium (30)	Low, (18)
Status	The proposed infrastructure is likely to be obvious to some people living within the site area. Because of this they may consider the landscape change to be a negative impact. This is particularly likely to be the case if poor management results in degradation / erosion. Negative	If management of construction guards against degradation / erosion some road users are unlikely to be concerned about the new infrastructure. Negative / Neutral
Reversibility	High	High
Irreplaceable loss	The proposed development can be dismantled and removed at the end of the operational phase. There will therefore be no irreplaceable loss. However, given the likely long-term nature of the project, it is likely that a proportion of stakeholders will view the loss of view as irreplaceable.	No irreplaceable loss.
Can impacts be mitigated?	Yes	
Mitigation / Management:		
<u>Planning</u>		
» Plan to undertake rehabilitation and erosion control.		
<u>Operations:</u>		
» Minimise disturbance.		
» Undertake rehabilitation and erosion control.		
<u>Decommissioning:</u>		
» Remove infrastructure not required for the post-decommissioning use of the site.		
» Rehabilitate and monitor areas for vegetation cover post-decommissioning and implement remedial actions.		
Residual Impacts:		
The residual risk relates to loss of natural vegetation cover being obvious on decommissioning of the proposed project. It is therefore critical that effective rehabilitation is undertaken.		

Nature: *The potential visual impact of operational, safety and security lighting of the facility at night.*

The only section of the infrastructure that is likely to require lighting is the MTS. From observation, most large substations appear to be floodlit. It is assumed that this is in order to address security issues as well as occasional necessary night time maintenance.

Lighting within the area is generally comprised of low level lighting of individual homesteads.

The closest receptor (homestead) that could be affected is approximately 1.3km from the MTS.

	Without mitigation	With mitigation
Extent	Local, (2)	Local, (2)

Duration	Long term (4)	Long term (4)
Magnitude	Minor to Small (1)	Small (0)
Probability	Probable (3)	Improbable (2)
Significance	Low (21)	Low (12)
Status	Only the closest receptors may see lighting as a negative impact. Negative / Neutral	With mitigation, under normal conditions, lighting is likely to be similar in character to the existing situation. Neutral
Reversibility	High	High
Irreplaceable loss	No irreplaceable loss.	No irreplaceable loss.
Can impacts be mitigated?	Yes	
Mitigation / Management:		
<u>Planning:</u>		
» Careful design of security and operational lighting;		
» Ensure that operational lighting is only activated when necessary, the splitting of circuits and use of movement sensors should be considered.		
» Ensure that security lighting is only activated when necessary, the use of movement sensors and / or infra-red systems should be considered;		
» No high mast lighting should be used.		
<u>Operations:</u>		
» Ensure that the intention of the original lighting design is maintained throughout the operational phase.		
»		
<u>Decommissioning:</u>		
» Ensure that all lighting facilities are removed.		
Residual Impacts:		
There are no residual risks.		

8.9.4 Overall Result

It was determined that the potential visual impacts would include:

- » The impact on the landscape in the area was assessed as having an impact of low significance.
- » The impact relating to views from private nature reserves was assessed as having a low significance.
- » The impact relating to views from local unsurfaced minor roads was assessed as having a medium significance within and of low significance after mitigation.
- » The impact relating to views from local homesteads was assessed as having a Medium Negative Significance without mitigation and a Low Significance after mitigation.
- » The impact relating to lighting (both aircraft warning lighting and security and operational lighting) was assessed as likely to have low significance with mitigation.

The proposed project will generally result in landscape and visual impacts of low to high significance. Subject to mitigation measures being undertaken, particularly the from a Landscape and Visual Impact perspective, it is the specialist's opinion that there is no reason why the proposed development should not be authorised.

8.10. Assessment of Socio-Economic Impacts

Potential social impacts and the relative significance of the impacts associated with the development of the Umbila Emoyeni EGI are summarised below (refer to **Appendix K**).

8.10.1 Results of the Socio-Economic Impact Assessment

The development of renewable energy is strongly supported at a national, provincial, and local level. The development of and investment in renewable energy is supported by the National Development Plan (NDP), New Growth Path Framework and National Infrastructure Plan, which all refer to and support renewable energy. The Mpumalanga Economic Growth & Development Path, the Gert Sibande District Municipality Integrated Development Plan (IDP) and the IDPs for the Govan Mbeki and Lekwa local municipalities also support the development of renewable energy. The development of the proposed grid connection infrastructure is therefore supported by key policy and planning documents.

8.10.2 Description of Socio-Economic Impacts

Impacts are expected to occur with the development of the Umbila Emoyeni EGI during the construction, operation and decommissioning phases. Both positive and negative impacts are identified and assessed.

Impacts during construction include:

- » Impact on production.
- » Impact on the Gross Domestic Product (GDP).
- » Impact on employment creation.
- » Skills development.
- » Household income and standard living.
- » Temporary increase in government revenue.
- » Change in sense of place.
- » Safety and security.
- » Agricultural operations.
- » Influx of people.
- » Daily movement patterns.

Impacts during the operation phase include:

- » Impact on production.
- » Impact on the GDP.
- » Employment creation.
- » Household income and standard of living.
- » Increase in government revenue.
- » Rental revenue for landowners.
- » Improvement in energy sector generation.
- » Visual and sense of place impacts.
- » Impacts on agricultural operations.

8.10.3 Impact tables summarising the significance of socio-economic impacts during construction, operation and decommissioning (with and without mitigation measures)

Construction Phase Impacts

<p>Nature: <i>Expenditure associated with the construction of the proposed Umbila Emoyeni EGI will impact on the production of the local economy</i></p>

The proposed grid connection infrastructure will cost R 900 million (2022 prices) to establish. This will equate to a total impact of R 3,6 billion (direct, indirect, and induced) on production/new business sales in the country. The localised expenditure on the project will stimulate the local and national economies albeit for a temporary period of 24 months during construction.		
	Without enhancement	With enhancement
Extent	Local (3)	Local (3)
Duration	Short-term (1)	Short-term (1)
Magnitude	Moderate (6)	Moderate (6)
Probability	Highly probable (4)	Highly probable (4)
Significance	Medium (40)	Medium (40)
Status (positive or negative)	Positive	Positive
Reversibility	Medium	Medium
Irreplaceable loss of resources?	No	No
Can impacts be enhanced?	Yes (enhance)	Yes
Enhancement:		
» The project developer should use locally sourced inputs where feasible in order to maximize the benefit to the local economy.		
» Sub-contracting of local construction companies to occur as far as possible for the construction of facilities.		
Residual Impact:		
Short term Economic injection into the local and regional economy.		

Nature: <u>Temporary increase in country's GDP due to capital expenditure during the construction period</u>		
It is estimated that the project will increase the GDP directly in the country by R 257,2 million in 2022 prices, which will translate into a total impact of R 1,0 billion (direct, indirect, and induced) of Gross Domestic Product (GDP). These effects will take place for the duration of construction.		
The greatest effects on production and GDP stimulated during construction activities will be created through the multiplier effects, specifically through a combination of production and consumption induced effects. The former refers to the impact generated along backwards linkages when the project creates demand for goods and services required for construction and subsequently stimulates the business sales of the suppliers of inputs that are required to produce these goods and services. The latter refers to the effects of household spending which is derived from an increase in salaries and wages directly and indirectly stimulated by the project's expenditure.		
Sectors and industries that will experience the greatest stimulus from this expenditure include:		
» Basic metals, structural metal products and other fabricated metal products industries		
» Trade		
» Insurance		
» Transport services		
» Electrical machinery and apparatus		
	Without enhancement	With enhancement
Extent	Local (2)	Local (2)
Duration	Short-term (1)	Short-term (1)
Magnitude	Moderate (6)	Moderate (6)
Probability	Highly probable (4)	Highly probable (4)
Significance	Medium (36)	Medium (36)
Status (positive or negative)	Positive	Positive
Reversibility	Medium	Medium
Irreplaceable loss of resources?	No	No
Can impacts be enhanced?	Yes (enhance)	Yes
Enhancement:		

» The project developer is to use locally sourced inputs where feasible in order to maximize the benefit to the economy.

Residual Impact:

Short term Economic injection into the local and regional economy.

Nature: *The construction of the Umbila Emoyeni EGI will positively impact the community and beyond by creating a number of job opportunities (albeit temporary).*

The construction of the Project will create 306 Full Time Equivalent (FTE) employment positions over the course of the development. The total number of jobs that will be created is estimated to 1 247 (including direct, indirect and induced. Given the size of the construction sector within the municipality, it is anticipated that there will be sufficient local labour to satisfy the demand for 306 South African based construction workers. Furthermore, if most of the local staff comes from the Local Municipality it will have a positive effect on local unemployment.

Beyond the direct employment opportunities that will be created by the project during the construction phase the development will also have a positive spin-off effect on the employment situation in other sectors of the national and local economies. Through the procurement of local goods (i.e., consumption induced effects) the project will support an estimated total of 535 FTE employment positions (indirect). Most of these positions will be in sectors such as construction, business services and trade. The expenditure on the project outside of the local economies will also have a positive effect on employment creation, albeit for a temporary period of 24 months.

Through the production and consumption induced impacts the project is envisioned to create an estimated additional 406 FTE employment (induced) positions. Given that a significant portion of the multiplier effects will be generated through backward linkages, more than half of these FTE employment positions will be created along the supply chain and amongst industries providing inputs to the businesses in the supply chain. Throughout the construction phase it is recommended that the developer encourage the EPC contractor to fill as many local positions as possible using labour from within the Local Municipality rather than from outside of the municipal boundaries.

	Without enhancement	With enhancement
Extent	Local (2)	Local (2)
Duration	Short-term (1)	Short-term (1)
Magnitude	Moderate (6)	Moderate (6)
Probability	Definite (5)	Definite (5)
Significance	Medium (45)	Medium (45)
Status (positive or negative)	Positive	Positive
Reversibility	Medium	Medium
Irreplaceable loss of resources?	No	No
Can impacts be enhanced?	Yes (enhance)	Yes

Enhancement:

- » Organise local community meetings to advise the local labour on the project that is planned to be established and the jobs that can potentially be applied for.
- » Where feasible, effort must be made to employ locally in order to create maximum benefit for the communities.

Residual Impact:

No residual impacts are applicable.

Nature: *Employees will develop and enhance skills thereby increasing experience and knowledge*

The construction of the grid connection infrastructure is likely to have a positive impact on the skills development in South Africa. During the Umbila Emoyeni EGI assembly and manufacturing period which is included as part of the construction phase and is planned to be conducted in Mpumalanga, it is likely that foreign technical experts will be involved. This will present an opportunity for skills and knowledge transfer between these technical experts and local

manufacturers. It is also expected that the construction staff involved in the project will gain knowledge and experience in respect of the development of Umbila Emoyeni EGI infrastructure.

More skilled local construction staff would most likely also lower the cost of similar projects in the future. In addition to the direct effects of the project on skills development in the country and the local economy, the project could contribute to the development of the local research and development (R&D) and manufacturing industries associated with Umbila Emoyeni EGI. This could be achieved through partnerships with the University of Mpumalanga (situated in the Mbombela Local Municipality). Partnerships of this nature could further enhance the development of new skills and expertise.

	Without enhancement	With enhancement
Extent	Local (2)	Local (2)
Duration	Permanent (5)	Permanent (5)
Magnitude	Low (4)	Low (4)
Probability	Definite (5)	Definite (5)
Significance	Medium (55)	Medium (55)
Status (positive or negative)	Positive	Positive
Reversibility	Low	Low
Irreplaceable loss of resources?	No	No
Can impacts be enhanced?	Yes	Yes
Enhancement:		
<ul style="list-style-type: none"> » In order to maximise the positive impact, it is suggested that the project company provide training courses for employees where feasible to ensure that employees gain as much as possible from the work experience. » Facilitate the transfer of knowledge between experienced employees and the staff. » Perform a skills audit to determine the potential skills that could be sourced in the area. 		
Residual Impact:		
Skills developed during the project can be utilised in future.		

Nature: Employed individuals will increase the income of their respective households and thereby experience an improvement in their standard of living

The proposed grid connection infrastructure will create an estimated total of 1 247 South African based FTE employment positions during construction generating R 499,2 million of revenue for the affected households in the country through direct, indirect, and induced effects. Of this figure R 122,7 million will be paid out in the form of salaries and wages to those individuals directly employed during the construction phase. The remaining R 376,9 million in households' earnings will be generated through indirect and induced effects resulting from project expenditure. Although temporary, this increase in household earnings will have a positive effect on the standard of living for these households. This is especially applicable to the households benefitting from the project that reside in the Local Municipality and broader Mpumalanga.

	Without enhancement	With enhancement
Extent	Local (2)	Local (2)
Duration	Short-term (1)	Short-term (1)
Magnitude	Moderate (6)	Moderate (6)
Probability	Highly probable (4)	Highly probable (4)
Significance	Medium (36)	Medium (36)
Status (positive or negative)	Positive	Positive
Reversibility	Medium	Medium
Irreplaceable loss of resources?	No	No
Can impacts be enhanced?	Yes (enhance)	Yes
Enhancement:		
» Local employment will benefit local households and the local area.		
Residual Impacts:		

No residual impacts are applicable.

Nature: *The investment in the Umbila Emoyeni EGI will generate revenue for the government during the construction period through a combination of personal income tax, VAT, companies' tax etc.*

The investment in the facility will generate revenue for the government during the construction period through a combination of personal income tax, VAT, companies' tax etc. Additional government revenue will also be earned through corporate income tax, however since the gross operating surplus of the EPC contractor employed to construct the facility is not known, an estimate of the overall corporate income tax value is not possible at this stage. Government earnings will be distributed by national government to cover public spending which includes amongst others the provision and maintenance of transport infrastructure, health, and education services as well as other public goods.

	Without enhancement	With enhancement
Extent	Local (2)	N/A
Duration	Short-term (1)	N/A
Magnitude	Moderate (6)	N/A
Probability	Highly probable (4)	N/A
Significance	Medium (36)	N/A
Status (positive or negative)	Positive	N/A
Reversibility	Medium	N/A
Irreplaceable loss of resources?	No	N/A
Can impacts be enhanced?	No	N/A

Enhancement:

» No enhancement measures are required.

Residual Impacts:

No residual impacts are applicable.

Nature: *Sense of place impacts (visual, noise and dust)*

	Without mitigation	With mitigation
Extent	Local (1)	Local (1)
Duration	Short duration (1)	Short duration (1)
Magnitude	Moderate (6)	Low (4)
Probability	Highly probable (4)	Highly probable (4)
Significance	Medium (32)	Medium (24)
Status (positive or negative)	Negative	Negative
Reversibility	Medium	Medium
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Yes	Yes

Mitigation:

- » Ensure proper health and safety plans in place during the construction period to ensure safety on and around site during construction
- » Install screens around the construction site to reduce the visual impact of construction on surrounding properties
- » Site watering (or use of appropriate dust suppressant) from time to time to reduce dust emitting from the construction site

Residual Impacts:

No residual impacts are applicable.

Nature: *The in-migration of job seekers to the area could be perceived to result in increased criminal activity*

The perception exists from the landowners that an influx of jobseekers, and / or construction workers to an area is a contributor to increased criminal activities in an area, such as increased safety and security risk for neighbouring properties and damage to property, increased risk of veld fire, stock theft, and crime etc. It is confirmed by the developer that patrols will be put in place to ensure the safety of the infrastructure and the household where the Project will be located.

	Without mitigation	With mitigation
Extent	Local (1)	Local (1)
Duration	Short duration (1)	Short duration (1)
Magnitude	Moderate (6)	Low (4)
Probability	Probable (3)	Probable (3)
Significance	Low (24)	Low (18)
Status (positive or negative)	Negative	Negative
Reversibility	Medium	Medium
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Yes	Yes
Mitigation:		
<ul style="list-style-type: none"> » Have a detailed consultation and communication plan with neighbouring property owners to keep them informed with regards to construction progress, issues and potential dangers » Ensure proper health and safety plans in place during the construction period to ensure safety on and around site during construction, including fencing of the property and site access restriction 		
Residual Impacts:		
A minimal amount of migrant labour will be employed by the proposed project and remain in the area.		

Nature: Loss of agricultural space

As construction begins at the proposed site, disturbances will likely be minimal. The presence of construction machinery, increased traffic to and from the site (transporting staff, equipment, and material) and staff on or near the site will likely be the largest disturbances. The longer construction continues, the greater the disturbances will likely be.

Once construction is completed the disturbances associated with the vehicular traffic, equipment and staff will be reduced. According to the landowner's survey's they indicated that some agricultural land will be lost, interference with agricultural activities (especially large implements) and aerial spraying will be the negative influences, as well as reconstruction of animal camps and access roads, however, they indicated that they are not sure on the amount and which infrastructure will be located on their properties. Thus, the initial impact on the agricultural operations will be minor. This will be confirmed by the agricultural assessment.

	Without mitigation	With mitigation
Extent	Local (1)	Local (1)
Duration	Short duration (1)	Short duration (1)
Magnitude	Moderate (6)	Low (4)
Probability	Highly probable (4)	Highly probable (4)
Significance	Low (32)	Low (24)
Status (positive or negative)	Negative	Negative
Reversibility	Medium	Medium
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Yes	Yes
Mitigation:		
» Construct the grid connection infrastructure on parts where the least arable land will be affected.		
Residual Impacts:		
No residual impacts are applicable.		

Nature: <i>An impact on the demographics of the area as a result of in-migration in response to job opportunities will occur</i>		
	Without mitigation	With mitigation
Extent	Local (1)	Local (1)
Duration	Short duration (1)	Short duration (1)
Magnitude	Moderate (6)	Low (4)
Probability	Probable (3)	Probable (3)
Significance	Low (27)	Low (18)
Status (positive or negative)	Negative	Negative
Reversibility	Medium	Medium
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Yes	Yes
Mitigation:		
<ul style="list-style-type: none"> » Where feasible, effort must be made to employ local labour in order to create maximum benefit for the communities and limit in-migration. » Train unemployed local community members with insufficient skills and increase absorption of local labour thereby decreasing in-migration. 		
Residual Impacts:		
Workers remaining after the construction period without work will put strain on public resources.		

Nature: <i>An increase in traffic due to construction vehicles and heavy vehicles could create short-term disruptions and safety hazards for current road users and an increase in the demand for basic services</i>		
<p>The proposed grid connection infrastructure will create and estimated 306 FTE employment positions (South African based positions) for the duration of the project. Given that these workers will require services there is likely to be an increase in the demand for social services, access to water and electricity. Given the proximity of the development site to Bethal and Morgezon, it is most likely that the health facilities in the area will experience additional demand for medical services brought about by the influx of job seekers.</p> <p>These connections will, however, be minimal and it is unlikely to alter the demand significantly. The effects of the project on road infrastructure should also be considered as it is highly likely that the development will lead to an increase in traffic volumes on surrounding roads. The deterioration of these roads could place additional financial burdens on the municipality through additional maintenance costs.</p> <p>Additional traffic volumes are also likely to impact the condition of secondary roads used to access surrounding farms. Based on the above discussion it is expected that the basic service provision, health facilities and road infrastructure will be under additional strain during the construction period. Given that the project is anticipated to attract additional people to the area the significance of the impact is considered to be medium. These impacts can however be mitigated if the developer engages with the local municipalities and plans accordingly.</p>		
	Without mitigation	With mitigation
Extent	Local (2)	Local (1)
Duration	Short duration (1)	Short duration (1)
Magnitude	Moderate (6)	Low (4)
Probability	Highly probable (4)	Highly probable (4)
Significance	Medium (36)	Low (24)
Status (positive or negative)	Negative	Negative
Reversibility	Medium	Medium
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Yes	Yes
Mitigation:		
» Provide public transportation service for workers in order to reduce congestion on roads.		

- » Partner with local municipalities and other prominent users of the local roads to upgrade them to meet the required capacity and intensity of the vehicles related to the planned construction activities.
- » Transportation contractors must adhere to the road rules and regulations.
- » Utilise only designated access routes & entrance/exits from the site.
- » Implement appropriate signage & road safety measures at entrance/exit to the site and on site.

Residual Impacts:

No residual impacts are applicable.

Operation Phase Impacts

There are no operational phase impacts associated with the Umbila Emoyeni EGI.

Decommissioning Phase Impacts

There are no decommissioning phase impacts associated with the Umbila Emoyeni EGI.

8.10.4 Overall Result

Both positive and negative impacts are expected throughout the construction of the proposed grid connection infrastructure. Positive impacts during construction are expected to be of medium significance pre-enhancement and can be increased to medium (different score) post-enhancement. Negative impacts during construction are expected to be of medium and low significance pre-mitigation and can be reduced to medium (different score) and low significance post-mitigation, depending on the type of impact.

The net positive impacts associated with the development of the proposed project are expected to outweigh the net negative effects. The project is also envisaged to have a positive stimulus on the local economy and employment creation, leading to the economy's diversification and a small reduction in the unemployment rate. The project should therefore be considered for development. It should, however, be acknowledged that the negative impacts would be largely borne by the nearby farms and households residing on them, whilst the positive impacts will be distributed throughout both the local and national economies. Due to this imbalance, it is recommended that the mitigation measures suggested being strictly adhered to. Application of these mitigation measures will ensure that the negative impacts on the nearby farms and businesses are minimised and that the distribution of the potential benefits of the project are more balanced.

8.11. Assessment of Impacts on Traffic

Potential impacts on the traffic components of the affected area and the relative significance of the impacts associated with the development of the Umbila Emoyeni EGI are summarised below (refer to **Appendix L**).

8.11.1 Results of the Traffic Impact Assessment

It is assumed that if components are imported to South Africa, it will be via the Port of Richards Bay in KwaZulu-Natal, or the ports of East London and Ngqura in the Eastern Cape. The Port of Richards Bay is located ~460km travel distance from the proposed site whilst the ports of East London and Ngqura are respectively located ~1 130km and 1 200km travel distance from the proposed site. The Port of Richards Bay is the preferred port of entry; however, the ports of East London and Ngqura can be used as alternatives, should the Port of Richards Bay not be available.

The proposed site is bounded by the N17 in the south, the R39 in the south and east and the R35 in the west. Access to the proposed site can be obtained from any of these three roads, depending on the traffic volumes of each road. The road carrying the least traffic will be considered as the best option. There is also an existing network of unnumbered gravel roads that might be suitable as a main access road to the proposed site.

8.11.2 Description of Traffic Impacts

The potential transport related impacts are described below.

- » Construction Phase
 - * Construction related traffic.
 - * The construction traffic would also lead to noise and dust pollution.
 - * This phase also includes deliveries, excavations and trenching that will temporarily generate the most traffic.
- » Operational Phase
- » Traffic during the operational phase will consist of maintenance staff maintaining the proposed infrastructure. The trips generated during this phase are deemed low, as the operational trips will only be for occasional maintenance requirements. Decommissioning Phase
 - * This phase will result in the same impact as the construction phase as similar trips are expected.

8.11.3 Impact tables summarising the significance of impacts on traffic during the construction and operation phases (with and without mitigation)

Construction Phase Impacts

Nature: <u>Traffic congestion during the construction phase and increase in noise and dust</u>		
The impact will occur due to added pressure on the road network due to the increase in traffic associated with the transport of equipment, material and staff to site during the construction phase.		
	Without mitigation	With mitigation
Extent	Local (2) - Pressure will only be added on the local road network.	Local (2) - Pressure will only be added on the local road network.
Duration	Short-term (2) - The construction period will last between 1 – 2 years.	Short-term (2) - The construction period will last between 1 – 2 years.
Magnitude	Moderate (6) - The increase in traffic will have a moderate impact on traffic operations.	Low (2) - The increase in traffic will have a low impact on traffic operations.
Probability	Highly probable (4) – The possibility of the impact on traffic operations is highly probable.	Probable (3) – The possibility of the impact on traffic operations is probable.
Significance	Medium (40)	Low (18)
Status (positive or negative)	Negative	Negative
Reversibility	Completely reversible	Completely reversible
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Yes	
Mitigation:		
<ul style="list-style-type: none"> » The delivery of grid components to the site must be staggered and trips must be scheduled to occur outside of peak traffic periods. » Reduce the construction period. » The use of mobile batching plants and quarries in close proximity to the site must be considered as this would decrease the impact on the surrounding road network. » Regular maintenance of gravel roads by the Contractor during the construction and decommissioning phases. » It is recommended to avoid staggered intersections on the main access road. Intersections should rather be consolidated or realigned as far as possible. » Dust suppression of gravel roads during the construction and decommissioning phases, as required. » Staff and general trips should occur outside of peak traffic periods as far as possible. » Any low hanging overhead lines (lower than 5.1 m) e.g., Eskom and Telkom lines, along the proposed routes will have to be moved to accommodate the abnormal load vehicles. » The internal gravel roads will require grading with a road grader to obtain a flat even surface and the geometric design of these gravel roads needs to be confirmed at detailed design stage. This process is to be undertaken by a civil engineering consultant or a geometric design professional. The road designer should take cognizance that roads need to be designed with smooth, relatively flat gradients to allow an abnormal load vehicle to ascend to the top of a hill. 		
Residual Impacts:		
Traffic will return to normal levels after construction is completed.		

Operation Phase Impacts

The operational phase will not generate any significant traffic volumes and will not have any impact on the surrounding road network.

Decommissioning Phase Impacts

The decommissioning phase will result in the same impact as the construction phase as similar trips are expected. The potential traffic impact will be of medium significance before mitigation measures during the construction and decommissioning phases. However, considering that this is temporary and short term in nature, the impact can be mitigated to an acceptable level of low significance.

8.11.4 Overall Result

The construction and decommissioning phases of an EGI are the only significant traffic generators and therefore noise, dust and exhaust pollution will be higher during these phases. The duration of these phases is short term i.e., the impact of the EGI on traffic on the surrounding road network is temporary. The access point to the proposed site has been assessed and was found to be acceptable from a transport perspective. The development is supported from a transport perspective provided that the recommendations and mitigation measures are adhered to.

8.12. Assessment of the 'Do Nothing' Alternative

The 'do-nothing' alternative (i.e., no-go alternative) is the option of not constructing the Umbila Emoyeni EGI. Should this alternative be selected, there would be no environmental impacts on the site or to the surrounding local area due to the construction activities of an EGI. All baseline information provided in this report relates to the current situation on site and in the surrounding area, and can be considered the no-go alternative. Impacts are limited to the status quo. All negative impacts, specifically related to the development of the EGI, discussed in this report will not materialise. In addition, positive impacts identified to be associated with the project will be foregone. These are described below.

a) Land use and agriculture

Various crop field boundaries within the grid corridor were identified by means of the DFFE Screening Tool (2022), which are predominantly characterised by "High" sensitivities with one area being classified as "Very High" sensitivity. The crop fields within the grid corridor are cultivated (mixture of mainly maize with some soya bean cultivation), and therefore, there are a number of agricultural employment opportunities generated by this land use within the grid corridor. However, it is not envisaged that the number of agricultural employment opportunities generated by the agricultural activities within the project site would exceed the number of skilled, semi-skilled and unskilled employment opportunities that would be created by the construction of the Umbila Emoyeni EGI. The development of the grid connection infrastructure would therefore result in a significant gain in employment numbers for the area in which the grid corridor is located, albeit only for the construction phase, especially since the gain in employment numbers will not be accompanied by any losses in agricultural employment as a result of the proposed development since agricultural activities can continue on the site. The implementation of the 'do nothing' alternative would result in the lost opportunity for this additional employment.

The 'do nothing' alternative would result in a lost opportunity in terms of employment and the connection of renewable energy facilities to the national grid. From this perspective the no-go alternative is not preferred when considering land use and agricultural aspects of the project site. Use of the identified site for the development of the proposed EGI is considered to be a preferred land use as the benefits will outweigh the impacts.

From a visual perspective, however, the implementation of the 'do-nothing' alternative will conserve the landscape as it currently is. Transformation will lead to a change in the sense of place for the area. According to the landowners' survey undertaken as part of the socio-economic impact assessment, the Project will not have a significant negative impact on the sense of place.

b) Socio-economic impact

Social: The impacts of pursuing the no-go alternative are both positive and negative as follows:

- » The benefits would be that there is no disruption from an influx of jobseekers into the area, nuisance impacts (traffic, noise and dust during construction), visual impacts and safety and security impacts. The impact is therefore neutral.
- » There would however be an opportunity lost in terms of job creation, skills development and associated economic business opportunities for the local economy, as well as a loss of the opportunity to generate energy from a renewable resource without creating detrimental effects on the environment.

New Business: Some of the positive spin off effects that are to ensue from the project expenditure will be localised in the communities located near the site, such as the towns of Bethal and Morgenzon. The local services sector and specifically the trade, transportation, catering and accommodation, renting services, personal services and business services are expected to benefit the most from the project activities during the construction phase. New business sales that will be stimulated as a result of the establishment of the renewable energy facility, albeit for a temporary period, will be lost with the implementation of the 'do nothing' alternative. Therefore, from a business perspective, the 'do-nothing' alternative is not preferred as there is a loss of new business opportunities.

Employment: The development of the Umbila Emoyeni EGI (and the associated renewable energy projects) within the Govan Mbeki and Lekwa Local Municipalities will aid in a reduction of the unemployment rate. If the EGI is not developed then the unemployment rate will not be positively influenced by the proposed development. The upliftment and socio-economic benefits for individuals within local communities would be forfeited with the implementation of the 'do nothing' alternative. Therefore, from an employment perspective, the 'do-nothing' alternative is not preferred as there is a loss of employment opportunities.

Skills development: The establishment of the Umbila Emoyeni EGI (and associated renewable energy developments) will offer numerous opportunities for skills transfer and development. This is relevant for both on-site activities and manufacturing activities. Various renewable energy facilities are proposed to be developed in the area and in the Mpumalanga Province, which means that the transfer of skills from foreign experts to the local engineers and construction workers will take place, similar to what has taken place where other renewable energy facilities have been constructed and operated within the province. The skills training and transfer benefits for individuals within local communities would be forfeited with the implementation of the 'do nothing' alternative.

Municipal goals: The opportunity to contribute to the innovative energy sourcing methods as identified by the Govan Mbeki and Lekwa Local Municipalities as per a draft policy which sets out the criteria which will enable the evaluation of renewable energy generation infrastructure to be developed in a manner that will limit the potential negative impacts thereof will not be met should the Umbila Emoyeni EGI not be constructed with the implementation of the 'do nothing' alternative.

Foregoing the proposed development would not necessarily compromise the development of renewable energy facilities in South Africa, but would result in a situation where the proposed Umbila Emoyeni Wind

Energy Facility and Umbila Emoyeni Solar Energy Facility (a total of 816MW) would not be connected to the grid. However, the socio-economic benefits for local communities at this location and within the surrounding area would be forfeited. The area has experienced social challenges which has resulted in the need for socio-economic upliftment. The socio-economic impact assessment concluded that there would be greater social benefits associated with the project than the 'do nothing' alternative.

Therefore, from a socio-economic perspective, the 'do-nothing' alternative is not preferred due to the loss of socio-economic benefits associated with the project when considering the current socio-economic conditions of the area.

c) Impact on electricity supply and targets regarding renewable energy

At a broader scale, the benefits of additional capacity to the electricity grid and those associated with the introduction of renewable energy would not be realised. Although the Umbila Emoyeni EGI is only proposed to support the energy transmission and distribution originating from the proposed solar and wind farms, this would assist in meeting the electricity demand for the relevant private off-takers and would also assist in meeting the government's goal for renewable energy and the energy mix. The generation of electricity from renewable energy resources offers a range of potential socio-economic and environmental benefits for South Africa. These benefits include:

- » Increased energy security through the provision of new capacity that can be quickly added to the grid;
- » Resource saving (i.e. fossil fuels and water);
- » Exploitation of South Africa's significant renewable energy resource;
- » Pollution reduction;
- » Climate friendly development;
- » Support for international agreements;
- » Employment creation;
- » Acceptability to society; and
- » Support to a new industry sector.

At present, South Africa is some way off from fully exploiting the diverse gains from renewable energy and from achieving a considerable market share in the renewable energy industry. South Africa's electricity supply remains heavily dominated by coal-based power generation, with the country's significant renewable energy potential largely untapped to date. This is particularly true in the Mpumalanga Province where the majority of South Africa's coal-fired generation is located and will be decommissioned in the next 10 – 15 years.

The Integrated Resource Plan (IRP) (2019) provides for the development of 6 000MW of capacity from large scale solar energy facilities by 2030. The IRP essentially drives the assortment of energy to be implemented for South Africa which is known as the energy mix of the country, considering various generation technologies.

8.12.1 Conclusion

The no-go option is the continuation of the existing land use, i.e. maintain the status quo. As detailed in the sections above, there would be no environmental impacts on the site or to the surrounding local area due to the construction activities of grid connection infrastructure with the implementation of this alternative. All negative impacts, specifically related to the development of the EGI, discussed in this report will not materialise.

The 'do-nothing' alternative will do little to influence the renewable energy targets set by government. However, as the project would provide essential supporting infrastructure to the proposed Umbila Emoyeni Wind Energy Facility and Umbila Emoyeni Solar Energy Facility (a total of 816MW), not developing the Umbila Emoyeni EGI would see the opportunity to develop these renewable energy projects being lost as there would be no means for them to connect to the electricity grid. Therefore, the 'do-nothing' alternative is not preferred.

From the specialist studies undertaken, no environmental fatal flaws were identified to be associated with the Umbila Emoyeni EGI subject to implementation of the recommended mitigation measures. All impacts associated with the project can be mitigated to acceptable levels. If the grid connection infrastructure is not developed, the following positive impacts will not be realised:

- » Job creation from the construction and operation phases.
- » Economic benefit to participating landowners due to the revenue that will be gained from leasing the land to the developer.
- » Meeting of energy generation mix in a most economic and rapid manner.
- » Provision of clean, renewable energy in an area where it is optimally available.

As detailed above, the 'do-nothing' alternative will result in a number of lost opportunities. The 'do nothing' alternative is therefore not preferred and not proposed to be implemented for the development of the Umbila Emoyeni EGI.

CHAPTER 9: ASSESSMENT OF POTENTIAL CUMULATIVE IMPACTS

As identified and assessed in Chapter 8, a grid connection development may have effects (positive and negative) on natural resources, the social environment and on the people living in a project area. The preceding impact assessment chapter has reported on the assessment of the impacts associated with the Umbila Emoyeni EGI largely in isolation (from other similar developments).

This chapter assesses the potential for the impacts associated with the project to become more significant when considered in combination with the other operating or proposed wind farm projects within the area.

9.1. Legal Requirements as per the EIA Regulations, 2014 (as amended), for the undertaking of an Environmental Impact Assessment Report

This chapter of the EIA Report includes the following information required in terms of the EIA Regulations, 2014 - Appendix 3: Scope of Assessment and Content of Environmental Impact Assessment Reports:

Requirement	Relevant Section
3(1)(j)(i) an assessment of each identified potentially significant impact and risk, including cumulative impacts.	The cumulative impacts associated with the development of the Umbila Emoyeni EGI are included and assessed within this chapter.

9.2 Approach taken to Assess Cumulative Impacts

The cumulative impacts that have the potential to be compounded through the development of the grid connection infrastructure in proximity to other similar developments include impacts such as those listed below. The role of the cumulative assessment is to confirm if such impacts are relevant to the Umbila Emoyeni EGI within the project site being considered for the development. This assessment considers whether the cumulative impact will result in:

- » Unacceptable loss of threatened or protected vegetation types, habitat, or species through clearing, resulting in an impact on the conservation status of such flora, fauna, or ecological functioning.
- » Unacceptable risk to freshwater features through disturbance associated with construction activities
- » Unacceptable risk to avifauna through habitat loss, displacement, and collision with power lines
- » Unacceptable risk to bats through loss of habitat, infringement on roosting or breeding areas, or risk to collision-prone species.
- » Unacceptable loss of high agricultural potential areas presenting a risk to food security and increased soil erosion.
- » Unacceptable loss of heritage resources (including palaeontological and archaeological resources and the cultural landscape).
- » Complete or whole-scale change in the sense of place and character of an area and unacceptable visual intrusion.
- » Unacceptable impact on traffic and road conditions.
- » Unacceptable negative impact to socio-economic factors and components.

Further to the above, positive cumulative impacts are also expected and will be associated with socio-economic aspects and benefits.

Figure 9.1 indicates the location of the Umbila Emoyeni Renewable Energy Facility and EGI in relation to all other proposed renewable energy facilities and associated grid connection infrastructure known to be located within the surrounding area of the project site. These projects were identified using the DFFE Renewable Energy Database and current knowledge of projects operating and being proposed in the area. For the assessment of cumulative impacts, only developments within a 30km radius from the proposed Umbila Emoyeni EGI were considered (**Table 9.1** and **Figure 9.1**), which is in line with the DFFE requirements.

Table 10.1: Renewable energy facilities located within the broader area (within a 30km radius) of the Umbila Emoyeni EGI project site

Project Name	Project Status
Majuba Solar PV Facility	Authorised
Tutuka Solar PV Facility	Authorised
Forzando North Coal Mine Solar PV Facility	Authorised
Hendrini Renewable Energy Complex	In process

In addition to the renewable energy facilities listed above, a number of existing power lines and substations are located within the area, including several low voltage power lines supported by wooden poles and high voltage infrastructure such as the Camden / Sol 2 400kV and the Camden / Tutuka 1 400kV power lines which cross the study area (**Figure 9.1**).

At the time of writing this EIA Report, the facilities listed in **Table 9.2** was still in process of obtaining Environmental Authorisations, and the facilities listed in **Table 9.1** had already received authorisation, with the exception of the Hendrini Renewable Energy Complex, for which the process to obtain authorisation is still in process. There are no operational facilities. The potential for cumulative impacts is summarised in the sections which follow and have been considered within the specialist studies (refer to **Appendices D – L**).

The sections below provide a summary of the potential for a cumulative impact resulting from several renewable energy developments within a 30km radius of the Umbila Emoyeni EGI are explored (refer also to the specialist reports contained in **Appendix D to L**). Impacts are assessed accordingly in terms of the proposed project in isolation and the impact considering other projects within the area or the cumulative impact, assuming the implementation of mitigation, as was deemed relevant by the specialist. The approach taken by the various specialists in assessing cumulative impacts is informed by the scale at which the impact is likely to occur.

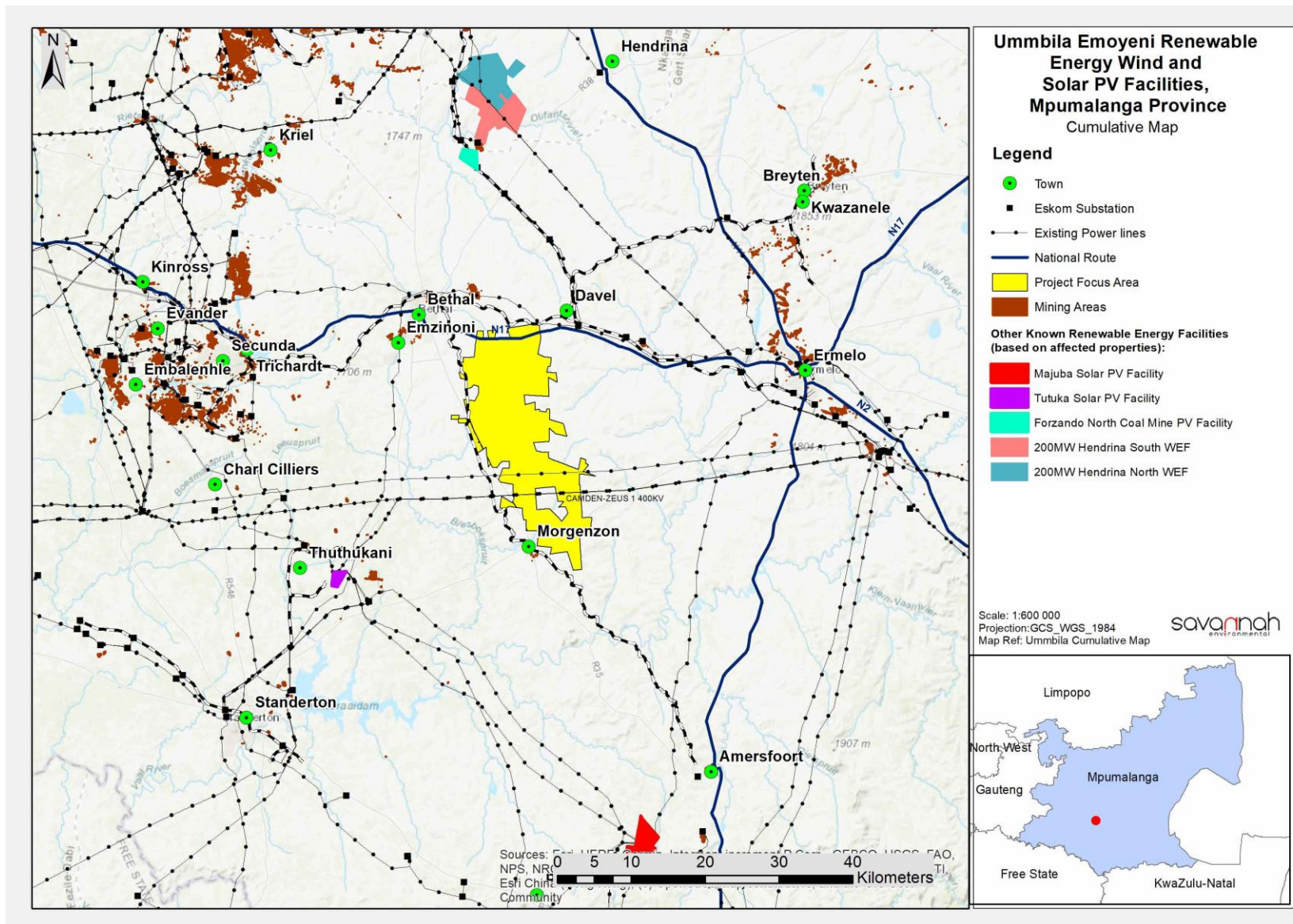


Figure 10.1: Cumulative map illustrating other approved and/or constructed renewable energy facilities and Electrical Grid Infrastructure located within a 30km radius of the Umbila Emoyeni Renewable Energy Facility project site

9.3 Cumulative Impacts on Terrestrial Ecology (including flora and fauna)

Ecosystems consist of a mosaic of many different patches. The size of natural patches affects the number, type and abundance of species they contain. At the periphery of patches, influences of neighbouring patches become apparent, known as the 'edge effect'. Patch edges may be subjected to increased levels of heat, dust, desiccation, disturbance, invasion of exotic species and other factors. Edges seldom contain species that are rare, habitat specialists or species that require larger tracts of undisturbed core habitat. Fragmentation due to development reduces core habitat and greatly extends edge habitat, which causes a shift in the species composition, which in turn puts great pressure on the dynamics and functionality of ecosystems.

Cumulative impacts of developments on population viability of species can be reduced significantly if new developments are kept as close as possible to existing developed and/or transformed areas or, where such is not possible, different sections of a development be kept as close together as possible. Thus, new power lines should follow routes of existing servitudes if such exist. Renewable energy facilities should be constructed as close as possible to existing infrastructure or substations, and if several developments are planned within close proximity, these developments should be situated as close together as possible, not scattered throughout the landscape.

The development of the grid connection and associated infrastructure would result in some habitat loss and an increase in overall cumulative impacts on fauna and flora in the area from electrical transmission infrastructure and wind and solar farm development. Current levels of development in the area from the Umbila renewable facilities and the associated transmission infrastructure development are moderate. A few existing power lines traverse the broader area, furthermore, the following existing renewable energy projects (and associated transmission infrastructure) were considered in terms of their potential cumulative terrestrial ecological impacts (located within a 30 km radius of the Umbila EGI).

Apart from the planned Umbila renewable energy projects (three PV solar facilities and one wind energy facility), only three other renewable facilities are located within the 30 km radius namely:

- » The proposed 9.5 MW Forzando North Coal Mine PV Solar Facility to the north; and
- » the 95.9 MW Tutuka PV Solar Facility to the west; and
- » the proposed 200 MW Hendrina South WEF

The combined, cumulative footprint of all renewable energy projects and their associated transmission infrastructure (located within the 30 km radius) will be approximately 1 761.1 ha, covering only 0.3% of the area within the 30 km radius. Of the 0.3%, the Umbila EGI will contribute 14.2%.

In terms of existing power lines and substations, located within the 30km radius, their footprint within this area has been roughly estimated to be around 628.96 ha (0.1%). The inclusion of the Umbila Emoyeni EGI will result in a 0.05% increase in the total footprint.

However, as described within Sections 5.2 and 6.1 large areas of the EGI will be located/traverse, transformed and disturbed areas (49% of grid line will traverse disturbed and transformed areas, the entire footprint of the collector substation 1 will be located within a transformed area, whilst 73% of the proposed MTS substation will be located within transformed areas). Subsequently, the contribution of the Umbila Emoyeni grid to cumulative impacts will be even less than the above mentioned 0.05%.

Conclusion on cumulative impacts due to this and the surrounding developments:

- » Existing power line, substation infrastructure as well as the planned renewable energy facilities (REFs) will impact a very small area of the 30 km area and will subsequently result in little transformation of intact habitats. Subsequently, the cumulative threat posed by these developments on the ecological functioning of these habitats are very small to insignificant, and it is unlikely that the mentioned infrastructure will result in significant habitat fragmentation, disruption of landscape connectivity, and impair the ability of these habitat types to respond to environmental fluctuations.
- » The proposed Forzando North Coal Mine PV Solar Facility as well as the Hendrina South WEF are located within another vegetation type (Eastern Highveld Grassland) and will subsequently not contribute to the cumulative impact on the Soweto Highveld Grassland.
- » In terms of renewable energy and transmission infrastructure located and planned within the vulnerable Soweto Highveld Grassland:
 - o Most of the renewable energy developments are located within secondary and/or modified grasslands. As such, the cumulative impact on such habitat types and the biodiversity they sustain will be very small.
 - o Due to the linear and small impact nature of power lines, such infrastructure won't contribute significantly to the cumulative impact on natural habitat types and the biodiversity they sustain.
- » Excessive clearing of vegetation can and will influence runoff and stormwater flow patterns and dynamics, which could cause excessive accelerated erosion of plains, and this could also have detrimental effects on the downslope freshwater resource systems.
 - o Rehabilitation and revegetation of all surfaces disturbed or altered during construction is desirable.
 - o Runoff from sealed surfaces or surfaces that need to be kept clear of vegetation to facilitate operation of a development needs to be monitored regularly to ensure that erosion control and stormwater management measures are adequate to prevent the degradation of the surrounding environment.
- » Large-scale disturbance of indigenous vegetation creates a major opportunity for the establishment of invasive species and the uncontrolled spread of alien invasives into adjacent agricultural land and rangelands.
 - o A regular monitoring and eradication protocol must be part of all developments long term management plans.
- » The loss of and transformation of intact habitats could compromise the status and ecological functioning of provincially identified CBAs. Irreplaceable CBAs will be almost entirely avoided, whilst some impact will occur on Optimal CBAs and will very slightly contribute to cumulative impacts on CBAs within the region. However, the extent of impacts on these CBAs is small enough that it should not impact the conservation targets set out by the province, for these areas.

Nature: <u>Impact on Critical Biodiversity Areas and broad-scale ecological processes</u>		
Transformation of intact habitats could potentially compromise ecological processes, as well as ecological functioning of important habitats, and would contribute to the fragmentation of the landscape and potentially disrupt the connectivity of the landscape for fauna and flora, and impair their ability to respond to environmental fluctuations.		
	Overall impact of the proposed project considered in isolation	Cumulative impact of the project and other projects in the area
Extent	Local (1)	Regional (4)
Duration	Permanent (5)	Permanent (5)
Magnitude	Minor (2)	Small (4)
Probability	Improbable (2)	Probable (3)
Significance	Low (16)	Medium (39)

Status (positive or negative)	Negative	Negative
Reversibility	Moderate	Moderate
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Yes	

Mitigation:

- » The development footprint should be kept to a minimum and natural vegetation should be encouraged to return to disturbed areas.
- » An open space management plan should be developed for the site, which should include management of biodiversity within the fenced area, as well as that in the adjacent rangeland.
- » Reduce the footprint within sensitive habitat types as much as possible.
- » All disturbed areas that are not used, such as excess road widths, should be rehabilitated with locally occurring plant species after construction to reduce the overall footprint of the development.

Nature: Cumulative loss of natural grassland and wetland/watercourse habitats (associated with Soweto Highveld Grassland)

The ecosystem has been classified as Endangered with a conservation target of 24%. Currently only 0.2% is conserved (statutorily or other reserves) whilst 52.7% of the ecosystem have already been transformed.

Cumulative loss of natural Soweto Highveld Grassland and further increase in the fractured nature of the landscape may lead to the loss of features responsible for maintaining biodiversity and providing ecosystem goods and services and may potentially lead to;

- » A change in the status of the Grassland, subsequently also reducing the ability to meet national conservation obligations and targets;
- » A reduction in biodiversity and even the loss of some species from the area;
- » Fracturing and isolation of landscapes may cut off important migration routes and prevent genetic variability, thus reducing "genetic health", which may in turn lead to weaker species incapable to adapt and react to potential environmental changes, and consequently also to a reduction in biodiversity and the extinction of some species from certain areas.
- » The loss of important corridors essential for some species to allow for movement between important habitat types crucial for the survival of these species.

	Overall impact of the proposed project considered in isolation	Cumulative impact of the project and other projects in the area
Extent	Local (1)	Regional (4)
Duration	Permanent (5)	Permanent (5)
Magnitude	Minor (2)	Small (4)
Probability	Improbable (2)	Improbable (2)
Significance	Low (16)	Low (26)
Status (positive or negative)	Negative	Negative
Reversibility	Moderate	Moderate
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Yes	

Mitigation:

- » The development footprint should be kept to a minimum and natural vegetation should be encouraged to return to disturbed areas.
- » An open space management plan should be developed for the site, which should include management of biodiversity within the fenced area, as well as in the adjacent rangeland.
- » Reduce the footprint of the facility within sensitive habitat types as much as possible.
- » All disturbed areas that are not used, such as excess road widths, should be rehabilitated with locally occurring grasses after construction to reduce the overall footprint of the development.

- » Small to medium sized mammals can be allowed to move between the development area and surrounding areas by creating artificial passageways underneath boundary fences (this is optional and may be implemented by developer if deemed necessary).

9.4 Cumulative Impacts on Freshwater Ecology

The grid connection infrastructure is part of the Umbila Emoyeni Renewable Energy Facility. There are also other approved REFs in the area, and which contain their own grid connection infrastructure. From a cumulative perspective, these grid connection infrastructures, have very limited impacts on local and regional freshwater resource features due to their narrow linear and relatively small footprints as well as the fact that most of these infrastructures are located outside of fresh water resource features and tend to be located in close proximity to one another, limiting the impact area and allowing for sharing of access/service roads.

A few existing power lines traverse the broader area, furthermore, the following existing renewable energy projects (and associated transmission infrastructure) were considered in terms of their potential cumulative terrestrial ecological impacts (located within a 30 km radius of the Umbila EGI).

Apart from the planned Umbila renewable energy projects (three PV solar facilities and one wind energy facility), only three other renewable facilities are located within the 30 km radius namely:

- » The proposed 9.5 MW Forzando North Coal Mine PV Solar Facility to the north; and
- » the 95.9 MW Tutuka PV Solar Facility to the west; and
- » the proposed 200 MW Hendrina South WEF

Of the proposed renewable energy facilities, all except for the 9.5MW Forzando North Coal Mine PV Solar Facility and the Hendrina South WEF, are located within the Upper Vaal Water Management Area. Subsequently, the Forzando PV facility as well as the Hendrina South WEF will be excluded from the cumulative assessment.

The proposed Umbila WEF, Umbila Solar PV Projects as well as the Umbila EGI and a few existing power lines are located within Kwaggalaagt River's catchment which is an important tributary of the Blesbokspruit River. Subsequently these developments are likely to have a cumulative impact on this important freshwater resource feature as well as the wetland features associated with this river. The Tukuta PV facility is located within a separate quaternary catchment, with the Leeuspruit River being the primary drainage feature. As such this PV facility can also be excluded from the proposed cumulative impact assessment.

Based on the proposed location of the Umbila Solar PV facilities as well as the Umbila WEF's turbine locations, no freshwater resource features will be directly impacted by the mentioned infrastructure as the infrastructure are located well outside of any freshwater resource features as well as their recommended buffer areas.

Subsequently, the most significant potential impact associated with the Umbila Emoyeni Renewable Energy project are as a result of the associated infrastructure, most notably access roads and watercourse/wetland crossings. The potential contribution of watercourse/wetland road crossings to cumulative impacts on freshwater resource features within the region can be significantly reduced through effective mitigation measures.

Subsequently it can be concluded that the cumulative impact of the proposed project would not be significant provided mitigation measures are implemented.

Nature: <i>Impact ecological processes as well as ecological functioning of important freshwater/wetland habitats associated with the Kwaggaspruit and Blesbokspruit</i>		
Transformation of intact freshwater resource habitats could potentially compromise ecological processes as well as ecological functioning of important habitats and would contribute to habitat fragmentation and potential disruption of habitat connectivity and furthermore impair their ability to respond to environmental fluctuations. This is especially of relevance for larger watercourses and wetlands serving as important groundwater recharge and floodwater attenuation zones, important microhabitats for various organisms and important corridor zones for faunal movement.		
	Overall impact of the proposed project considered in isolation (post mitigation)	Cumulative impact of the project and other projects in the area (post mitigation)
Extent	Local (2)	Local (2)
Duration	Long Term (4)	Long Term (4)
Magnitude	Small (2)	Minor (4)
Probability	Improbable (2)	Improbable (2)
Significance	Low (16)	Low (20)
Status (positive or negative)	Negative	Negative
Reversibility	Moderate to Low	Moderate to Low
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Yes	
Mitigation:		
<ul style="list-style-type: none"> » Existing crossings should be utilized/upgraded » The construction of new crossings may only be considered where no other viable option exists. » Where new water course crossings are required, the engineering team must provide an effective means to minimise the potential upstream and downstream effects of sedimentation and erosion (erosion protection) as well minimise the loss of riparian vegetation (reduce footprint as much as possible). » All crossings over watercourses/wetlands should be such that the flow within the channels is not impeded and should be constructed perpendicular to the river channel, » Where new roads need to be constructed, the existing road infrastructure should be rationalised and any unnecessary roads decommissioned and rehabilitated to reduce the disturbance of the area within the river beds. » During the construction and operation /decommissioning phases, monitor culverts to see if erosion issues arise and if any erosion control is required. » Where possible culvert bases must be placed as close as possible with natural levels in mind so that these don't from additional steps / barriers. » Vegetation clearing should occur in a phased manner to minimise erosion and/or run-off. » Any areas disturbed during the construction phase should be encouraged to rehabilitate as fast and effective as possible and were deemed necessary by the ECO or Contractor's EO, artificial rehabilitation (e.g. re-seeding with collected or commercial indigenous seed mixes) should be applied in order to speed up the rehabilitation process in critical areas (e.g. steep slopes and unstable soils). » All alien plant re-growth must be monitored and should it occur these plants should be eradicated. » During decommissioning, disturbance to the freshwater ecosystems should be limited as far as possible. » Disturbed areas may need to be rehabilitated and revegetated. » Mitigation and follow up monitoring of residual impacts (alien vegetation growth and erosion) may be required. 		

9.5 Cumulative Impacts on Avifauna

Other than the Tutuka and Majuba power stations, the remaining area is largely dominated by commercial agricultural activity. It is unlikely that the proposed development will contribute significantly to the cumulative

impact in the area beyond those impacts already assessed. The highest potential impacts prior to mitigation would relate to the effects on aquatic habitats, such as possible contamination and uncontrolled runoff from hard surfaces that may result in erosion and subsequent degradation of wetlands. However, highly effective mitigation measures exist to address these impacts.

The highest potential impacts following the implementation of mitigation measures relate to the direct destruction of habitat (primarily during the construction phase).

Nature: <i>The cumulative impact of the proposed development in context of the land-use activities found in the broader local area</i>		
	Overall impact of the proposed project considered in isolation (post mitigation)	Cumulative impact of the project and other projects in the area (post mitigation)
Extent	Local (2)	Footprint (1)
Duration	Long-term (4)	Short-term (2)
Magnitude	High (8)	Minor (2)
Probability	Definite (5)	Definite (5)
Significance	High (70)	Medium (35)
Status (positive or negative)	Negative	Negative
Reversibility	Difficult	Yes
Irreplaceable loss of resources?	Yes	No
Can impacts be mitigated?	Very Effectively.	Partially
Mitigation:		
<ul style="list-style-type: none"> » Infrastructure to avoid Very High Sensitivity areas, linear infrastructure (including roads) permitted. » The footprint within Medium Sensitivity areas should be minimized and avoided wherever possible. » Pre-construction walk-through of the approved development footprint must be undertaken to ensure that sensitive habitats and species are avoided wherever possible. » Laydown and other temporary infrastructure to be placed within Low sensitivity areas, preferably previously transformed areas, wherever possible. » Appropriate run-off and erosion control measures are to be implemented where required. » A site-specific environmental management programme (EMPr) must be implemented, which gives appropriate and detailed description of how construction activities must be conducted to reduce unnecessary destruction of habitat (e.g. no open fires outside of designated areas). » All contractors are to adhere to the EMPr and should apply good environmental practice during construction. » All hazardous materials should be stored in the appropriate manner to prevent contamination of the site and downstream environments. Any accidental chemical, fuel and oil spills that occur at the site should be cleared as appropriate for the nature of the spill. » Existing roads and farm tracks should be used where possible. » The minimum footprint areas of infrastructure should be used wherever possible, including road widths and lengths. » No off-road driving should be permitted in areas not identified for clearing. » An Environmental Site Officer (ESO) must form part of the on-site team to ensure that the EMPr is implemented and enforced and an Environmental Control Officer (ECO) must be appointed to oversee the implementation activities and monitor compliance for the duration of the construction phase. » Following construction, rehabilitation of areas disturbed by temporary laydown areas and facilities must be undertaken. 		

9.6 Cumulative Impacts on Bats

For the purposes of the cumulative impact assessment, cumulative impacts are defined as the total impacts resulting from the successive, incremental, and/or combined effects of a project when added to other existing, planned and/or reasonably anticipated future projects, as well as background pressures. The project

considered here is the Umbila Emoyeni Renewable Energy Facility, consisting of wind turbines, solar PV panels and the infrastructure needed to connect these technologies to the distribution and transmission grid. The goal of this assessment was to evaluate the potential resulting impact to the vulnerability and/or risk to the sustainability of the bat species affected.

Rodhouse et al. (2019), Davy et al. (2020) and Frick et al. (2017) have all shown that in North America, Least Concern bats may be experiencing impacts due to grid infrastructure that could result in changes to their conservation status. This may be a future scenario for widespread, common Least Concern bats species in South Africa. As such, the significance of cumulative impacts is assessed as High, especially for Natal long-fingered bat as it is possible that the project will result in an unacceptable loss to local bat populations.

Nature: <i>Unacceptable loss to local bat populations</i>		
	Overall impact of the proposed project considered in isolation (post mitigation)	Cumulative impact of the project and other projects in the area (post mitigation)
Extent	Site (1)	Regional (5)
Duration	Long-term (4)	Long-term (4)
Magnitude	Moderate (6)	High (9)
Probability	Probable (3)	Highly Probable (4)
Significance	Medium (33)	High (72)
Status (positive or negative)	Negative	Negative
Reversibility	High	High
Irreplaceable loss of resources?	Yes	Yes
Can impacts be mitigated?	Yes	Yes
Confidence in findings	Medium	
Mitigation:		
» No placement of grid infrastructure within 200m of key habitat features specifically including tree clumps, buildings, dams/wetlands, and rivers/streams to reduce spatial overlap between bats and power lines.		

9.7 Cumulative Impacts on Soils and Agricultural Potential

The cumulative impacts have been scored "Low," indicating that the potential incremental, interactive, sequential, and synergistic cumulative impacts. It is probable that the impact will result in spatial and temporal cumulative change.

Nature: <i>Loss of land capability</i>		
	Overall impact of the proposed project considered in isolation (post mitigation)	Cumulative impact of the project and other projects in the area (post mitigation)
Extent	Very low (1)	Local (2)
Duration	Very short Term (1)	Short Term (2)
Magnitude	Minor (2)	Low (4)
Probability	Improbable (2)	Probable (3)
Significance	Low (8)	Low (24)
Status (positive or negative)	Negative	Negative
Reversibility	High	High
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Yes	

Confidence in findings	High
<p>Mitigation:</p> <ul style="list-style-type: none"> » Avoidance of all high agricultural production land and other actively cultivated areas. Where avoidance is not feasible, stakeholder engagement should occur to compensate affected landowners. » Make use of existing roads or upgrades tracks before new roads are constructed. The number and width of internal access routes must be kept to a minimum. » A stormwater management plan must be implemented for the development. The plan must provide input into the road network and management measures. » Rehabilitation of the area must be initiated from the onset of the project. Soil stripped from infrastructure placement can be used for rehabilitation efforts. » An alien invasive plant species and control programme must be implemented from the onset of the project. » Prevent any spills from occurring. Machines must be parked within hard park areas and must be checked daily for fluid leaks. » All excess soil (soil that are stripped and stockpiled to make way for foundations) must be stored, continuously rehabilitated to be used for rehabilitation of eroded areas. » If a spill occurs, it is to be cleaned up immediately and reported to the appropriate authorities. » Restore vegetation cover by means of revegetating indigenous grass species. Mixed stands or monocultures will work sufficiently for revegetation purposes. Mixed stands tend to blend in with indigenous vegetation species and are more natural. Monocultures however could achieve high productivity. In general, indigenous vegetation should always be preferred due to various reasons including the aesthetical presence thereof as well as the ability of the species to adapt to its surroundings. » All areas outside of the footprint areas that will be degraded (by means of vehicles, laydown yards etc.) must be ripped where compaction has taken place. According to the Department of Primary Industries and Regional Development, ripping tines must penetrate to just below the compacted horizons (approximately 300 – 400mm) with soil moisture being imminent to the success of ripping. Ripping must take place within 1-3 days after seeding, and also following a rain event to ensure a higher moisture content. To summarise: <ul style="list-style-type: none"> o Rip all compacted areas outside of the developed areas that have been compacted. o This must be done by means of a commercial ripper that has at least two rows of tines. o Ripping must take place between 1 and 3 days after seeding and following a rainfall event (seeding must therefore be carried out directly after a rainfall event). Plant phase plants which are characterised by fast growing and rapid spreading conditions. Seed germination, seed density and seed size are key aspects to consider before implementing revegetation activities. The number of seed should be limited to ensure that competition between plants is kept to a minimum. During the establishment of seed density, the percentage of seed germination should be taken into consideration. <i>E curvula</i> is one of the species recommended due to the ease of which it germinates. This species is also easily sown by means of hand propagation and hydro seeding. The following species are recommended for rehabilitation purposes: <ul style="list-style-type: none"> * <i>Eragrostis teff</i>; * <i>Cynodon species (Indigenous and altered types)</i>; * <i>Chloris gayana</i>; * <i>Panicum maximum</i>; * <i>Digitaria eriantha</i>; * <i>Anthephora pubescens</i>; and * <i>Cenchrus ciliaris</i>. 	

9.8 Cumulative Impacts on Heritage (cultural landscape)

The proposed project will result in localised loss of rural landscape. However, it will not change the character of the broader landscape that is generally composed of islands of large-scale industrial operations surrounded by extensive rural areas.

At this stage, there is the potential for the cumulative impact of proposed renewable energy facilities to negatively impact the cultural landscape due to a change in the landscape character from natural wilderness and rural to semi-industrial.

To address concerns about the cumulative impact of renewable energy facilities within the greater region, a cautious approach is required in terms of assessing the desirability of such development from a cultural landscape perspective. The placement of renewable energy facilities must take cognisance of the very high visual impact on a relatively intact and representative cultural landscape, and the extremely limited ability to visually screen this infrastructural development.

Nature: <i>Cumulative impact to cultural landscape</i>		
	Overall impact of the proposed project considered in isolation (post mitigation)	Cumulative impact of the project and other projects in the area (post mitigation)
Extent	Local (1)	Local (1)
Duration	Medium-term (3)	Long-term (4)
Magnitude	High (8)	High (8)
Probability	Probable (3)	Probable (3)
Significance	Medium (36)	Medium (39)
Status (positive or negative)	Negative	Negative
Reversibility	High	Low
Irreplaceable loss of resources?	Possible	Possible
Can impacts be mitigated?	N/A	N/A
Confidence in findings	High	
Mitigation:		
» Implementation of recommended no development buffers along major routes.		

9.9 Cumulative Visual Impacts

The landscape of the region can largely be described as a rural agricultural landscape within which there are large and relatively isolated industrial developments that are visible over a large area. The rural landscape generally extends to the property boundary within which the industrial elements are located meaning that there is generally no transition.

Examples of these industrial developments within 30km of the proposed EGI include the Tutuka Power Station which is approximately 28km from the proposed EGI and large-scale mining operations.

The SASOL refinery at Secunda is also located just outside 30km from the proposed EGI.

The cumulative contribution to the impact of electrical infrastructure in the region was assessed as low.

Nature: <i>General cumulative change in the character and sense of place of the landscape setting</i>
Although there are several low voltage power lines supported by wooden poles, the site area is relatively free of power lines and other electrical infrastructure. The exception to this is the area where the Camden / Sol 2 400kV and the Camden / Tutuka 1 400kV power lines cross the site. However, due to the topography these powerlines are largely hidden from surrounding areas. They only become highly obvious as they cross ridgelines.

The proposed MTS and 400kV loop in / loop out power lines will exacerbate the impact of HV power lines in the area. However, as they are so close to the existing lines, they are unlikely to extend the existing area of impact. The introduction of the new 132kV power lines will add to the sight of electrical infrastructure in the landscape however, this will only affect the site area. Given the possible development of renewable energy projects within the site, this is likely to be seen as in keeping with the overall development.

In the vicinity of the existing 400kV powerlines, the proposed on-site substations and 400kV loop in / loop out overhead power lines will impact an area that is currently impacted by major electrical infrastructure. These facilities will therefore not extend the visual influence of industry, but will intensify if within a relatively small area.

The proposed 132kV power lines will however extend the influence of electrical infrastructure within the proposed site area. However this will only affect areas that are likely to be influenced by renewable energy infrastructure.

There is also another WEF project (Hendrina) that is proposed approximately 25km to the north of the Umbila WEF. At the time of reporting it is understood that application documents have just been submitted to the Competent Authority for this project.

In terms of cumulative effects, this project will result in additional new grid connection infrastructure being developed. In addition to the Hendrina project, large scale electrical infrastructure is likely to be obvious in and around the other major industrial projects in the region including Tutuka Power Station. Therefore, the proposed project could increase regional perceptions, however, because impacts are largely limited to the site area, this effect is also likely to be minimal.

	Overall impact of the proposed project considered in isolation	Cumulative impact of the project and other projects in the area
Extent	Site and immediate surrounding area, (2)	Region (3)
Duration	Long term (4)	Long term (4)
Magnitude	Minor to Low, (3)	Low to Moderate, (8)
Probability	Improbable, (2)	Definite (5)
Significance	Low (18)	High (75)
Status (positive or negative)	Neutral to Negative	Negative
Reversibility	Medium	Low
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Yes, possible mitigation will not change the level of significance	N/A

Mitigation:

Planning:

- » Ensure that the grid connection infrastructure are located outside sensitive areas.

Operations:

- » Maintain current agricultural land uses.

Decommissioning:

- » Remove infrastructure not required for the post-decommissioning use of the site.

Rehabilitate and monitor areas for vegetation cover post-decommissioning and implement remedial actions

Nature: Cumulative impact on views from Silver Water Private Nature Reserve.

The proposed grid connection infrastructure is unlikely to be visible from Silver Water. Other major regional electrical infrastructure is also not visible.

The project is therefore unlikely to influence cumulative impacts on Silver Water.

	Overall impact of the proposed project considered in isolation	Cumulative impact of the project and other industrial development in the area

Extent	Local (1)	Site and immediate surroundings (2)
Duration	Long term (4)	Long term (4)
Magnitude	Small (0)	Small (0)
Probability	Very improbable (1)	Very improbable (1)
Significance	Low (5)	Low (6)
Status (positive or negative)	Neutral	Neutral
Reversibility	High	Low
Irreplaceable loss of resources?	No irreplaceable loss.	No irreplaceable loss.
Can impacts be mitigated?	Yes, possible mitigation will not change the level of significance.	Unknown
<p>Mitigation: <u>Planning:</u> » Minimise disturbance of the land beneath the grid connection infrastructure layout to ensure that associated infrastructure is sited in such a way that it minimises visual impact. <u>Operations:</u> » Maintain current agricultural land uses. <u>Decommissioning:</u> » Remove infrastructure not required for the post-decommissioning use of the site. » Rehabilitate and monitor areas for vegetation cover post-decommissioning and implement remedial actions.</p>		

<p>Nature: <i>Cumulative impact on views from Main Roads.</i></p> <p>The proposed grid connection infrastructure is unlikely to be obvious from major roads. Whilst the majority of the region is not affected, major electrical infrastructure associated with other large projects in the region particularly the Tutuka Power Station is likely to be significantly more obvious. The proposed infrastructure is therefore likely to have a low contribution to a Medium level cumulative regional impact.</p>		
	Overall impact of the proposed project considered in isolation	Cumulative impact of the project and other industrial development in the area
Extent	Site and immediate surroundings, (2)	Region (3)
Duration	Long term (4)	Long term (4)
Magnitude	Minor, (2)	Low (4)
Probability	Improbable (2)	Probable (3)
Significance	Low (16)	Medium (33)
Status (positive or negative)	\ Neutral	Negative
Reversibility	High	Low
Irreplaceable loss of resources?	No irreplaceable loss.	No irreplaceable loss.
Can impacts be mitigated?	Yes, possible mitigation will not change the level of significance.	
<p>Mitigation: <u>Planning:</u> » Minimise disturbance of the land beneath the grid connection infrastructure layout to ensure that associated infrastructure is sited in such a way that it minimises visual impact. <u>Operations:</u> » Maintain current agricultural land uses. <u>Decommissioning:</u> » Remove infrastructure not required for the post-decommissioning use of the site. » Rehabilitate and monitor areas for vegetation cover post-decommissioning and implement remedial actions.</p>		

Nature: Cumulative impact on Minor Roads.

The proposed grid connection infrastructure will affect minor roads within the site area. However, their sensitivity is relatively low.

Whilst the majority of the region is not affected, major electrical infrastructure associated with other large projects in the region particularly the Tutuka Power Station is also likely to affect views from other minor roads in the region. The proposed infrastructure is therefore likely to have a low contribution to a Medium level cumulative regional impact.

	Overall impact of the proposed project considered in isolation	Cumulative impact of the project and other projects in the area
Extent	Local, (2)	Region (3)
Duration	Long term (4)	Long term (4)
Magnitude	Minor to Low, (3)	Low (4)
Probability	Improbable (2)	Probable (3)
Significance	Low (18)	Medium (33)
Status (positive or negative)	Negative	Negative
Reversibility	High	Low
Irreplaceable loss of resources?	No irreplaceable loss	Yes
Can impacts be mitigated?	Yes	Unknown

Mitigation:

Planning:

- » Minimise disturbance of the land beneath the grid connection infrastructure layout to ensure that associated infrastructure is sited in such a way that it minimises visual impact.

Operations:

- » Maintain current agricultural land uses.

Decommissioning:

- » Remove infrastructure not required for the post-decommissioning use of the site.
- » Rehabilitate and monitor areas for vegetation cover post-decommissioning and implement remedial actions.

Nature: Cumulative impact on local homesteads

Visual impacts of the proposed infrastructure on homesteads were assessed as having a low significance. The proposed project is therefore unlikely to contribute significantly to cumulative visual impacts on homesteads.

Because views of major electrical infrastructure are likely to be obvious from all homesteads in the area the impact is assessed as high.

	Overall impact of the proposed project considered in isolation	Cumulative impact of the project and other projects in the area
Extent	Local, (2)	Region (3)
Duration	Long term (4)	Long term (4)
Magnitude	Minor to Low, (3)	Moderate (6)
Probability	Improbable (2)	Definite (5)
Significance	Low (18)	High (65)
Status (positive or negative)	Neutral - Negative	Negative
Reversibility	High	Low
Irreplaceable loss of resources?	No irreplaceable loss	No irreplaceable loss
Can impacts be mitigated?	Yes	Unknown

Mitigation:

Planning:

- » Minimise disturbance of the land beneath the grid connection infrastructure layout to ensure that associated infrastructure is sited in such a way that it minimises visual impact.

Operations:

- » Maintain current agricultural land uses.

Decommissioning:

- » Remove infrastructure not required for the post-decommissioning use of the site.
- » Rehabilitate and monitor areas for vegetation cover post-decommissioning and implement remedial actions.

Nature: Lighting impacts

Lighting patterns currently include:

- » Relatively brightly lit urban areas;
- » Low level lighting within rural areas; and
- » Brightly lit areas of industrial activity.

With mitigation the renewable energy project associated with the proposed infrastructure should, under normal circumstances, result in a low level of lighting similar to surrounding rural areas as should the infrastructure project.

The proposed infrastructure project should therefore not exacerbate the extent of brightly lit sections of the landscape. It will therefore result in a small contribution to a general high cumulative impact.

	Overall impact of the proposed project considered in isolation	Cumulative impact of the project and other projects in the area
Extent	Local (2)	Region (3)
Duration	Long term (4)	Long term (4)
Magnitude	Small, (0)	Moderate to High (7)
Probability	Improbable (2)	Definite (5)
Significance	Low (12)	High (70)
Status (positive or negative)	Neutral	Negative
Reversibility	High	Low
Irreplaceable loss of resources?	No irreplaceable loss	No irreplaceable loss
Can impacts be mitigated?	Yes	Unknown

Mitigation:

Planning:

- » Careful design of security and operational lighting.
- » Ensure that operational lighting is only activated, when necessary, the splitting of circuits and use of movement sensors should be considered.
- » Ensure that security lighting is only activated, when necessary, the use of movement sensors and / or infra-red systems should be considered.
- » No high mast lighting should be used.

Operation:

- » Ensure that the intention of the original lighting design is maintained throughout the operational phase.

Decommissioning:

- » Ensure that all lighting facilities are removed.

9.10 Cumulative Socio-Economic Impacts

Other known authorised renewable energy facilities have been identified that will create the conditions for cumulative effect, namely Majuba Solar PV Facility, Tutuka Solar PV Facility, the Hendrina Renewable Energy

Cluster, and Forzando North Coal Mine PV Facility. Only cumulative impacts that will have the potential for a significant influence are analysed:

- » Increase in production - The initial investment spend on the project will inject significant business sales/ production for the local and regional economy. The economic impact arising from the initial investment will be felt throughout the economy with windfall effects benefitting related sectors in the economy.
- » Employment creation - Increase in employment creation for the local workforce.
- » Demographic shifts - Influx of migrant labour and job seekers due to job opportunities presented by numerous projects.

In addition to the negative cumulative impact noted above (i.e., demographic shifts), numerous positive impacts are expected to accumulate in the region such as increased production, GDP, employment, skills and household income.

The following tables summarise and rate the expected cumulative effects.

Nature: <i>Increase in economic production</i>		
	Cumulative Contribution of proposed project	Cumulative Impact without proposed project
Extent	Regional (3)	Regional (3)
Duration	Long term (4)	Long term (4)
Magnitude	High (8)	High (8)
Probability	Probable (3)	Probable (3)
Significance	Medium (45)	Medium (45)
Status (positive or negative)	Positive	Positive
Reversibility	Low	Low
Irreplaceable loss of resources?	No	No
Can impacts be enhanced?	Yes	Yes
Confidence in findings	High	
Enhancement:		
» No enhancement measures are required.		

Nature: <i>Increase in the number of employment opportunities</i>		
	Cumulative Contribution of proposed project	Cumulative Impact without proposed project
Extent	Regional (3)	Regional (3)
Duration	Long term (4)	Long term (4)
Magnitude	High (8)	High (8)
Probability	Probable (3)	Probable (3)
Significance	Medium (45)	Medium (45)
Status (positive or negative)	Positive	Positive
Reversibility	Low	Low
Irreplaceable loss of resources?	No	No
Can impacts be enhanced?	Yes	Yes
Confidence in findings	High	

Enhancement:

- » Employment of local residents as far as possible should be encouraged.

Nature: *Influx of migrant labour and job seekers due to job opportunities presented by numerous projects*

	Cumulative Contribution of proposed project	Cumulative Impact without proposed project
Extent	Regional (3)	Regional (3)
Duration	Medium term (3)	Medium term (3)
Magnitude	Moderate (6)	Moderate (6)
Probability	Highly probable (4)	Highly probable (4)
Significance	Medium (48)	Medium (48)
Status (positive or negative)	Negative	Negative
Reversibility	Medium	Low
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Yes	
Confidence in findings	High	

Mitigation:

- » Where feasible, effort must be made to employ local labour in order to create maximum benefit for the communities and limit in-migration.
- » Provide training for unemployed local community members with insufficient skills and thus increase absorption of local labour thereby decreasing in-migration.
- » Manage recruitment and marketing for vacancies with a preference of residents within the municipality.

9.11 Cumulative Traffic Impacts

To assess the cumulative impact, it was assumed that all renewable energy projects within 30km currently proposed and authorized would be constructed at the same time. This is the precautionary approach as in reality these projects would be subject to a highly competitive bidding process. Only a handful of projects would be selected to enter into a power purchase agreement with Eskom or private offtaker, and construction is likely to be staggered depending on project-specific issues.

The construction and decommissioning phases are the only significant traffic generators for renewable energy projects. The duration of these phases is short term (i.e., the impact of the generated traffic on the surrounding road network is temporary and renewable energy facilities, when operational, do not add any significant traffic to the road network). Even if all renewable energy projects within the area are constructed at the same time, the roads authority will consider all applications for abnormal loads and work with all project companies to ensure that loads on the public roads are staggered and staged to ensure that the impact will be acceptable.

Nature: Traffic generated by the proposed development and the associated noise and dust pollution. Traffic congestion and associated noise and dust pollution possible along the N17, R35, R39 and the existing gravel road network, depending on the main access route selected

	Cumulative Contribution of proposed project	Cumulative Impact without proposed project
Extent	Local (2)	High (5)
Duration	Short-term (2)	Medium-term (3)
Magnitude	Low (2)	High (8)

Probability	Probable (3)	Improbable (2)
Significance	Low (18)	Medium (32)
Status (positive or negative)	Negative	Negative
Reversibility	High	High
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	Yes	Yes
Confidence in findings	High	
Mitigation:		
<ul style="list-style-type: none"> » Stagger component delivery to site. » Undertake dust suppression. » Reduce the construction period. » The use of mobile batch plants and quarries in close proximity to the site must be considered. » Staff and general trips should occur outside the peak traffic periods. » Should routes approaching the proposed site from the south be considered, further investigations would be required to ascertain if the bridges/watercourse crossings on the gravel roads could accommodate heavy and abnormal load vehicle., the bridges will need to be investigated for load bearing and width. 		

9.12 Conclusion Regarding Cumulative Impacts

Cumulative impacts are expected to occur with the development of the Umbila Emoyeni EGI throughout all phases of the project life cycle and within all areas of study considered as part of this EIA report. The main aim for the assessment of cumulative impacts considering the Umbila Emoyeni EGI is to test and determine whether the development will be acceptable within the landscape proposed for the development, and whether the loss, from an environmental and social perspective, will be acceptable without whole-scale change.

The following conclusions can be drawn regarding the cumulative impacts associated with the project:

- » There will be no unacceptable loss or impact on ecological aspects (vegetation types, species and ecological processes) due to the development of the Umbila Emoyeni EGI and other renewable energy projects within the surrounding area, provided the recommended mitigation measures are implemented. The cumulative impact is therefore acceptable.
- » There will be no significant loss of sensitive and significant aquatic features. The cumulative impact is therefore acceptable.
- » There will be no unacceptable risk to avifauna with the development of the Umbila Emoyeni EGI and other renewable energy projects within the surrounding area, provided the recommended mitigation measures are implemented. This is due to the limited footprint expected to be associated with the renewable energy facilities proposed in authorised in the area. The cumulative impact is therefore acceptable.
- » There will be no unacceptable loss of bat species as a result of the grid connection infrastructure. The significance of cumulative impacts is however assessed as High when considering the larger cluster (wind, solar and EGI), especially for Natal long-fingered bat as it is possible that the project will result in an unacceptable loss to local bat populations.
- » The cumulative impact from a land capability perspective has been scored low, indicating the potential for incremental, interactive, sequential, and synergistic cumulative impacts.
- » Change to the sense of place and character of the area is expected with the development of the proposed Umbila Emoyeni EGI and renewable energy facilities within a 30km radius of the site. Other

large scale industrial operations including mining operations and power stations are relatively obvious in the region. Whilst the proposed project will create a new large scale industrial operation and change the character of an area of rural landscape, this is not entirely out of character with the region. The cumulative impact is therefore considered to be acceptable.

- » There will be no unacceptable loss of heritage resources associated with the development of the Umbila Emoyeni EGI. There will also be no unacceptable impacts to the cultural landscape as a result of the development of the facility provided that the recommended development buffers along major routes are adhered to. The cumulative impact is therefore acceptable.
- » No unacceptable social impacts are expected to occur. Two positive cumulative impacts are expected to occur from a social perspective (i.e., increase in production and employment opportunities). These impacts will be of medium significance. Positive cumulative impacts are expected to be beneficial at a regional level. The cumulative impact is therefore acceptable.
- » No unacceptable traffic impacts are expected to occur. The cumulative impact is therefore acceptable.

The cumulative impacts associated with the Umbila Emoyeni EGI will be of a low significance, medium and high significance, with impacts of a high significance associated with the visual impacts and the positive impacts on the socio-economic environment. A summary of the cumulative impacts is included in **Table 9.3** below.

Table 9.3: Summary of the cumulative impact significance for the Umbila Emoyeni EGI

Specialist assessment	Overall significance of impact of the proposed project considered in isolation	Cumulative significance of impact of the project and other projects in the area
Terrestrial Ecology	Low	Low and Medium
Freshwater Ecology	Low	Low
Avifauna	High	Medium
Bats	Medium	High
Soils and Agricultural Potential	Low	Low
Heritage (including archaeology, palaeontology and sense of place)	Medium	Medium
Visual	Low	Low to High
Socio-Economic	Positive impacts: Medium	Positive impacts: Medium
	Negative impacts: Medium	Negative impacts: Medium
Traffic	Low	Medium (assuming all projects in the area are constructed at the same time)

Based on the specialist cumulative assessment and findings, the development of the Umbila Emoyeni EGI and its contribution to the overall impact of all renewable energy projects to be developed within a 30km radius, it can be concluded that the Umbila Emoyeni EGI cumulative impacts will be of low, medium and high significance, with impacts of a high significance mainly relating to visual impacts and the positive impacts on the socio-economic environment. Based on all other areas of study considered as part of this EIA report, the development of the Umbila Emoyeni EGI will not result in unacceptable, high cumulative impacts and will not result in a whole-scale change of the environment.

CHAPTER 10: CONCLUSIONS AND RECOMMENDATIONS

Emoyeni Renewable Energy Farm (Pty) Ltd is proposing the development of grid connection infrastructure on a site located ~6km south-east of Bethal and 1km east of Morgenzon, within the Mpumalanga Province. The project site is located across the Govan Mbeki and Lekwa Local Municipalities within the Gert Sibande District on the following properties:

Parent Farm Number	Farm Portions
Farm 261 – Naudesfontein	15 R/E, 21
Farm 264 – Geluksplaats	0, 1, 3, 4, 5, 6 R/E, 8 R/E, 9R/E, 10, 11, 12
Farm 268 – Brak Fontein Settlement	6,7,10,11,12
Farm 420 – Rietfontein	8,9,10,11,12,15 R/E,16,18,19,22,32
Farm 421 - Sukkelaar	2, 2, 7, 9, 9 10, 10 11, 11 12, 12, 22 ,25 R/E, 34, 35, 36, 37, 37, 38, 39, 40, 42, 42
Farm 422 – Klipfontein	0, 2 R/E, 3 R/E, 4, 5, 6, 7, 8 R/E, 9, 10, 12, 13 R/E, 14 R/E, 16, 17, 18, 19, 20, 21, 22, 23
Farm 423 – Bekkerust	0 R/E, 1, 2 R/E, 4, 5 R/E, 6, 10, 11, 12, 13 14, 15, 17, 19 R/E, 20, 22, 23, 24,25
Farm 454 – Oshoek	4 R/E, 13, 18
Farm 455 – Ebenhaezer	0, 1, 2, 3
Farm 456 – Vaalbank	1, 2, 3, 4, 7, 8, 13, 15, 16, 17, 18, 19
Farm 457 – Roodekrans	0, 1, 4, 5, 7, 22, 23, 23
Farm 458 – Goedgedacht	0, 2, 3, 4, 4, 5, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 21, 21, 22, 23, 25, 26 R/E, 27, 28, 29, 31, 32, 33, 34, 35, 36, 37, 39, 41, 42, 43
Farm 467 – Twee Fontein	0 R/E, 1 R/E, 4 R/E, 5, 6, 7 R/E, 8, 10
Farm 469 – Klipkraal	5 R/E, 6, 7, 8
Farm 548 – Durabel	0
Farm 470 – Dorpsplaats	85
Farm 451 - Drinkwater	4, 22
Farm 452 - Brakfontein	5

The full extent of the project site (i.e., 27 819ha) was considered during the Scoping Phase of the EIA process in order to identify environmental sensitivities. The Umbila Emoyeni EGI has been appropriately located within this larger area from a technical and environmental sensitivity perspective (refer to **Figure 11.1**).

The 400/132kV MTS will serve as the main point of connection of the renewable energy cluster (wind and solar) and Eskom Transmission infrastructure. This IPP stations will connect to a collector substation via a 132kV line and will then connect to the MTS. This is generally an Eskom requirement in order to stop access into the MTS being constrained. The connection of the proposed 400/132kV MTS to the national grid will be via a new loop-in loop-out 400kV power line that will connect into the existing Camden-Sol 400kV transmission line. The grid connection infrastructure will include:

- » A new 400/132 kV Main Transmission Substation (MTS), to be located adjacent to the Camden SOL Overhead Lines (OHLs).
- » New collector stations: each will comprise several incoming 132 kV feeder bays connecting OHLs from the MTS, a 132kV bus bar and outgoing feeder bays to remote switching stations.
- » Two 400kV loop-in loop-out OHLs to the existing Camden-Sol 400kV transmission line.

- » On-site switching stations (132kV in capacity) at each renewable energy facility.
- » 132kV power lines from the switching stations to the collector substations and ultimately to a new MTS.
- » On-site IPP substations where the generated power will be transformed from 33 kV to 132 kV so it can be evacuated to the switching stations and from there to the Collector station and MTS
- » Access roads up to 8m wide.

Emoyeni Renewable Energy Farm (Pty) Ltd has confirmed that the project site is suitable for grid connection infrastructure from a technical perspective due to easy access, compatibility with the current land use and land availability. Furthermore, Eskom has confirmed the feasibility of the location of the MTS between Camden and Sol Substations within the CEL issued to the applicant.

A summary of the recommendations and conclusions for the proposed project is provided in this chapter.

10.1. Legal Requirements as per the EIA Regulations, 2014 (as amended), for the undertaking of an Environmental Impact Assessment Report

This chapter of the EIA Report includes the following information required in terms of Appendix 3: Scope of Assessment and Content of Environmental Impact Assessment Reports:

Requirement	Relevant Section
3(1)(k) where applicable, a summary of the findings and impact management measures identified in any specialist report complying with Appendix 6 to these Regulations and an indication as to how these findings and recommendations have been included in the final report.	A summary of the findings of the specialist studies undertaken for the Umbila Emoyeni EGI has been included in section 10.2 .
3(1)(l) an environmental impact statement which contains (i) a summary of the key findings of the environmental impact assessment, (ii) a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred development footprint on the approved site as contemplated in the accepted scoping report indicating any areas that should be avoided, including buffers and (iii) a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives.	An environmental impact statement containing the key findings of the environmental impacts of the Umbila Emoyeni EGI has been included as section 10.5 . An Environmental Sensitivity and Layout map of the Umbila Emoyeni EGI has been included as Figure 10.1 which overlays the development footprint (as assessed within the EIA) of the wind farm with the environmental sensitive features located within the development area. A summary of the positive and negative impacts associated with the Umbila Emoyeni EGI has been included in section 10.2 .
3(1)(o) any aspects which were conditional to the findings of the assessment either by the EAP or specialist which are to be included as conditions of authorisation.	All conditions required to be included in the Environmental Authorisation of the Umbila Emoyeni EGI have been included in section 10.6 .
3(q) a reasoned opinion as to whether the proposed activity should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be made in respect of that authorisation.	A reasoned opinion as to whether the Umbila Emoyeni EGI should be authorised has been included in section 10.5 .

10.2 Evaluation of the Umbila Emoyeni EGI

The preceding chapters of this report, together with the specialist studies contained within **Appendices D-L** provide a detailed assessment of the potential impacts that may result from the development of the Umbila

Emoyeni EGI. This chapter concludes the environmental assessment of the grid connection infrastructure by providing a summary of the results and conclusions of the assessment of both the project site and development footprint for the EGI. In so doing, it draws on the information gathered as part of the EIA process, the knowledge gained by the environmental specialists and the EAP and presents a combined and informed opinion of the environmental impacts associated with the project.

No environmental fatal flaws or unacceptable impacts were identified in the detailed specialist studies conducted, provided that the recommended mitigation measures are implemented. These measures include, amongst others, the avoidance of sensitive features within the development footprint.

The potential environmental impacts associated with the Umbila Emoyeni EGI assessed through the EIA process include:

- » Impacts on terrestrial ecology (flora and fauna).
- » Impacts on freshwater ecology.
- » Impacts on avifauna.
- » Impacts on bats.
- » Impacts on soils and agricultural potential.
- » Impacts on heritage resources, including archaeology, palaeontology and the cultural landscape.
- » Visual impacts on the area imposed by the components of the grid connection infrastructure
- » Positive and negative social impacts.
- » Traffic impacts.

The development footprint, as assessed in the EIA Report is presented in **Figure 10.1**.

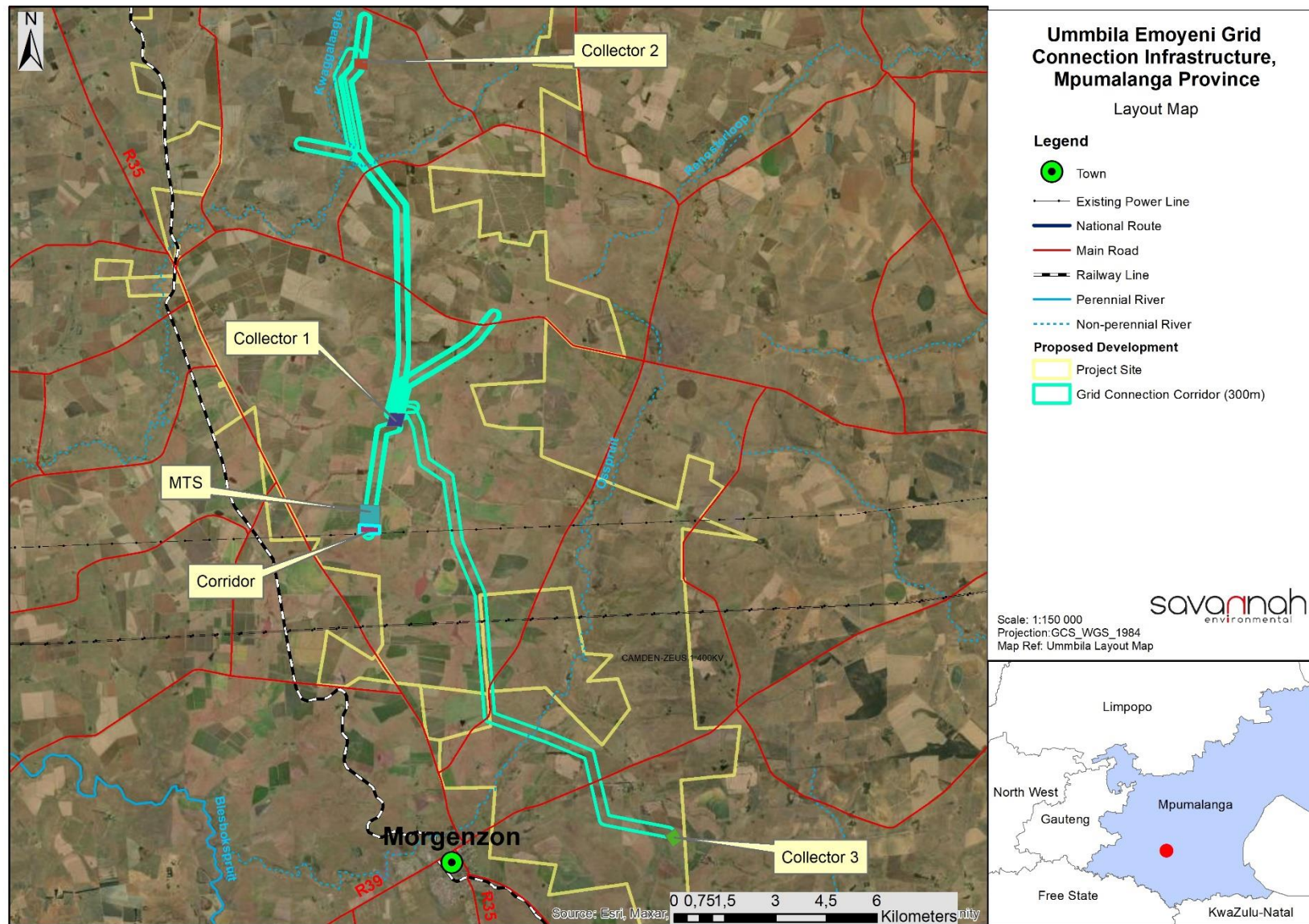


Figure 10.1: The development footprint of the Umbila Emoyeni EGI, as assessed within the EIA Report

10.2.1 Impacts on Terrestrial Ecology (including flora and fauna)

From a botanical and ecological perspective, it was found that the study area is mostly comprised of either Moderate (799.58 ha; 45%) or Low (620.56 ha; 35%) sensitivity. Various "Very High" sensitivity areas also occur throughout the study area (comprising features such as wetlands, ephemeral rivers and streams, seepages, and other drainage lines). Furthermore, various CBA and ESA areas occur throughout the study area. Development is highly discouraged within the areas classified as CBA Irreplaceable Areas and development within CBA Optimal Areas should be avoided as far as possible.

A total of 198 plant species were found within the study area, which consisted of 158 native, 0 Red List, 6 protected, 0 Mpumalanga endemic, 39 alien, and 11 NEM:BA listed invasive species.

A total of 32 mammal species, 6 amphibians and 10 reptile species were recorded within the projects site. No amphibian or reptile SCC were recorded within the project site; however, 4 mammal SCC were recorded within the project site namely; Serval (Near Threatened), Brown hyena (Near Threatened); Vlei rat (Near Threatened), Cape clawless otter (Near Threatened) and South African hedgehog (Near Threatened). It was determined that the development will not detrimentally impact these populations/individual SCC.

During this assessment it was determined that the study area contains numerous habitat variations, and include Drainage, Fallow Land, Natural Clay, Natural Dolerite, Natural Loam Soil, Natural Rock Turf, Natural Sandstone, and Disturbed areas. Each of these areas (excluding disturbed areas) have certain unique species, with drainage areas having the highest number (i.e., many of its species are not shared with the other habitats). Development should therefore not proceed within drainage areas, which are all classified as "Very High" sensitivity. Natural rock turf and natural clay areas had the lowest number of species that occurred only in those types, and development should therefore aim to occur within these habitat types, since this would minimize the loss of unique biodiversity.

Furthermore, the only substation infrastructure that will directly impact drainage/wetland areas is Collector Substation 3 as a small portion a seepage wetland is located within the footprint of this substation. It is recommended that this substation's footprint is adjusted in order to avoid any direct impacts on this seepage wetlands. All other substation infrastructure will avoid any direct impact on wetland features. Furthermore, no wetland/drainage features are located within the 400 kV LILO corridor.

There are no impacts associated with the proposed EGI development that cannot be mitigated to a low level. Its local environmental impact can be reduced to an acceptable magnitude. Likewise, the contribution of the proposed EGI to the cumulative impact in the area would be low and is acceptable. As such, there are no fatal flaws associated with the development and no terrestrial ecological considerations that should prevent it from proceeding. Therefore, it is the opinion of the specialists that the development may be authorised within the specified area, subject to the implementation of the recommended mitigation measures.

10.2.2 Impacts on Freshwater Ecology

All endorheic wetland features, wetland features that are not directly connected to the larger extensive wetland network or that have been fractured/isolated through agricultural practices are classified as High Sensitive. Even though these wetland features do not provide functions and services to the extent of the more connected and larger wetland features, these wetlands still provide some functions and services. Furthermore, most of these wetland features are fairly small and any direct impacts on these wetland

habitats may have a significant impact on the drivers of these wetland features as well as the associated biodiversity. Another feature of these wetlands is the fact that, even though small in size, they are located within relatively small catchment areas, thus these wetlands' percentage coverage in relationship to their catchments are fairly significant, making these wetland features vulnerable to catchment disturbances.

The following buffer areas are recommended and should be implemented for maintaining the freshwater resource features REC (Recommended Ecological Category) allowing the persistence of the current present ecological status as well as their functions and services.

- » A wetland buffer area of 11m from the outer edge of wetland features are recommended and should be implemented for maintaining the freshwater resource features REC (Recommended Ecological Category) allowing the persistence of the current present ecological status as well as their functions and services.
- » All freshwater features with their buffer areas have been classified as either Very High- or High sensitive and should be regarded as "No-Go" areas apart from the following activities and infrastructure which may be allowed (although restricted to an absolute minimum footprint):
 - * only activities relating to the route access and cabling:
 - the use/upgrade of existing roads and watercourse crossings are the preferred options;
 - Where no suitable existing roads and watercourse crossings exist, the construction of new access roads and watercourse crossings can be allowed, however this should be deemed as a last resort.
 - All underground cabling should be laid either within access roads or next to access roads (as close as possible).

With mitigation measures in place, impacts on the integrity and functioning of freshwater resource features can be potentially reduced to sufficiently low levels. This would be best achieved by incorporating the recommended management & mitigation measures into an Environmental Management Programme (EMPr) for the site, together with appropriate rehabilitation guidelines and ecological monitoring recommendations.

Based on the outcomes of this study it is the specialist's considered opinion that the proposed project detailed in this report could be authorised from a freshwater resource perspective.

Since there are watercourses present within the development area of the Umbila Emoyeni Solar Energy Facility as identified in the Freshwater Impact Assessment (**Appendix E**), and since water may be abstracted from boreholes for use during the construction and operational phases, a water use authorisation for the project will be required from the DWS for water uses identified in Section 21 (a), Section 21 (c) and 21 (i) of the National Water Act (Act 36 of 1998).

10.2.3 Impacts on Avifauna

Pre-construction bird monitoring was undertaken over a period of 12 months within the project area. The pre-construction bird monitoring included the identification of twelve vantage points, five drive transects, and 15 walk transects of 500m in length across the project site. A total of 102 species (5 805 birds) were recorded during the walk transects conducted across the full pre-construction bird monitoring period.

A total of 26 target species were recorded during vantage point monitoring over the pre-construction monitoring period. A total of 72 observations of 18 target species (comprising 235 birds) were recorded during 703.12km of drive transect observations.

The following sensitivities were identified from an avifaunal perspective:

- » Wetlands - Very High Avifaunal Site Ecological Importance
- » Natural Grasslands – High Avifaunal Site Ecological Importance
- » Agricultural/cultivated fields – Very Low Avifaunal Site Ecological Importance

The primary threat to these species is likely to rather be associated with the risk of collision fatalities, therefore areas and flights that appeared to represent preferred foraging or movement corridors for avifaunal SCCs were considered to have high avifaunal sensitivity. Species utilising the highly modified agricultural areas are likely resilient to disturbance and ongoing activity, including habitat modification. These areas are of low avifaunal sensitivity and are the preferred areas for development activities as well as permanent and temporary structures such as site buildings and lay-down areas. However, species utilising these areas, such as Southern Bald Ibis, remain at risk to collision when commuting to and from foraging areas.

The Avifauna Impact Assessment identified that all impacts associated with the development of the Umbila Emoyeni EGI will be of low, medium and high significance before mitigation, and can be mitigated to an acceptable level of impact (i.e., medium and low significance, depending on the impact being considered). The implementation of additional mitigation measures such as implementation of bird flappers in areas of elevated recorded passage rates will be highly effective at reducing the likelihood of collisions as large flocks of birds are easily detected.

Based on the screening study, reconnaissance study and results of the pre-application avifaunal monitoring programme conducted for the Umbila Emoyeni Renewable Energy Farm and associated infrastructure (including cumulative impacts), it is the avifaunal specialist's informed opinion that the proposed development will not have a significant negative impact on the viability or persistence of avifaunal populations (particularly avifaunal SCCs) in the area following the implementation of mitigation measures. The proposed positions of the EGI provided in the layout are acceptable. It is the specialist's opinion that the proposed development can be approved from an avifaunal perspective and that the layout is acceptable.

10.2.4 Impacts on Bats

Pre-construction bat monitoring was undertaken over a period of 12 months for the project site in accordance with the best practice guidelines. The monitoring was designed to monitor bat activity across the area for the Umbila Emoyeni EGI.

Bat roosting sites in the project site are relatively limited and unlikely to support large congregations of bats, with no underground sites (e.g., caves, mines, sinkholes) present. The closest known major bat roost is approximately 75km north of the project site. Although occasional ridges and rocky outcrops are features of the landscape, none are present in the project site. Bats are likely to roost in buildings associated with farmsteads within and bordering the project site, especially Cape Serotine and Egyptian Free-tailed Bat. The building inspections on site did not reveal any roosting bats but evidence (e.g., fur-oil-stained exit/entry points) suggests that bats are using these features. Trees growing at these farmsteads and elsewhere on site where they form clumps could also provide roosting spaces for bats.

Sensitive features within the project site at which bat foraging activity may be concentrated include farm buildings (and within built up areas for some species) where they would forage for insects attracted to lighting, dams and wetland areas, within and along the edge of woodland/tree patches, and over cultivated areas (refer to **Table 10.1**).

Table 10.1: Features used to assign spatial risk categories in the project site for bats

Risk Level		
Low	Medium	No-Go
Heavily modified land	CBA Optimal	Farm Dams
Moderately modified land	ESA Landscape corridor	Wetlands
	ESA Local corridor	Trees
	Other Natural Areas	Buildings
		Rivers/Streams
		Wetlands
		CBA Irreplaceable Areas

Grid connection infrastructure impacts bats directly because bats collide with the power lines, and indirectly through the modification of habitats, including disturbance or destruction of roosting, foraging and commuting spaces. The potential impacts to bats as a result of construction and operation activities include the following:

- » Modification of bat foraging/commuting habitat.
- » Destruction of/Disturbance to bat roosts.
- » Bat mortality.
- » Disturbance to bats.

Based on the bat activity recorded at the site proposed for the Umbila Emoyeni EGI, the significance ratings for the majority of the impacts to bats posed by the development are predicted to be low and medium significance before mitigation. After mitigation, all impacts are predicted to be low. Based on the opportunity for reduction of the impacts through appropriate mitigation measures and appropriate micro-siting of infrastructure to avoid areas of sensitivity from a medium significance to a low, acceptable significance, no fatal flaws are expected to occur. Provided these mitigation measures are adhered to, it is the specialist's opinion that the project assessed can be approved.

10.2.5 Impacts on Soils and Agricultural Potential

Four main sensitive soil forms were identified within the project site, namely the Vaalbos, Avalon, Ermelo and Tukulu soil forms. The land capability sensitivity (DAFF, 2017) indicates a range of sensitivities expected throughout the project site, which predominantly covers "Low" to "Moderate" sensitivities. Smaller patches are characterised by sensitivities up to "Moderately High". Furthermore, various crop field boundaries were identified by means of the DFFE Screening Tool (2022), which are predominantly characterised by "High" sensitivities with one area being classified as "Very High" sensitivity.

The specialist has recommended that such high potential crop fields be avoided by throughout the life of the operation. If avoidance is not feasible, stakeholder engagement must be undertaken to compensate landowners for high crop field land use areas where necessary. In a case where relocating the project infrastructure is not feasible, the developer should engage with the owners of the crop fields for an appropriate compensation.

The Soils and Agricultural Potential Impact Assessment identified that all impacts associated with the development of the Umbila Emoyeni EGI will be of low significance before mitigation, and can be mitigated to an impact level of low significance. It is the specialist's opinion that the proposed development will have an overall low residual impact on the agricultural production ability of the land.

10.2.6 Impacts on Heritage Resources (archaeology, palaeontology and cultural landscape)

The proposed development will not have a substantial negative impact on the archaeological heritage resources identified within the proposed development area for the grid connection infrastructure. No Stone Age or Iron age archaeology was identified during the field assessment. Some historical ruins and kraals of contextual historic significance, graded III C, were identified; however, none of these are likely to be impacted as per the layout provided and assessed.

A number of burial grounds and/or graves were identified during the field assessment (Grade III A) and some of these fall within areas likely to be impacted as per the proposed layout. A 50m no-go buffer has been recommended around these burial grounds. The burial ground recorded as Observation 008 is located away from any proposed infrastructure and is therefore unlikely to be impacted by the development. However, it is still recommended that a no-development area of 50m be implemented around this site to ensure that no impact takes place.

No palaeontological no-go areas have been identified within the project areas. With the exception of one fossil site of low scientific value, none of the recorded fossil sites overlaps directly with, or lies close to (< 20 m) the proposed infrastructure and no modification of the layouts through micro-siting is proposed here on palaeontological grounds.

Impacts on archaeological and palaeontological heritage are expected to be of medium and high significance pre-mitigation and can be reduced to low significance post-mitigation.

Based on the outcomes of the Heritage Impact Assessment, it is not anticipated that the proposed development of the grid connection infrastructure will negatively impact on significant heritage resources on condition the recommended mitigation measures are adhered to.

10.2.7 Visual Impacts

The following sensitivities have been identified from a visual perspective:

- » Highly sensitive areas include:
 - * Areas immediately surrounding settlement and homesteads development of which is likely to significantly change the character of views for residents. A 1000m buffer is proposed which should be sufficient to ensure that development does not totally dominate views. It is possible that receptors (owners /residents) have no concern regarding the development of these areas, in which case the sensitivity rating will reduce.
 - * Areas on and immediately beside ridgelines as the development of these areas is likely to be more visible to surrounding areas including protected areas. A 1000m buffer is proposed; and Corridors beside the main roads that could be affected including the N17, the R35, and the R39. This is deemed sensitive because development in this corridor is likely to be highly obvious to people travelling along the roads the proposed 500m corridor should be sufficient to ensure that development does not totally dominate views.
- » Medium sensitivity areas include:

- * Watercourses and a buffer of 250m either side of watercourses. These areas are proposed in order to protect these natural features within the proposed focus area.
- » Low sensitivity areas include:
 - * Valley side slopes the development of which is likely to make the project least obvious from surrounding areas. The fact that development may be focused on areas with relatively low sensitivity does not preclude the necessity for mitigation.

The elements associated with the proposed grid connection are to a degree subject to the locations of the proposed renewable energy projects. A key consideration is the location of the proposed MTS relative to the renewable energy projects and the connection point on the existing 400kV overhead power line. The closer that it is located to the connection point the shorter the necessary additional 400kV loop in / loop out overhead power line is likely to be. Whilst this could mean that necessary overhead power line connections between the renewable energy projects and the MTS may be longer, these are likely to be lower power lines with significantly lower impacts.

At this early stage therefore a key consideration from minimising landscape and visual impacts is to locate the MTS as close to the existing 400kV overhead power line as possible as this is likely to minimise the extent of largest elements associated with the proposed grid connection that are likely to result in the largest impacts. It will also ensure that the impacts associated with these elements are most likely to impact areas that are currently affected by views of the existing 400kV overhead power line which is likely to help safeguard other areas of the landscape that are currently unaffected.

If the necessary overhead power lines and MTS were to be located in a manner that prevented them being visible to stakeholders, the entire focus area would be indicated as being highly sensitive. This wouldn't provide guidance of any value. It also needs to be borne in mind that the overhead power lines and the MTS are likely to be visible to differing extents and distances.

The proposed project will generally result in landscape and visual impacts of low to medium significance, depending on the distance from the grid connection infrastructure. Subject to mitigation measures being undertaken, from a Landscape and Visual Impact perspective, it is the specialist's opinion that there is no reason why the proposed project should not be authorised.

10.2.8 Socio-Economic Impacts

Impacts are expected to occur with the development of the Umbila Emoyeni EGI during the construction and decommissioning phases. Both positive and negative impacts are identified and assessed.

Impacts during construction include:

- » Impact on production.
- » Impact on the Gross Domestic Product (GDP).
- » Impact on employment creation.
- » Skills development.
- » Household income and standard living.
- » Temporary increase in government revenue.
- » Change in sense of place.
- » Safety and security.
- » Agricultural operations.
- » Influx of people.

- » Daily movement patterns.

Impacts during the operation phase include:

- » Impact on production.
- » Impact on the GDP.
- » Employment creation.
- » Household income and standard of living.
- » Increase in government revenue.
- » Rental revenue for landowners.
- » Improvement in energy sector generation.
- » Visual and sense of place impacts.
- » Impacts on agricultural operations.

Positive impacts during construction are expected to be of medium significance pre-enhancement and can be increased to medium (different score) post-enhancement. Negative impacts during construction are expected to be of medium and low significance pre-mitigation and can be reduced to medium (different score) and low significance post-mitigation, depending on the type of impact.

The net positive impacts associated with the development of the proposed project are expected to outweigh the net negative effects. The project is also envisaged to have a positive stimulus on the local economy and employment creation, leading to the economy's diversification and a small reduction in the unemployment rate. The project should therefore be considered for development. It should, however, be acknowledged that the negative impacts would be largely borne by the nearby farms and households residing on them, whilst the positive impacts will be distributed throughout both the local and national economies. Due to this imbalance, it is recommended that the mitigation measures suggested being strictly adhered to. Application of these mitigation measures will ensure that the negative impacts on the nearby farms and businesses are minimised and that the distribution of the potential benefits of the project are more balanced.

10.2.9 Traffic Impacts

It is assumed that if components are imported to South Africa, it will be via the Port of Richards Bay in KwaZulu-Natal, or the ports of East London and Ngqura in the Eastern Cape. The Port of Richards Bay is located ~460km travel distance from the proposed site whilst the ports of East London and Ngqura are respectively located ~1 130km and 1 200km travel distance from the proposed site. The Port of Richards Bay is the preferred port of entry; however, the ports of East London and Ngqura can be used as alternatives, should the Port of Richards Bay not be available.

The proposed site is bounded by the N17 in the south, the R39 in the south and east and the R35 in the west. Access to the proposed site can be obtained from any of these three roads, depending on the traffic volumes of each road. The road carrying the least traffic will be considered as the best option. There is also an existing network of unnumbered gravel roads that might be suitable as a main access road to the proposed site.

The construction and decommissioning phases of an EGI are the only significant traffic generators and therefore noise, dust and exhaust pollution will be higher during these phases. The duration of these phases is short term i.e., the impact of the EGI on traffic on the surrounding road network is temporary. The access point to the proposed site has been assessed and was found to be acceptable from a transport perspective.

The development is supported from a transport perspective provided that the recommendations and mitigation measures are adhered to.

10.2.10 Assessment of Cumulative Impacts

Cumulative impacts and benefits on various environmental and social receptors will occur to varying degrees with the development of several renewable energy facilities in South Africa. The degree of significance of these cumulative impacts is difficult to predict without detailed studies based on more comprehensive data/information on each of the receptors and the site-specific developments. The alignment of renewable energy developments with South Africa's National Energy Response Plan and the global drive to move away from the use of non-renewable energy resources and to reduce greenhouse gas emissions is undoubtedly positive. The economic benefits of renewable energy developments at a local, regional and national level have the potential to be significant.

There are several authorised renewable energy projects within a 30km radius of the proposed site, namely:

- » Majuba Solar PV Facility.
- » Tutuka Solar PV Facility.
- » Forzando North Coal Mine Solar PV Facility.
- » Hendrina Renewable Energy Complex.

In addition to the renewable energy facilities listed above, a number of existing power lines and substations are located within the area, including several low voltage power lines supported by wooden poles and high voltage infrastructure such as the Camden / Sol 2 400kV and the Camden / Tutuka 1 400kV power lines which cross the study area.

The majority of cumulative impacts associated with the Umbila Emoyeni EGI will be of a low significance, medium and high significance, with impacts of a high significance associated with the impacts on bats (which is largely associated with the wind energy facility which the EGI will support) and the socio-economic environment. A summary of the cumulative impacts is included in **Table 10.1** below.

Table 10.1: Summary of the cumulative impact significance for the Umbila Emoyeni EGI

Specialist assessment	Overall significance of impact of the proposed project considered in isolation	Cumulative significance of impact of the project and other projects in the area
Terrestrial Ecology	Low	Low and Medium
Freshwater Ecology	Low	Low
Avifauna	High	Medium
Bats	Medium	High
Soils and Agricultural Potential	Low	Low
Heritage (including archaeology, palaeontology and sense of place)	Medium	Medium
Visual	Low	Low and High
Socio-Economic	<i>Positive impacts:</i> Medium <i>Negative impacts:</i> Medium	<i>Positive impacts:</i> Medium <i>Negative impacts:</i> Medium

Specialist assessment	Overall significance of impact of the proposed project considered in isolation	Cumulative significance of impact of the project and other projects in the area
Traffic	Low	Medium (assuming all projects in the area are constructed at the same time)

Based on the specialist cumulative assessment and findings, the development of the Umbila Emoyeni EGI and its contribution to the overall impact of all renewable energy projects to be developed within a 30km radius, it can be concluded that the Umbila Emoyeni EGI cumulative impacts will be of low, medium and high significance, with impacts of a high significance mainly relating to visual impacts and the positive impacts on the socio-economic environment. Based on all other areas of study considered as part of this EIA report, the development of the Umbila Emoyeni EGI will not result in unacceptable, high cumulative impacts and will not result in a whole-scale change of the environment.

10.2.11 Assessment of No-go Alternative

The no-go option is the continuation of the existing land use, i.e. maintain the status quo. As detailed in the sections above, there would be no environmental impacts on the site or to the surrounding local area due to the construction activities of grid connection infrastructure with the implementation of this alternative. All negative impacts, specifically related to the development of the EGI, discussed in this report will not materialise.

The 'do-nothing' alternative will do little to influence the renewable energy targets set by government. However, as the project would provide essential supporting infrastructure to the proposed Umbila Emoyeni Wind Energy Facility and Umbila Emoyeni Solar Energy Facility (a total of 816MW), not developing the Umbila Emoyeni EGI would see the opportunity to develop these renewable energy projects being lost as there would be no means for them to connect to the electricity grid. Therefore, the 'do-nothing' alternative is not preferred.

From the specialist studies undertaken, no environmental fatal flaws were identified to be associated with the Umbila Emoyeni EGI subject to implementation of the recommended mitigation measures. All impacts associated with the project can be mitigated to acceptable levels. If the grid connection infrastructure is not developed, the following positive impacts will not be realised:

- » Job creation from the construction and operation phases.
- » Economic benefit to participating landowners due to the revenue that will be gained from leasing the land to the developer.
- » Meeting of energy generation mix in a most economic and rapid manner.
- » Provision of clean, renewable energy in an area where it is optimally available.

As detailed above, the 'do-nothing' alternative will result in a number of lost opportunities. The 'do nothing' alternative is therefore not preferred and not proposed to be implemented for the development of the Umbila Emoyeni EGI.

10.3. Assessment of the Grid Layout

The indicative EGI layout/development footprint assessed within this EIA Report (**Figure 10.1**) was designed by the project developer in order to respond to and avoid the sensitive environmental and social features

located within the project site, which were identified by the specialists during the Scoping Phase of the EIA process. This approach ensured the application of the mitigation hierarchy (i.e., avoid, minimise, mitigate, and offset) to the proposed project, which ultimately ensures that the development is appropriate from an environmental perspective and is suitable for development within the project site.

Based on the findings as documented in this EIA report, it was concluded that this layout avoids areas of sensitivity and therefore no further optimisation was recommended. As such, the impact of this proposed Facility Layout is considered to be acceptable and the layout is recommended for approval. Final micro-siting must however be undertaken prior to construction considering all mitigation measures recommended within this EIA Report and associated specialist studies.

10.4. Environmental Costs versus Benefits of the Umbila Emoyeni Renewable Energy Facility

Environmental costs (including those to the natural environment, economic and social environment) can be anticipated at a local and site-specific level and are considered acceptable provided the mitigation measures as outlined in the EIA Report and the EMP are implemented and adhered to. No fatal flaws have been identified. These environmental costs could include:

- » *Loss of biodiversity, flora and fauna due to the clearing of land for the construction and utilisation of land for the wind farm* - The cost of loss of biodiversity has been minimised/avoided through avoiding placement of project components and infrastructure within the ecological features considered to be of very high sensitivity (no-go areas).
- » *Impacts on freshwater resources* - the impacts on freshwater resources have been minimised through the avoidance of the sensitive features by project infrastructure. Access roads will however need to cross some freshwater resource features, some of which will be on existing gravel roads.
- » *Visual impacts associated with the wind farm/impacts to the sense of place* - The Umbila Emoyeni EGI will be visible to receptors up to a distance of 22km. No mitigation of this impact is possible (i.e., the structures will be visible in the landscape), but general mitigation and management are required as best practise to minimise secondary visual impacts which may arise from mismanagement of the site. Other large scale industrial operations including transmission lines and substations, mining operations and power stations are relatively obvious in the region. Whilst the proposed project will create a new large scale industrial operation and change the character of an area of rural landscape, this is not entirely out of character with the region.
- » *Loss of land for agriculture* – The development will remove areas available for agricultural activities; however, based on the small development footprint of the EGI and the fact that agricultural activities can continue on the properties together with the development, this will be limited and not significant.
- » *Impacts on birds and bats* – loss of birds and bats species due to collision with infrastructure and habitat destruction. The impact has been minimised through the avoidance of areas of very high sensitivity (no-go areas) and is considered to be acceptable with implementation of mitigation measures.
- » *Negative impact to the cultural landscape* - The Umbila Emoyeni EGI is proposed within a landscape area with an overriding rural character within which there are large industrial nodes including mining operations and coal fired power stations. Whilst the proposed project will create a new large scale industrial node within the agricultural landscape, this is not entirely out of character with the broader region. However, it will be a significant local character change.
- » *Loss of heritage and palaeontological resources* – Six burial grounds were identified within and close to the project site, around which a 50m no-go buffer has been recommended. With the exception of one fossil site of low scientific value, none of the recorded fossil sites overlaps directly with, or lies close to (< 20m) the proposed infrastructure.

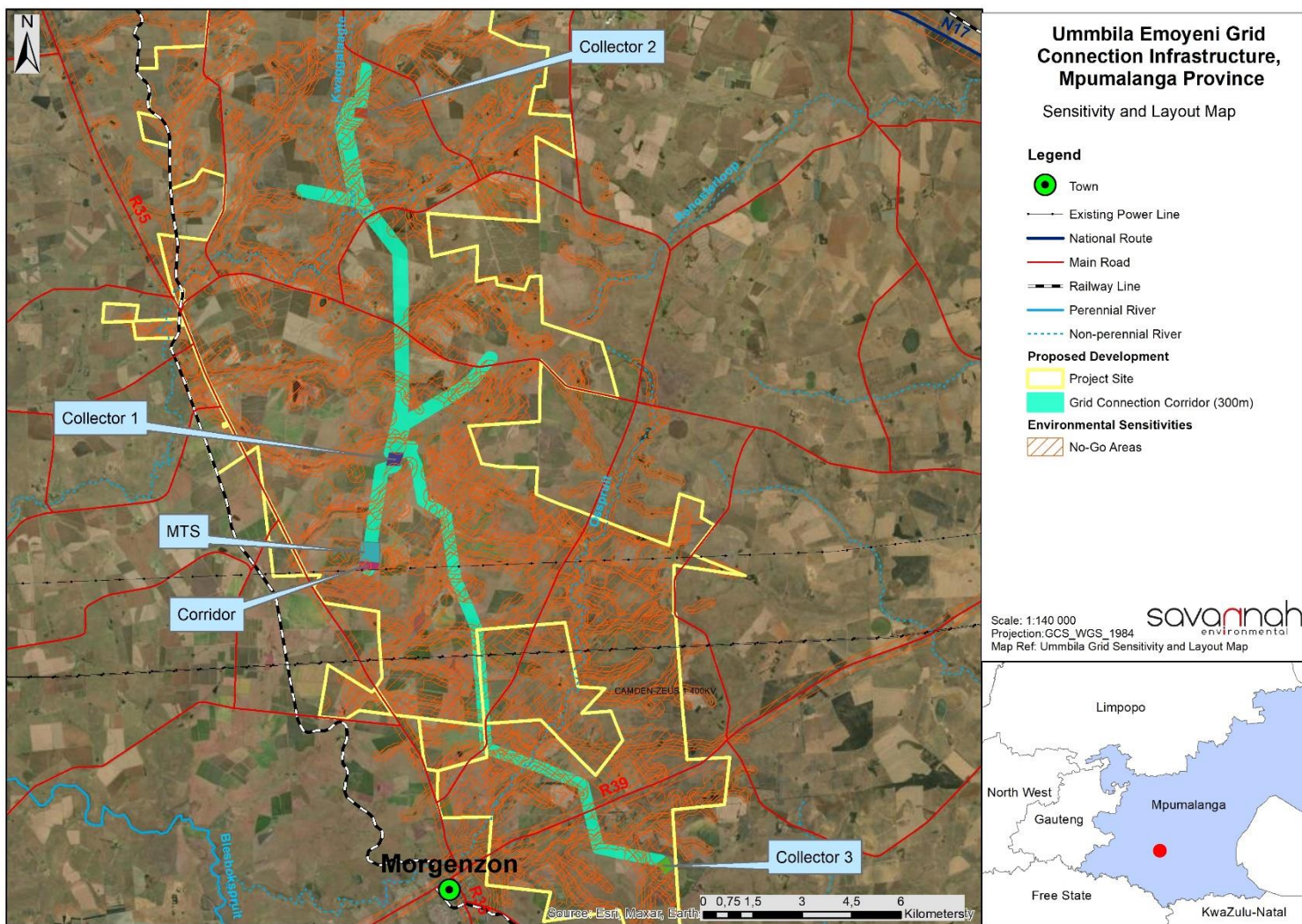


Figure 10.2: The development footprint of the Umbila Emoyeni EGI, as assessed within this EIA Report, overlain on the identified sensitive environmental features (also refer to **Appendix O**)

Benefits of the Umbila Emoyeni EGI include the following:

- » The project will facilitate the connection of the wind and solar energy facilities proposed as part of the Umbila Renewable Energy Farm to the national grid. This is a total of 816MW additional electricity available to the national grid. This will have benefits at a national level.
- » The project will result in important economic benefits at the local and regional scale through job creation, income and other associated downstream economic development. These will persist during the pre-construction, construction, and decommissioning phases of the project.
- » The project contributes towards the Provincial and Local goals for the development of renewable energy as outlined in the respective IDPs, as it provides essential infrastructure for solar and wind energy facilities.
- » The project supports wind and solar developments which serve to diversify the economy and electricity generation mix of South Africa, in line with national policy regarding energy generation.
- » South Africa's per capita greenhouse gas emissions are amongst the highest in the world due to the reliance on fossil fuels. The Umbila Emoyeni EGI will support 816MW of renewable energy which will contribute to achieving goals for implementation of renewable energy and sustaining a 'green' economy within South Africa.

The benefits of the Umbila Emoyeni EGI are expected to occur at a national, regional and local level. As the costs to the environment at a site-specific level have been largely limited through the appropriate placement of infrastructure on the project site within lower sensitive areas, the benefits of the project are expected to partially offset the localised environmental costs of the grid connection infrastructure, provided that the mitigation measures, as recommended by the specialists are adhered to.

10.5. Overall Conclusion (Impact Statement)

The preferred activity was determined by the developer to be the development of grid connection infrastructure, including 132kV and 400kV infrastructure, to transmit and distribute electricity generated from the proposed renewable energy facilities included within the Umbila Renewable Energy Farm. A technically viable development footprint was proposed by the developer considering environmental sensitivities identified in the scoping study and assessed as part of the EIA process. The assessment of the development footprint within the project site was undertaken by independent specialists and their findings have informed the results of this EIA Report.

From a review of the relevant policy and planning framework, it was concluded that the project is well aligned with the policy framework as a result of it providing essential supporting infrastructure for renewable energy development, and a clear need for the project is seen from a policy perspective at a local, provincial and National level.

The specialist findings from the EIA studies undertaken have indicated that there are no identified fatal flaws associated with the implementation of the development footprint within the project site subject to implementation of the recommended mitigation measures. The developer has designed a project development footprint in response to the identified sensitive environmental features and areas present within the project site. This approach is in line with the application of the mitigation hierarchy, where all the sensitive areas which could be impacted by the development have been avoided (i.e., tier 1 of the mitigation hierarchy).

Impacts can be mitigated to acceptable levels or enhanced through the implementation of the recommended mitigation or enhancement measures. This is however not relevant for the visual impact of the grid connection infrastructure as the EGI components will be visible regardless of the mitigation applied. This high significance rating is, however, not considered as a fatal flaw by the specialist.

As detailed in the cost-benefit analysis, the benefits of the Umbila Emoyeni EGI are expected to occur at a national, regional and local level. As the costs to the environment at a site-specific level have been largely limited through the appropriate placement of infrastructure on the project site within lower sensitive areas through the avoidance of features and areas considered to be sensitive/no-go for development, the benefits of the project are expected to partially offset the localised environmental costs of the grid connection infrastructure. From a social perspective, both positive and negative impacts are expected.

Through the assessment of the development footprint within the project site, it can be concluded that the development of the Umbila Emoyeni EGI will not result in unacceptable environmental impacts (subject to the implementation of the recommended mitigation measures).

10.6. Overall Recommendation

Considering the findings of the independent specialist studies, the impacts identified, the development footprint proposed by the developer, the avoidance of the sensitive environmental features within the project site, as well as the potential to further minimise the impacts to acceptable levels through mitigation, it is the reasoned opinion of the EAP that the Umbila Emoyeni EGI is acceptable within the landscape and can reasonably be authorised subject to implementation of the refined optimised facility layout and the mitigation and enhancement measures recommended by the specialists.

The grid connection infrastructure will include:

- » A new 400/132 kV Main Transmission Substation (MTS), to be located adjacent to the Camden SOL Overhead Lines (OHLs).
- » New collector stations: each will comprise several incoming 132 kV lines from each project switching station, feeder bays, 132kV bus bars and outgoing line to the MTS.
- » Two 400kV loop-in loop-out OHLs to the existing Camden-Sol 400kV transmission line.
- » On-site switching stations (132kV in capacity) at each renewable energy facility.
- » 132kV power lines from the switching stations to the collector substations and ultimately to a new MTS.
- » On-site IPP substations where the generated power will be transformed from 33 kV to 132 kV so that it can be evacuated to Collector station and MTS
- » Access roads up to 8m wide.

The 400/132kV MTS will serve as the main point of connection to which the internal 132kV power lines of the proposed Umbila Emoyeni Wind and Solar Energy facilities will connect. The connection of the proposed 400/132kV MTS to the national grid will be via a new loop-in loop-out 400kV power line that will connect into the existing Camden-Sol 400kV transmission line.

The following key conditions would be required to be included within an authorisation issued for the Umbila Emoyeni EGI:

- » All mitigation measures detailed within this EIA Report, as well as the specialist reports contained within **Appendices D to L** are to be implemented.
- » The EMPs (for the power lines and onsite substations) as contained within **Appendix N** of this EIA Report should form part of the contract with the Contractors appointed to construct and maintain the grid connection infrastructure in order to ensure compliance with environmental specifications and management measures. The implementation of this EMP for all life cycle phases of the Umbila Emoyeni EGI is considered key in achieving the appropriate environmental management standards as detailed for this project.
- » Following the final design of the Umbila Emoyeni EGI, a final layout must be submitted to DFFE for review and approval prior to commencing with construction. Micro-siting must take all recommended mitigation measures into consideration. No development is permitted within the identified no-go areas as detailed in **Figure 10.2**.
- » An Environmental Site Officer (ESO) must form part of the on-site team to ensure that the EMP is implemented and enforced and an Environmental Control Officer (ECO) must be appointed to oversee the implementation activities and monitor compliance for the duration of the construction phase.
- » Preconstruction walk-through of the final development footprint for protected species that would be affected and that can be translocated must be undertaken. The survey must also cover sensitive habitats and species that are required to be avoided. Permits from the relevant provincial authorities, will be required to relocate and/or disturb listed plant species.
- » Prevent birds from nesting in substation infrastructure through exclusion covers or spikes if required (determined on a case-by-case basis).
- » All other relevant environmental permits must be obtained prior to the construction of the facility.

A validity period of 10 years of the Environmental Authorisation is requested, should the project obtain approval from DFFE.

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