

ENVIRONMENTAL IMPACT ASSESSMENT BACKGROUND INFORMATION DOCUMENT



NOTIFICATION OF ENVIRONMENTAL IMPACT ASSESSMENT PROCESS FOR THE PROPOSED PRECAST CONCRETE MANUFACTURING FACILITY ON THE REMAINDER OF PORTION 3 OF THE FARM 854, KOUGA LOCAL MUNICIPALITY, EASTERN CAPE PROVINCE

INTRODUCTION

Habitat Link Consulting (Pty) Ltd has been appointed by Maswana Group of Companies on behalf of Nordex Energy South Africa (Pty) Ltd. (the Proponent) to submit an application for the abovementioned development in terms of the National Environmental Management Act (NEMA) (Act No. 107 of 1998, as amended). The proponent intends to conduct a Basic Assessment process for the proposed precast concrete manufacturing facility located near Papiesfontein. The footprint of the facility is approximately 9.5 ha, located situated 14 km northwest of Jeffreys Bay, within the Kouga Local Municipality, Eastern Cape Province (Figure 1 and 2). The property is currently zoned for Agriculture and a rezoning to 'Industrial' has been applied for.

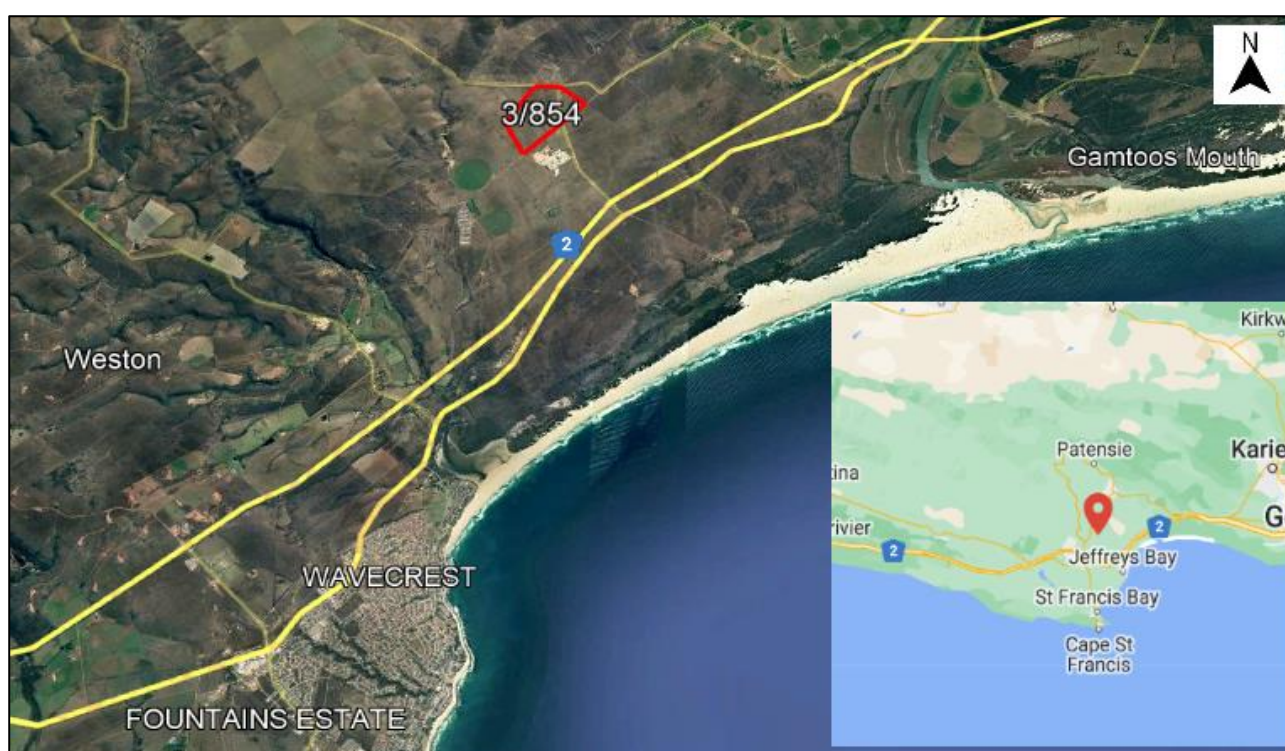


Figure 1: Locality map of the proposed residential development.



Figure 2: Proposed development site.

The proposed activity entails the construction of a precast concrete manufacturing facility for the manufacturing of 80 concrete wind towers that consist of 1 425 keystones or precast elements of approximately 20 m x 6 m each (Figure 3). The precast keystones will be used to support wind turbine towers which will be supplied to the nearby wind farms. Concrete will be produced from an on-site batching plant.

The lifespan of the facility is expected to be between two and five years. The basic process that will take place on site will include material reception, steel assembly, concrete pouring, finishing stage, storage and quality control. The resources to be kept on site will include 1 000 m³ sand, 1 000 m³ gravel, 350 tonnes of steel (6 towers); 400 tons of cement and 600 keystones.

Access from the R102 towards the nearest boundary of the property is gained along a 2.3 km gravel road section. The Gravel road is in fair condition and is being used by construction vehicles to and from the Vlakteplaas Quarry.



Figure 3: Proposed precast concrete section of wind turbine mast.

AIM OF THIS DOCUMENT

The purpose of this Background Information Document (BID) is to ensure that people who are interested in, or affected by, the project are provided with the relevant information, including the process being followed. Registering as an Interested and/or Affected Party (I&AP) allows individuals or groups to contribute ideas, issues and concerns relating to the project. I&APs also have an opportunity to review all of the reports and submit their comments on these reports. All of the comments that are received will be included in the final reports that are submitted to the Competent Authority (CA). All I&APs are hereby invited to register their interest and submit initial comments on any aspect of the project.

PROJECT DESCRIPTION

The precast concrete towers are used instead of steel towers to support the wind turbines on wind farms. The concrete segments are typically manufactured in custom-built precast concrete factories situated as close as possible to the wind farm locations.

The infrastructure on site will consist of the following:

- **Cover Tent:** Covered area where main production activities will be performed. This area will include reinforcement templates, moulds and gantry cranes occupying an area of 160 x 66 m² with a height of 6.5 m.
- **Storage Yard:** Area destined to store finished keystones. The loading of keystones onto transport trucks with gantry cranes will be the last operation. Final dimensions of the area depend on the amount of storage required, a maximum area 28.000 m² will be considered.
- **Batching Plant:** Area where keystones will be produced. It includes tanks for liquid components, a mixer, conveyor belts, and silos. The main batching plant will include four silos and the backup batching plant two silos with a maximum height of 21 m per silo.

- Laboratory: The laboratory will be located next to the batching plant and will be used to perform trials and quality tests to self-compacted concrete. It will include a humidity room with controlled parameters to cure the concrete. The building size will be 200 m² and the testing area 400 m².
- Water Treatment System: The system will consist of several connected tanks for the decantation process of the particles as well as the oil from the cleaning of batching plant and mixer trucks with a size of 400 m².
- Aggregates Shed: The shed will be used to store aggregates for concrete. It will be located next to the batching plant with a size of 1.000 m².
- Water Tanks (Reservoirs): The factory will have an area for tanks to keep water for the factory and the batching plant with a size of 5 x 15 m³.
- Warehouse: A room (1 500 m²) that will be used to store tools and equipment.
- Auxiliary Installations: Additional facilities that will include offices, a rest room and toilets.



Figure 4: Typical site layout (aerial image of the factory).

The Eastern Cape Biodiversity Conservation Plan (ECBCP, 2019) classifies sections of the property as a terrestrial Critical Biodiversity Area (CBA). The development will take place over an area defined as a Threatened Ecosystem (Humansdorp Shale Renosterveld), which is classified as endangered. Furthermore, there are three (3) non-perennial drainage lines identified within the property that may be affected by the proposed development.

APPLICABLE LEGISLATION

National Environmental Management Act (NEMA) (Act No. 107 of 1998, as amended)

The proposed development constitutes listed activities in terms of the 2014 EIA Regulations (as amended) as promulgated under NEMA. As such, the proposed development requires an EA prior to commencement of construction and operation. The following listed activity published in GN R. 983 (as amended in GN R. 327) is potentially triggered:

Activity No.	Description	Triggering activity
LISTING NOTICE 1 – GN R. 983 (GN R 327)		
Activity 12	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) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse.	The proposed development may take place within 32 m of a watercourse as defined by the Department of Water and Sanitation (DWS) database.
Activity 19	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 watercourse.	The proposed development may require excavations or infilling within a watercourse as defined by the Department of Water and Sanitation (DWS) database.
Activity 27	The clearance of an area of 1 hectare or more, but less than 20 hectares of indigenous vegetation.	The total development footprint will exceed 1 ha and is situated within indigenous vegetation.
Activity 28	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 1 hectare;	The proposed development will be approximately 8.2 ha and will take place on land that has historically been utilised for agricultural purposes.
LISTING NOTICE 3 – GN R. 983 (GN R 324)		
Activity 12	The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. a. Eastern Cape i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004	The proposed development will require the clearance of approximately 8.2 ha of vegetation that may be considered indigenous occurring to the NEMA definition. The proposed development will be located within an endangered ecosystem (Humansdorp Shale Renosterveld) according to NEM:BA.

Based on the listed activity identified in **Listing Notice 1 and 3 of the NEMA EIA Regulations**, the proposed project will be **subject to a Basic Assessment process**. In order to comply with the NEMA, the impacts associated with the activities listed above will need to be identified and assessed during this process and will include the necessary specialist studies. The Competent Authority (CA) for this project is identified as the Member of the Executive Council (MEC) of the Eastern Cape Department of Economic Development, Environmental Affairs and Tourism (DEDEAT).

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

The NHRA provides for the protection and management of South Africa's heritage resources. Section 38 of the NHRA notes that *'any person who intends to undertake a development categorized as –*

(c) any development or other activity which will change the character of a site—

(i) exceeding 5 000 m² in extent; or

(d) the re-zoning of a site exceeding 10 000 m² in extent

must at the very early 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.'

The proposed development will change the character of the site. As such, the provincial heritage authority must be notified of the development and the relevant heritage assessments undertaken as part of the Basic Assessment process. Any additional requirements will be determined by the relevant heritage authorities during the NEMA process.

National Water Act (NWA) (Act No. 36 of 1998, as amended)

The NWA is the primary regulatory legislation for the control, management and use of water resources. Section 21 of the NWA sets out water uses that may require registration or licencing. According to Section 21 of the NWA, water use activities include:

(a) taking water from a water resource

(b) storing water

(c) impeding or diverting the flow of water in a water course

(i) altering the bed, banks, course or characteristics of a watercourse.

This includes any development activities that involve abstraction or storage of water from a river or borehole as well as activities that may impact upon the flow, function and water quality of watercourses. According to Regulation 509 of 2016 (General Authorisation in terms of Section 39 of the NWA for Water Uses as Defined in Section 21(c) or Section 21(i), the *"regulated area of a watercourse"* for water uses includes *"a 500 m radius from the delineated boundary (extent) of any wetland or pan"* and *"within 100 m from the edge of a watercourse."*

Water supply obtained for the development may be required from a groundwater resource and therefore water abstraction and/or storage licencing may be required. The proposed development may be located within 100 m of a drainage line as defined by the spatial datasets and may require a water use authorisation from the Department of Water and Sanitation (DWS).

BASIC ASSESSMENT PROCESS

The listed activities trigger the requirement of a Basic Assessment process (Figure 5). A draft Basic Assessment Report (BAR) will be compiled and will comprehensively describe the activities and impacts that the project may have on the receiving environment, including specialist reports and details from the public participation (PPP) process. In addition, an Environmental Management Programme (EMPr) will be compiled for the proposed development in order to make provision for relevant environmental management and mitigation measures.

The draft BAR and EMPr will be published for a 30-day public commenting period. Subsequent to the review and commenting period, a final BAR will be compiled for submission to the competent authority. This will include all public comments and responses to issues raised by stakeholders. Following the issuing of the EA, all registered I&APs will be notified accordingly and given the opportunity to appeal against the decision, should they so wish to do so.

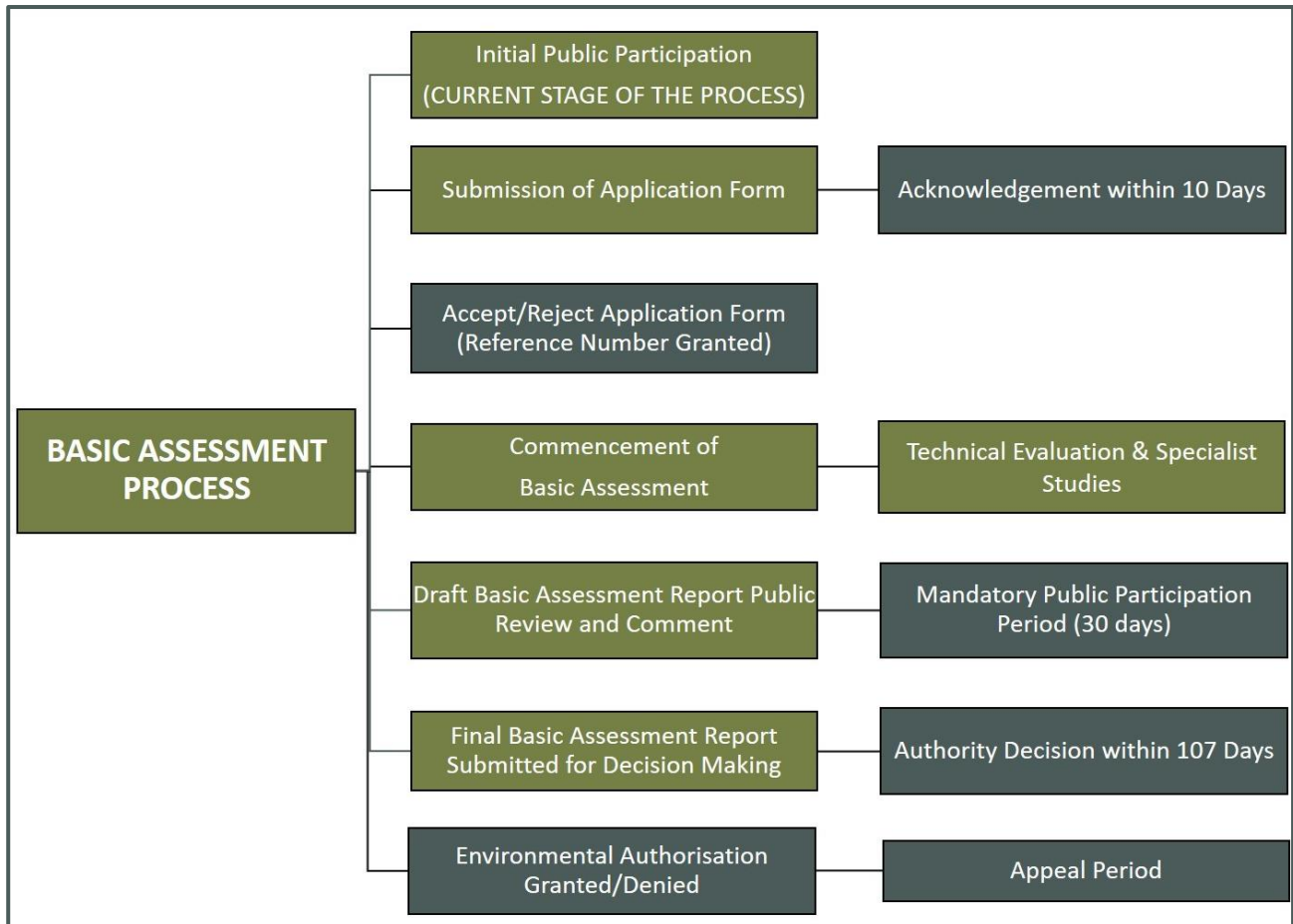


Figure 5: Basic Assessment process.

POTENTIAL IMPACTS ASSOCIATED WITH THE DEVELOPMENT

The following preliminary environmental issues have been identified and will be investigated during the application process:

- Potential loss of vegetation communities;
- Potential impacts on biodiversity and Species of Conservation Concern;
- Disruption of ecosystem function and processes (e.g., invasion of alien plant species);
- Storm water and erosion;
- Impact on aquatic systems;
- Dust, noise and other nuisance aspects;
- Generation of waste and effluent;
- Impact on visual aesthetics;
- Socio-economic impacts; and
- Compatibility with surrounding area.

These and other impacts will be assessed in detail during the Basic Assessment process and mitigation measures to reduce the significance of the negative impacts will be provided in the EMPr.

PUBLIC PARTICIPATION PROCESS

In terms of NEMA, public participation forms an integral part of the EIA process. The Public Participation Process (PPP) provides people who may be (or have been) affected by the development with an opportunity to provide comment and to raise issues of concern about the project, or to make suggestions that may result in enhanced benefits for the project.

Comments and issues raised during the PPP will be captured, evaluated and included in an Issues and Responses Trail (IRT). These issues will be addressed and included in the final versions of the reports, which will be submitted to the competent authority.

DELIVERABLES

The environmental assessment will culminate in the compilation of a Basic Assessment Report (BAR) and Environmental Management Programme (EMPr). The BAR will be submitted to DEDEAT, the regulatory authority responsible for the review of the report. Following review of the report, DEDEAT has to reach a decision as to whether, and under which conditions, the project may proceed, based on environmental considerations. An environmental authorisation will be granted or refused based on the information provided in the Basic Assessment Report. I&APs who have registered will be notified of the environmental authorisation decision.

PUBLIC PARTICIPATION PROCESS AND INVITATION TO COMMENT

In terms of the NEMA, public participation forms an integral part of the Basic Assessment process. The Public Participation Process (PPP) provides people who may be affected by the proposed development with an opportunity to provide comment and to raise issues of concern about the project, or to make suggestions that may result in enhanced benefits for the project. Comments and issues raised during the PPP will be captured, evaluated and included in an Issues and Responses Trail (IRT). These issues will be addressed and included in the final versions of the reports, which will be submitted to the DEDEAT.

Please submit your name, contact information (address, telephone number and email address) and any written comments to Habitat Link Consulting:



Postal Address: 117 Cape Road, Mount Croix, Port Elizabeth, 6001

Tel or WhatsApp: 074 148 5583

Email: comments@habitatlink.co.za or christelle@habitatlink.co.za

Should you wish to express your views regarding this proposed development, please send us your written comments. The names of all registered Interested and Affected Parties (I&APs), together with the comments received, will be incorporated into the IRT and will be submitted to the competent authority (DEDEAT).