



Volume III: Public Participation Report

Proposed Emvelo Wind Energy Facility
and Associated Grid Infrastructure,
near Ermelo, Mpumalanga

PREPARED FOR

14/12/16/3/3/2/2611

FINAL FOR DFFE DECISION

DATE

7 October 2024

REFERENCE

0684401



DOCUMENT DETAILS

DOCUMENT TITLE	Volume III: Public Participation Report
DOCUMENT SUBTITLE	Proposed Emvelo Wind Energy Facility and Associated Grid Infrastructure, near Ermelo, Mpumalanga
PROJECT NUMBER	0684401
Date	7 October 2024
Version	01
Author	Sadiya Salie
Client name	Emvelo Wind Energy Facility (Pty) Ltd

DOCUMENT HISTORY

VERSION	REVISION	AUTHOR	REVIEWED BY	ERM APPROVAL TO		COMMENTS
				ISSUE	NAME	
1.0	00	ERM	Stephanie Gopaul	Stephanie Gopaul	04-10-2024	Draft for Client consideration
2.0	01	ERM	Stephanie Gopaul	Stephanie Gopaul	07-10-2024	Final for DFFE Decision

Volume III: Public Participation Report

Proposed Emvelo Wind Energy Facility and Associated Grid Infrastructure, near Ermelo, Mpumalanga

0684401



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1. INTRODUCTION

Emvelo Wind Energy Facility (Pty) Ltd ('the Project Applicant') is applying for EA to construct and operate the up to 240 MW Emvelo Wind Energy Facility (WEF) ('the proposed Emvelo WEF') and its auxiliary infrastructure, which includes one on-site substation, with capacity of up to 132 kV, to facilitate the connection between the WEF and the electricity grid. As well as an up to 132 kV over-head powerline of approximately 31.5 km (300 m corridor), traversing twenty-one (21) land parcels, be constructed to connect the proposed WEF to the Eskom Uitkoms Substation.

The proposed development is located approximately 30 km east of Ermelo within the Msukaligwa Local Municipality, and Gert Sibande District Municipality.

In terms of Chapter 5 of the National Environmental Management Act, 1998 (Act 107 of 1998 – NEMA), and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), the Project Applicant appointed Environmental Resources Management Southern Africa (Pty) Ltd (ERM), to act as the Environmental Assessment Practitioner (EAP) and to undertake the Scoping and Environmental Impact Assessment (S&EIA) process for Environmental Authorisation.

2. THE PUBLIC PARTICIPATION PROCESS

Engaging with external stakeholders on the project and associated Public Participation Process (PPP) is a key part of the overall S&EIA process. The PPP is key in that it provides the public the opportunity to have meaningful input into the decision-making process. The primary aims of the PPP are:

- To inform Interested and Affected Parties (I&APs) of the proposed development;
- To identify and respond to issues, comments and concerns as raised by I&APs;
- To promote transparency of the project and its potential consequences and ensure I&APs understanding of the proposed development;
- To facilitate open dialogue and liaise with all I&APs;
- To assist in identifying potential environmental (biophysical and socio-economic) impacts associated with the proposed development; and
- To ensure that all I&AP issues and comments are accurately recorded, addressed and documented in a Comments & Response Report.

This Public Participation Report has been compiled as Volume III to the respective Volume I – Final Scoping Report. This report has been updated to include all comments received throughout the application process up until submission of the Final Scoping Report (FSR) to Department of Forestry, Fisheries and the Environment (DFFE) for decision.

The sharing of I&AP information complies with the Protection of Personal Information Act, 2013 (POPI Act 4 of 2013). The following steps have been and will continue to be undertaken throughout the PPP to ensure compliance:

- The contact details, e-mail address and postal address of the public will not be made available for public review, however this will be made available to the Department and to any I&AP who may wish to appeal; and
- The contact details, e-mail address and postal address of I&APs will be blacked out in the Comments and Responses Report and Public Participation Documents.

3. METHODOLOGY

The PPP follows the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the National Environmental Management Act, 1998 (Act 107 of 1998) (NEMA) Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), as well as the Public Participation Guidelines in terms of NEMA, 1998 EIA Regulations, 2014.

3.1 IDENTIFICATION OF POTENTIAL INTERESTED AND AFFECTED PARTIES

The I&AP database (Appendix A) was created by ERM, in consultation with the Applicant and was used as the baseline for the pre-identified I&APs list.

Pre-identified / Registered I&APs included:

- Pre-identified I&APs who are identifiable affected landowners and surrounding landowners. Landowners and surrounding landowners will also be requested to inform the occupiers of their properties regarding the project.
- Government organisations, NGOs, relevant municipalities, ward councilors and other key stakeholders and organ of states that might be affected.
- Registered I&APs who responded to the advertisements (i.e., newspapers, notices, and e-mails) and requested to be registered or request to register any other person/s.

This database will be updated throughout the duration of the scoping process and will continue to be updated through to the EIA phase. Anyone with an interest in the proposed development and/or associated EIA process are encouraged to register.

3.2 INITIAL NOTIFICATION PHASE

Initial Notification was conducted prior to the completion of the Draft Scoping Report (DSR). Notification during this phase was undertaken in the following manner:

- Site notices were erected on the site boundary in July 2023;
- Notices were erected in the towns of Ermelo, Amsterdam and Sheepmoor in July 2023;
- Advertisements were placed in the Highveld Newspaper and the Mpumalanga News Newspaper in July 2023; and
- Initial notification e-mails were distributed on to all pre-identified I&APs, including the affected landowner and occupiers of the site, municipal councillor(s), ratepayers in the area, affected district and local municipalities, and organs of state. I&APs who responded to the newspaper and notices were also sent an initial notification email.

The public notices and initial notification contained sufficient information on the proposed application and afforded pre-identified and interested I&APs the opportunity to submit their issues / queries / concerns and indicate the contact details of any other potential I&APs that should be contacted and registered. The contact person at ERM, contact number and email details were clearly stated on the notifications.

3.3 SCOPING PHASE

3.3.1 AVAILABILITY OF THE DRAFT SCOPING REPORT (DSR) FOR PUBLIC REVIEW

Notification regarding the availability of the DSR for public review and comment (Appendix D) were sent to all registered I&APs (pre-identified key I&APs, I&APs registered during the initial period, as well as affected landowners, surrounding landowners and their occupiers) via e-mail. SMS notifications were sent to I&APs and / or land occupiers that have supplied mobile phone numbers and who did not have an email. The written notification also advised registered I&APs of the following:

- How and where they could access the DSR (electronic and hardcopy);
- The duration that the DSR was made available for public comment, and the date by when comments must be submitted; and
- To submit their comment / questions / queries / concerns regarding the development and content of the DSR.

The table below presents the respective locations the DSR was made available for public review and comment from **22 August 2024 until the 21 September 2024 (both days inclusive)**. **The commenting period was 30 days, as per the NEMA, 1998 EIA Regulations, 2014 (as amended)**.

Location	Physical Address
Hard Copy Location	
Ermelo Public Library	Msukaligwa Municipality Civic Centre, corner of Church and Smuts street, Ermelo, 2350, Mpumalanga
CD copies were available upon request.	
Electronic Copy Locations	
ERM Website	https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/
Electronic Transfer	Interested and Affected Parties (I&APs) could request for copies to be shared via a One Drive folder.

3.3.2 SUBMISSION OF THE FINAL SCOPING REPORT (FSR)

Notification regarding the submission of the FSR to DFFE for a decision will be sent all registered I&APs in the following manner:

- Written Notification (English and / or Afrikaans) will be sent to all registered I&APs via e-mail. SMS notifications will be sent to I&APs and / or land occupiers that have supplied mobile phone numbers and who do not have an email address.
- If written notification cannot be sent to an I&AP, notification will be provided telephonically.

4. ENVIRONMENTAL IMPACT ASSESSMENT (EIA) PHASE PP PROCESS

During the EIA phase, the following tasks will be undertaken for public participation:

- Written Notification regarding the application process (English and / or Afrikaans) will be sent to all registered I&APs via e-mail. SMS notifications will be sent to I&APs and / or land occupiers that have supplied mobile phone numbers and who do not have a postal or email addresses.
- If written notification cannot be sent to an I&AP, notification will be provided telephonically.
- Notification to inform registered I&APs of the availability of the Draft EIA Report for public review and comment (which is a mandatory 30 days);
- A public event will be held in order to explain the findings of the EIA, if requested;
- The Comments and Responses Report will be updated, to record comments and / or queries received and the responses provided. This report will be included in a Final EIA Report for submission to the DFFE;
- Authority review and decision; and
- Notification of all registered I&APs, key stakeholders, and organs of state of the decision by the DFFE and the appeal procedure.

Focus Group Meetings or One-on-One meetings will be held if necessary, throughout the EIA process. Furthermore, I&APs will also be able to register throughout the duration of the EIA process. Once registered, I&APs will be informed about the EIA process as it progresses.

5. DECISION AND APPEAL PHASE

All registered I&APs will be provided with access to the decision on the EIA Report and the reasons for such decision. Registered I&APs will also be notified of the appeal process and that appeals can be lodged against the decision in terms of the NEMA, 1998, National Appeal Regulations, 2014 (as amended).

Notifications regarding the DFFE decision will be provided in the following manner to all registered I&APs:

- Via e-mail, which will include an attachment of the decision, reasons for the decision, and appeal procedure;
- Via SMS, which will be sent to I&APs and land occupiers that have supplied mobile phone numbers and who do not have a postal or email addresses. The SMS will advise the I&AP that access to the decision, reasons for the decision, and appeal procedure must be accessed from the ERM website: <https://www.erm.com>; and

- Courtesy telephone calls will be made to those who cannot be contacted by either of the above-mentioned methods to advise them of the decision made by the DFFE and to confirm if and / or how they wish to receive access to the decision, reasons for decision, and appeal procedure.

I&APs will be provided with access to the decision, reasons for the decision by the DFFE and the process for appeals within 14 days of date of receipt of the decision.

6. SUMMARY OF COMMENTS

During the initial notification phase, no comments / queries / questions / concerns were received from I&APs.

During the DSR PPP comment were received from the DFFE, DARDLEA, MTPA, other authorities and I&APs. Follow-up e-mails were sent to all registered I&APs, stakeholder and authorities, and no further comments were received.

Responses to comments received during the PP period is provided in Section 7, Table 7.1 below, with EAP / specialist / applicant responses, and the original comment and responses has been appended to the PP report which will be submitted with the FSR for DFFE decision.

7. COMMENTS AND RESPONSES REPORT

This comments and responses table has been updated throughout the duration of the scoping process and comments has been collated by thread and not by date.

TABLE 7.1 COMMENTS AND RESPONSE TABLE FOR IAPS ON DRAFT SCOPING PHASE 22 AUGUST 2024 (RESUBMISSION)

Ref	Name and Organisation	Date and Method	Phase of PPP	Comment	Response
1.	Nrateng Mashiloane Aviation Environmental Compliance Department	22 August 2024 Per email	Draft Scoping Phase	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>Subject: RE: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga</p> <p>Good day,</p> <p>I hope this email finds you well. Kindly note that the SACAA has transferred all obstacle assessments and applications responsibilities to Air Traffic and Navigation Services (ATNS) as published on the SACAA website: www.caa.co.za/industryinformation/obstacles/ . A formal application must be lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. The list and contact details of the approved obstacles assessment services providers can be obtained from the CAA website: www.caa.co.za.</p> <p>Kind regards,</p>	The EAP acknowledges that the SACAA has transferred all application responsibilities to Air Traffic and Navigation Services (ATNS). The applicant confirms that a formal application has been lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted.

<p>2.</p>	<p>Sindy Mbuyane DARDLEA</p>	<p>23 August 2024 Per email</p>	<p>Draft Scoping Phase</p>	<p>From: [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]</p> <p>Subject: Re: Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga</p> <p>Good day Stephanie,</p> <p>Thank you for the resubmission notification. Are the reports submitted to our Office the updated versions or we need to await submission of the updates before considering receipt of such reports? I recall an email by Lloyd that there will be updates on the reports.</p> <p>Kind Regards, SIndi</p>	<p>Good day Sindy,</p> <p>Thank you for your query.</p> <p>The report content of the versions you have has not changed with the resubmission, other than the amendment of the dates of public participation (PP), and thus the versions you have can be used to confirm receipt if you are happy to do so. Additional copies of the reports (including the amended dates for PP) have been couriered to you and should be with you soon.</p> <p>Please let me know if you have any queries regarding the above.</p> <p>Kind regards,</p>
<p>3.</p>	<p>Pamela Madondo Environment Compliance Specialist</p>	<p>26 August 2024 Per email</p>	<p>Draft Scoping Phase</p>	<p>From: [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]</p> <p>Subject: RE: Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga</p> <p>Good day,</p> <p>I hope this email finds you well. Kindly note that the SACAA has transferred all obstacle</p>	<p>The EAP acknowledges that the SACAA has transferred all application responsibilities to Air Traffic and Navigation Services (ATNS). The applicant confirms that a formal application has been lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted.</p>

				<p>assessments and applications responsibilities to Air Traffic and Navigation Services (ATNS) as published on the SACAA website: www.caa.co.za/industryinformation/obstacles/ . A formal application must be lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. The list and contact details of the approved obstacles assessment services providers can be obtained from the CAA website: www.caa.co.za.</p> <p>Kind regards,</p> <p>Pamela Madondo</p>	
4.	<p>Tebego Kgaphola</p> <p>Branch: Biodiversity and Conservation</p>	<p>26 August 2024</p> <p>Per email</p>	<p>Draft Scoping Phase</p>	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>Subject: RE: Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga</p> <p>Good morning</p> <p>Kindly note that our comments still stands.</p>	<p>The EAP acknowledges that Biodiversity and Conservations comment still stands.</p>
5.	<p>Salome Mambane</p> <p>Department of Forestry, Fisheries and the Environment (DFFE)</p> <p>Integrated Environmental Authorisations</p>	<p>26 August 2024</p> <p>Per email</p>	<p>Draft Scoping Phase</p>	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>Subject: 14/12/16/3/3/2/2611</p>	<p>EAP acknowledges receipt of the comment from the Department on the Draft Scoping Report for the Emvelo WEF.</p>

Dear Sir/Madam

ACKNOWLEDGEMENT OF RECEIPT OF THE NEW APPLICATION FORM AND DRAFT SCOPING REPORT FOR THE PROPOSED PROPOSED DEVELOPMENT OF THE EMVELO WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, AND GERT SIBANDE DISTRICT MUNICIPALITY, MPUMALANGA PROVINCE.

The Department confirms having received the Application Form and Draft Scoping Report for Environmental Authorisation for the abovementioned project on 22 August 2024. You have submitted these documents to comply with the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.

Kindly note that your application for Environmental Authorisation falls within the ambit of an application applied for in terms of Part 3 of Chapter 4 of the EIA Regulations, 2014, as amended. You are therefore referred to Regulation 21 of the EIA Regulations, 2014 as amended.

Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states that potential Interested & Affected Parties, including the Competent Authority, may be provided with an opportunity to comment on reports and plans contemplated in Regulation 40(1) of the EIA Regulations, 2014, as amended, prior to the submission of an application but must be provided an opportunity to comment on such reports once an application has been submitted to the Competent Authority.

				<p>Note that in terms of Regulation 45 of the EIA Regulations, 2014, as amended, this application will lapse if the applicant fails to meet any of the time-frames prescribed in terms of these Regulations, unless an extension has been granted by the Department in terms of Regulation 3(7) of the EIA Regulations, 2014, as amended.</p> <p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.</p>	
6.	Mpilo Masondo NTCSA	2 September 2024 Per email	Draft Scoping Phase	<p>From: [REDACTED]</p> <p>Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga</p> <p>Good day,</p> <p>Please could you send the kmz files of the proposed projects to see whether any of our current or future projects will be affected.</p> <p>Regards, Mpilo</p>	<p>Good day,</p> <p>Please see attached KMZ files as requested.</p> <p>Kind Regards</p>
7.	Josua Meyer Interest and Affected Party	10 September 2024 Per email	Draft Scoping Phase	<p>From: [REDACTED]</p> <p>Subject: Re: VOORGESTELDE ERMELO WINDPLASE</p>	<p>Good day Josua,</p> <p>I have attached a copy of the form for your perusal, please do complete and send back to me so that I am able to capture your data. Attached are the shapefiles of the land parcels of affected Land Owners. I confirm that you are a registered I&AP. The development is within its comment</p>

				<p>Dankie vir uit maar EIENDOM GRENSE word nie getoon nie. Uitleg dus nutteloos aangesien grense noodsaaklik is om enige kommentaar te lewer voor periode daarvoor verstryk (20/9/24) VERSOEK DUS DRINGEND UITLEG WAT EIENDOM GRENSE EN PAAIE DUIDELIK TOON Vertrou op u spoedige reaksie By voorbaat dank</p>	<p>period and any comments made by you in this period will be captured accordingly.</p> <p>You will also receive further communication regarding the development as it moves through its different phases.</p> <p>Kind Regards</p>
8.	<p>Josua Meyer</p> <p>Interest and Affected Party</p>			<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>Subject: Re: SHEEPMOOR, EMVELO WIND ENERGIE PROJEKTE</p> <p>Het ongelukkig nie toegang tot Aida nie Kan u vorm asb aanstuur Wys u egter daarop dat as aangrensende eienaar aan u beoogde ontwikkeling registrasie outomaties deur u ontwikkelaar gedoen moet word. Graag verneem ek of sodanige registrasie wel gedoen is aangesien nog geen korrespondensie in die verband ontvang is nie Vertrou op spoedige en gunstige reaksie op bogemelde</p>	<p>Good day Josua,</p> <p>I have attached a copy of the form for your perusal, please do complete and send back to me so that I am able to capture your data. Attached are the shapefiles of the land parcels of affected Land Owners. I confirm that you are a registered I&AP. The development is within its comment period and any comments made by you in this period will be captured accordingly.</p> <p>You will also receive further communication regarding the development as it moves through its different phases.</p> <p>Kind Regards</p>
9.	<p>Robyn Luyt</p> <p>DARDLEA</p>	<p>11 September 2024</p> <p>Per email</p>	<p>Draft Scoping Phase</p>	<p>From: [REDACTED]</p> <p>[REDACTED]</p>	<p>The EAP acknowledges receipt of the attendance register for the engagement meeting. The register is attached to the PPP report as annexure A.</p>

				<p>[Redacted]</p> <p>Subject: Attendance Register Mulilo Renewable Energies engagement</p> <p>Good afternoon everyone,</p> <p>Herewith the attendance register of physical attendees at today's meeting for your records.</p> <p>Kind Regards Robyn</p>	
10.	<p>Ryan David-Andersen</p> <p>Interested and Affected Party</p>	<p>13 September 2024</p> <p>Per email</p>	<p>Draft Scoping Phase</p>	<p>From: [Redacted]</p> <p>[Redacted]</p> <p>Subject: Registration as I&AP for Mpumalanga Projects</p> <p>Dear ERM</p> <p>Please may you register my details in signature below for any Mpumalanga projects - including Amsterdam - we are developing a wind farm near Ermelo named Zephyr.</p> <p>Thanks very much</p> <p>Ryan David-Andersen</p>	<p>Good day Ryan,</p> <p>Thank you for reaching out, your details will be captured.</p> <p>Kind regards,</p>
11.	<p>Robyn Luyt</p> <p>DARDLEA</p>	<p>17 September 2024</p>	<p>Draft Scoping Phase</p>	<p>From: [Redacted]</p> <p>[Redacted]</p>	<p>The EAP acknowledges receipt of DARDLEAs comment on Emvelo WEF.</p>

		Per email		<p>[Redacted]</p> <p>Subject: SR Comments Emvelo WEF Amsterdam Cluster Importance: High</p> <p>Dear Stephanie,</p> <p>Please find herewith DARDLEAs comments on the draft Scoping Report for the Emvelo WEF and Grid Connection.</p> <p>Comments for Sheepmoor and Rochdale to follow.</p> <p>Kind Regards Robyn</p>	
12.	Celia De Waal MTPA	18 September 2024	Draft Scoping Phase	<p>From: [Redacted]</p> <p>[Redacted]</p>	<p>Hi Celia,</p> <p>Thank you for providing comment on the Sheepmoor WEF facility. Are you able to please indicate when we can expect comment on the remaining 2 facilities, namely Rochdale and Emvelo.</p> <p>Kind regards Lucien</p>

				<p>Subject: MTPA's comments LUA 24/3967 - Draft EIA Scoping Report for the proposed development of the Sheepmoor Wind Energy facility.</p> <p>Dear Ms. Gopaul</p> <p>Kindly receive the attached comments from the MTPA regarding a Draft EIA Report for the proposed development of the Sheepmoor Wind Energy facility (WEF) with 23 wind turbines and Auxiliary infrastructure.</p> <p>Your reference number: Project 0684401 (DFFE: 14/12/16/3/3/2/2593)</p> <p>Our EIA registration/reference number is LUA 24/3967 (kindly use this number in any further correspondence to us regarding this project)</p> <p>Kind regards</p> <p>Celia de Waal</p>	
13.	Celia De Waal MTPA	19 September 2024	Draft Scoping Phase	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>Subject: RE: MTPA's comments LUA 24/3967 - Draft EIA Scoping Report for the proposed development of the Sheepmoor Wind Energy facility.</p> <p>Good morning</p> <p>Regarding your enquiry below, the following:</p>	<p>Hi Celia,</p> <p>Thank you for the update,</p> <p>Regards</p>

				<ul style="list-style-type: none"> The comments for the Emvelo project (our ref: LUA 24/3966) is currently at the Acting Manager: Scientific Service for review). The signed copy might be released today, which will be send to you as soon as I receive it. The commenting scientist is currently still busy commenting on the Rochdale project (LUA 24/3965). <p>Kind regards</p> <p>Celia</p>	
14.	Josua Meyer Interested and Affected Party	19 September 2024	Draft Scoping Phase	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>Subject:</p> <p>[ATTACHMENT SKM_C250i24091906550]</p> <p>APPENDIX A COMMENTS ON ROCKDALE, EMVELO AND SHEEPMOOR WIND FARMS</p> <p>The following problems are foreseen with development of above-mentioned wind farms</p> <p>1. DISTURBANCE OF CLIMATE AND Rainfalls</p> <p>The escarpment has a unique rainfall pattern where the east wind introduces moisture into layers and condenses as rain and/or precipitates as fog and dew once it moves in over the plateau. The fog and dew that comes in along with the east wind is critically important and prevents pollination problems especially during mid-summer droughts.</p>	<p>Hi Josua,</p> <p>Thank you for sharing your concerns about the proposed WEF cluster. We appreciate your input. Your comments will be considered during the Environmental Impact Assessment (EIA) phase.</p> <p>As part of the process, we will assess potential changes to the wind turbine layout and work to avoid sensitive areas to minimize any negative impacts. Your feedback appreciated and we will keep you updated as the EIA progresses.</p> <p>Kind regards,</p>

Turbulence of rotary turbine rotors increases vertical mixing of heat and water vapor which adversely affects meteorological conditions downwind, including rainfall.

Wind turbines further cause significant desiccation of soil by pulling the warmer upper air down to the ground in order to increase soil temperatures.

Turbines therefore change local wind patterns that have negative impacts on rainfall, soil moisture and even micro climate with long-term effects on fertility and productivity of agricultural soils and grasslands.

THE PLACEMENT OF THE WIND TURBINES AT THE BOTTOM OF THE ESCARPMENT WILL THEREFORE BE FATAL TO THE ENVIRONMENT'S CLIMATE AND VEGETATION WHICH WILL ALSO ADVERSELY AFFECT MV FARMING PROSPECTS IN THE LONG TERM.

2. Bird LIFE IS THREATENED

Area consists of unique grassland that provides ideal habitat for several rare and endangered bird species. It also hosts large diverse small grassland species that are not even mentioned here.

Number of several threatened and/or protected species found here include :

Breekop arende (eagles). Breeding pair successfully hatched chick this year.

- Sekretaris Voels. Several old as well as active nests enter the area. As recently as May '24, a pair with a chick were spotted at Waaihoek.

Mahem is found widely spread throughout area which is also actively breeding. A chick is often spotted with adults.

Blou Kraanvoels are on the rise with at least one chick observed annually.

- Fish eagles also regularly visit the ponds in the area.

		<p>- Veldpou occurs but is currently becoming rare. Nests in the field were also spotted already. Kalkoen Ibus is common with several active breeding colonies. There are positive signs that Aasvoels are also moving back. Breeding colonies are active at Smithfield, not far from the area.</p> <p>Various owl species that may not be extinct but are extremely necessary to ensure ecological balance are also present in large numbers AI the bird species, as well as bats and insects, are essential to maintain balance in the ecology and are in danger of either being killed or relocated to other areas due to this. Fatal collision with turbine blade Habitat disturbances by increased soil temperatures. Air pressure changes voar turbines as well as the vertebrae behind turbines. Very sensitive to low frequency electromagnetic pressure causing waves by wind turbines that act adversely on hui Eradicating nests and even killing them to eliminate approval barriers as has already been proven with the shooting of a break-headed eagle.</p> <p>3. ANIMAL LIFE IS THREATENED The following rare and protected nursing animals are found here Oorbietjie Bruinhiena Mieshoop Tier Aardwolf</p> <p>The animals are in danger of moving away by habitat destruction, vibration and noise caused by turbines. Dirty electricity produced by wind power can pass through cables and into the ground. The soil stream has a detrimental effect</p>
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on the productivity and reproduction of mammals.

4. NOISE AND VIRTUAL POLLUTION

Wind turbines produce sound waves (pressure waves) by the rotating blades and are heard as rumbling and/or detectable as infra-sounds as well as electromagnetic waves generated upon conversion of wind energy into electricity. The conversion produces poor quality power (dirty electricity and ground current) which is detrimental to human and animal health. The shade flickering of turbines is also contributing factor to health problems.

There is a definite link between the 'ground current' produced by turbines and cancer. It has been documented that childhood leukemia has increased by 300% due to it.

However, the above can activate several other clinical health conditions in humans.

In animals and insects that perceive low frequency sounds and vibrations better than humans, there is great danger of moving out of territory and thus disappearing altogether.

IN LIGHT OF THE FACTS, A TURBINE AND CABLE Free BUFFER ZONE OF AT LEAST 1.5 KM FROM My PROPERTY'S BOUNDARY WIRES MUST BE REHABILITATED.

The number of how turbines contributes to virtual pollution of nature.

5. INFRASTRUCTURE

The improved infrastructure will lead to increases in movement and inflow of undesirable elements which will drastically increase crime. Stock theft at my farm has stopped since I stopped scraping district road to Sheepmoor because it has become difficult to pass.

During the construction phase, labour unrest can be expected due to expectations created in local populations.

				<p>The fact that no turbines are allowed on my property will not indemnify my property from the negative side effects of the 3 wind farms. THOROUGH FURTHER INVESTIGATIONS ARE THEREFORE REQUESTED BEFORE APPROVAL IS GRANTED TO PROJECT BY THE AUTHORITY</p> <ul style="list-style-type: none"> - LONG-TERM INFLUENCE OF PLANNED WIND FARMS ON AGRICULTURE, CLIMATE AND RAIN FALL. - IDENTIFICATION AND MOVEMENTS OF ENDANGERED AND PROTECTED Bird SPECIES AS WELL AS WHERE NESTS OCCUR, ACTIVE AND OLD NESTS. - IDENTIFICATION OF THE RARE MAMMALS AS WELL AS THEIR MOVEMENTS IN THE AREA. <p>Foresees adverse long-term prospects for agriculture and environment and therefore cannot UNRESERVEDLY support development of wind farms. Sincerely, On behalf of JOSHUA MEYER TRUST</p>	
15.	Kirsten Jones Interested and Affected Party	19 September 2024	Draft Scoping Phase	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>Subject: Sheepmoor, Rochdale and Emvelo WEFs - Registration as I&AP</p> <p>Hi there,</p> <p>Please could you register myself and colleague Francois le Roex (copied) as I&APs on these projects,</p> <p>Kind regards</p>	<p>Good day,</p> <p>Thank you for your email, you will now be added as an I&AP to the proposed Sheepmoor, Rochdale and Emvelo WEFs.</p> <p>Kind Regards</p>

<p>16.</p>	<p>Kirsten Jones Interested and Affected Party</p>	<p>20 September 2024</p>	<p>Draft Scoping Phase</p>	<p>From: [Redacted] [Redacted] [Redacted] [Redacted] [Redacted] [Redacted] [Redacted] [Redacted]</p> <p>Subject: RE: Sheepmoor, Rochdale and Emvelo WEFs - Registration as I&AP</p> <p>Thanks Lucien,</p> <p>Will you be uploading the FSR onto the website (and notifying I&APs) once it has been submitted to DFFE?</p> <p>Kind regards Kirsten</p>	<p>Hi Kristen, That is correct. Kind Regards</p>
<p>17.</p>	<p>Josua Meyer Interested and Affected Party</p>	<p>20 September 2024 Aida Form</p>	<p>Draft Scoping Phase</p>	<p>From: [Redacted] [Redacted] [Redacted] [Redacted] [Redacted]</p> <p>Subject:</p> <p>What's your name? Josua Last Name Meyer Who do you represent? Organisation - Josua Meyer Trust Designation - Trustee Your Email - [Redacted] Your Phone Number - [Redacted] Alternative Phone Number - n/a Your Address Street Address - Plaas Ondwerwacht Street Address Line 2 - Plaas Waaihoek City - Ermelo</p>	<p>The EAP acknowledges receipt of IAPs Aida response form as well as attached file.</p>

				<p>State/Province - Mpumalanga Zip Code - n/a Country - RSA What is your interest in the projects? - Plaas Eenaar Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website? Please copy and paste the link onto a browser (https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/) No What are your comments regarding the Rochdale, Emvelo and Sheepmoor WEF Cluster? Verwys na bylaag A aangeheg Protection of Personal Information (POPI) Act, Act 4 of 2013 Do you consent to your information being published in the public domain, and being used as part of the Public Participation Process? Yes</p>	
18.	Moya Odendaal Interested and Affected Party	21 September 2024 Aida Form	Draft Scoping Phase	<p>Dear AidaForm user, Your form "Stakeholder Engagement Form" has a new response. =====</p> <p>1. What's your name? Moya Odendaal</p> <p>2. Who do you represent? Heya Lidri Pty Ltd Odendaal</p> <p>3. Your Email [REDACTED]</p> <p>4. Your Phone Number</p>	<p>Good day, Thank you for your comment. Your comments will be taken into consideration during the EIA phase of the proposed WEF Cluster. Kind Regards</p>



				<p>[REDACTED]</p> <p>5. Alternative Phone Number [REDACTED]</p> <p>6. Your Address [REDACTED]</p> <p>7. What is your interest in the projects? Environment</p> <p>8. Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website? Yes</p> <p>9. What are your comments regarding the Rochdale, Emvelo and Sheepmoor WEF Cluster? It will change the environment forever</p> <p>10. Protection of Personal Information (POPI) Act, Act 4 of 2013 No (0)</p>	
19.	Rone Odendaal Interested and Affected Party	21 September 2024 Aida Form	Draft Scoping Phase	<p>Dear AidaForm user,</p> <p>Your form "Stakeholder Engagement Form" has a new response.</p> <p>=====</p> <p>1. What's your name? Rone Odendaal</p> <p>2. Who do you represent? Individual Affected party</p> <p>3. Your Email [REDACTED]</p> <p>4. Your Phone Number</p>	<p>Good day,</p> <p>Thank you for your comment. Your comments will be taken into consideration during the EIA phase of the proposed WEF Cluster.</p> <p>Kind Regards</p>

				<p>[REDACTED]</p> <p>5. Alternative Phone Number [REDACTED]</p> <p>6. Your Address Athole farm, Amsterdam, Mpumalanga, 2375, South Africa</p> <p>7. What is your interest in the projects? Strongly oppose</p> <p>8. Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website? No</p> <p>9. What are your comments regarding the Rochdale, Emvelo and Sheepmoor WEF Cluster? Negative impact on the environment and bird life.</p> <p>10. Protection of Personal Information (POPI) Act, Act 4 of 2013 No (0)</p>	
20.	Bathandwa Ncube DFFE	24 September 2024 Per email	Draft Scoping Phase	<p>From: [REDACTED]</p> <p>[REDACTED]</p>	The EAP acknowledges receipt of DFFE's comment on Mulilo WEF Cluster.

				<p>Subject: 14/12/16/3/3/2/2611; 14/12/16/3/3/2/2612; 14/12/16/3/3/2/2613</p> <p>Goodday</p> <p>Please find attached, DSR comments for the proposed Emvelo, Rochdale and Sheepmoor WEF developments.</p> <p>Kind regards Ms Bathandwa Ncube (EAPASA)</p>	
21.	Celia De Waal MTPA	01 October 2024 Per Email	Draft Scoping Report	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>Subject: FW: MTPA's comments LUA 24/3966 - Draft Scoping for 45 wind turbines (Emvelo Wind Energy)</p> <p>Good day</p> <p>Kindly receive two of the letters as requested</p> <p>I will follow up with Frans Krige on LUA 24/3965, Rochdale, as soon as he is done with his meeting.</p> <p>Regards</p>	
22.	Celia De Waal MTPA	01 October 2024 Per Email	Draft Scoping Report	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>Subject: DRaft Comments LUA 24-3965 Rochdale Wind Energy Facility</p> <p>Good day</p>	Thanks Celia!

				<p>Kindly receive the draft comments from Mr. Krige of LUA 24-3965. As soon as we have a signed copy, I will forward it to you.</p> <p>Kind regards</p>	
23.	<p>Celia De Waal</p> <p>MTPA</p>	<p>02 October 2024</p> <p>Per Email</p>	<p>Draft Scoping Report</p>	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>Subject: MTPA's comments: LUA 24/3965 - Draft Scoping report for the Rochdale Wind Energy Facility near Ermelo</p> <p>Good day</p> <p>Kindly receive the attached comments from the MTPA regarding a Draft Scoping Report for the 240 MW Rochdale Wind Energy Facility near Ermelo.</p> <p>Your reference number is: 0684401</p> <p>Our EIA registration/reference number is: LUA 24/3965</p> <p>Kind regards</p> <p>Celia de Waal</p>	<p>Hi Celia</p> <p>Signed copy well received</p> <p>Kind Regards</p>

TABLE 7.2 COMMENTS AND RESPONSES ON NEW APPLICATION FOR DRAFT SCOPING PHASE RECEIVED FROM DFFE (24 SEPTEMBER 2024)

Application Form			
No.	Comment from DFFE	EAP Response	Section in Report
1.	Please confirm that the postal code for the EAP's address is correct.	Application form has been updated. EAP's address has been updated.	Please refer to Application form.
2.	The screening tool report attached as Appendix 14 of the application form must be signed by the compiler.	Signature has been added to Appendix 14.	Please refer to Application form.
3.	Please ensure that all relevant listed activities are applied for, are specific and that it can be linked to the development activity or infrastructure as described in the project description. The onus is on the applicant and the environmental assessment practitioner (EAP) to ensure that all the applicable listed activities are included in the application form. Failure to do so may result in unnecessary delays in the processing of the application.	Listed activities in the application form corresponds to those listed in the Final Scoping Report.	Please refer to Application form and Table 3.1 in this Final Scoping Report.
4.	If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted with the final SR.	Listed activities in the application form mirror those listed in this Final Scoping Report.	Please refer to Application form.
5.	Please take note of GNR 4143, which was gazetted on the 04 December	The proposed development is not near to an Eskom Main Transmission Substation (MTS) and therefore does not trigger the need for consent	Not Applicable.

2023, which requires a letter of consent from Eskom Holdings SOC Ltd if the proposed development is within a specific radius of a main electricity transmission or distribution substation. Should this gazette apply to the proposed development, please ensure the necessary documents are included.

from Eskom in terms of GN 4143. However, the applicant confirms that it will engage Eskom further during the EIA phases and during the confirmation of the final layout to ensure all relevant set back requirements are met
Kind Regards,

Specialist Assessments			
No.	Comment from DFFE	EAP Response	Section in Report
6.	Page 4 of the meeting minutes of the pre-application meeting held on 26 April 2023 refers to the applicant undertaking a Geotechnical Assessment; however, this study is not included in the Specialist Plan of Study (PoS). All required specialist studies must be conducted as part of the EIA process. If there are development design constraints, a desktop Geotechnical Assessment must be included as part of the Specialist PoS.	The EAP is of the opinion that a Geotechnical Assessment for the development can and will only be undertaken prior to the commencement of the construction phase. A desktop geotechnical assessment has already been conducted as part of the EIA phase studies and will be included in the EIA documentation. Furthermore a detailed geotechnical assessment will be completed prior to the start of construction.	Not Applicable.
7.	The Civil Aviation Theme has a “Medium sensitivity” rating, as per the outcome of the screening tool provided. According to the protocols, a Civil Aviation Compliance Statement must be included in the PoS. Should a compliance statement not be included as part of the PoS, a motivation/explanation for	Please note that an obstacle assessment will be undertaken prior to construction. An application has been submitted to ATNS to evaluate the preliminary WEF layout and final approvals will be received prior to construction.	Not Applicable.

	its exclusion, must be provided [including proof of request for comments from the Air Traffic and Navigation Services (ATNS)].		
8.	You are requested to submit copies of signed Specialist Declaration of Interest forms (witnessed and signed by a Commissioner of Oaths) for all specialist studies conducted. The forms are available on Department's website (please use the Department template).	Specialist Declarations have been included in Volume II.	Please refer to Volume II – Specialist Studies.
9.	Please note that in terms of 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), it is a requirement for specialists to be registered with the South African Council for Natural Scientific Professions (SACNASP) in their respective fields.	SACNASP certifications has been included in Volume II.	Please refer to Volume II – Specialist Studies.
10.	The Heritage Survey, which has been included as part of this SR, must be submitted to the South African Heritage Resources Agency (SAHRA) for comments, via the South African Heritage Resources Information System (SAHRIS).	All requested documentation will be uploaded to the South African Heritage Resources Agency (SAHRA) for comments, via the South African Heritage Resources Information System (SAHRIS). Should comment be received following submission of the FSR, the comment will be sent to the Department for consideration.	Not Applicable.

Public participation process			
No.	Comment from DFFE	EAP Response	Section in Report
11.	The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.	The public participation process for the Emvelo WEF has been conducted in terms of Regulation 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.	Refer to Section 9 of the FSR and Volume III – Public Participation Report.
12.	The proposed development site is within a Critical Biodiversity Area (CBA) and National Protected Areas Expansion Strategy (NPAES). Comments must be obtained from this Department’s Biodiversity Conservation Section. The contact details are as follows: i. Biodiversity Conservation Directorate Attention: Mr. Seoka Lekota Email: BCAdmin@dffe.gov.za ii. Protected Areas Planning and Management Effectiveness Directorate Attention: Mr. Thivhulawi Nethononda Email: TNethononda@dffe.gov.za	All issues raised and comments received during the availability of the DSR have been addressed in the Public Participation Report (Volume III) and in the FSR, as required. Comments have been provided from BCAdmin and comments from Protected Areas Planning and Management Effectiveness will be obtained during the EIA phase.	Refer to the PP Report – Volume III.
13.	Please ensure that all issues raised and comments received during the circulation of the draft SR from registered Interested and Affected Parties (I&APs) and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed and included in the final SR.	All issues raised and comments received during the availability of the DSR has been addressed in the Public Participation Report (Volume III) and in the FSR, as required. The Project Details of the FSR - Volume I, reflects the changes made from DSR to FSR.	Refer to the PP Report – Volume III.

14.	Copies of original comments received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity are submitted to the Department with the final SR.	Original comments received from I&APs and organs of state have been included in Volume III – Public Participation Report.	Refer to the PP Report – Volume III.
15.	Proof of correspondence with the various stakeholders must be included in the final SR. This must indicate that this draft SR has been subjected to 30 days public participation process, stating the start and end date of the PPP. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments.	This has been provided for in the Public Participation Report (Volume III) of the FSR. Any correspondence with relevant organs of state and stakeholders has been included in the comments and response table. Where no correspondence has been received, the proof of attempts to retrieve a comment has been provided.	Refer to the PP Report – Volume III.
16.	All issues raised and comments received during the circulation of the draft SR from I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final SR, including comments from this Department, and must be incorporated into the Comments and Response Report (CRR).	All issues raised and comments received during the availability of the DSR has been addressed in the Public Participation Report (Volume III) and in the FSR, as required. The Project Details of the FSR - Volume I, reflects the changes made from DSR to FSR.	Refer to the PP Report – Volume III.
17.	The CRR report must be a separate document from the main report and the format must be in the table format as indicated in Annexure 1 of this comments letter.	The C&R report is included in the PP Report (Volume III) of the FSR and is therefore separate from the main report.	Refer to the PP Report – Volume III.
18.	Comments from I&APs must not be split and arranged into categories.	Comments from each individual has been responded to individually in the C&R report.	Refer to the PP Report – Volume III.

	Comments from each submission must be responded to individually.		
19.	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 an I&AP’s comments.	Comments received have been adequately addressed and have not been summarised in the C&R report.	Refer to the PP Report – Volume III.
20.	The attendance register and minutes of any meetings held by the Environmental Assessment Practitioner (EAP) with Interested and Affected Parties (I&APs) and other role players must be included in the final SR.	This has been included as an Appendix in Volume III.	Please refer Volume III – Public Participation Report.
21.	Provide photo evidence of on-site notices, including the names of landmarks and/or GPS coordinates (in degrees, minutes, and seconds) of their placements.	This has been included as an Appendix in Volume III.	Please refer Volume III – Public Participation Report.
22.	Please submit a full page of the newspaper(s) containing the advertisement, ensuring that the information in the advert is legible and that the name of the newspaper and date are visible.	This has been included as an Appendix in Volume III.	Please refer Volume III – Public Participation Report.
General			
No.	Comment from DFFE	EAP Response	Section in Report
	You are further reminded to comply with Regulation 21(1) of the NEMA		

EIA Regulations 2014, as amended, which states that:

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

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

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

TABLE 7.3 COMMENTS AND RESPONSE TABLE ON NEW APPLICATION FOR DRAFT SCOPING PHASE RECEIVED FROM DARDLEA (20 SEPTEMBER 2024)

Ref	Comment	Response
1	<p>The proposed Emvelo Wind Energy Facility and associated grid infrastructure is located in areas Identified as CBA Irreplaceable and Optimal (over 21%), Intact Grassland Patches (33%), Key Biodiversity Areas (21.4%), ESAs, Priority Focus Areas, Freshwater Ecosystem Priority Areas and Threatened Ecosystems (Endangered). Furthermore, 43% of the site falls within Grasslands SA02.0 Important Bird Area (IBA), and close to two other Important Bird Areas.</p>	<p>This has been noted. The layout will be revised during the EIA phase, to avoid Key Biodiversity Areas and No-go areas.</p>
2	<p>The proposed Emvelo WEF and associated grid connection is located in an area comprising a high diversity of threatened bird species, Including the following confirmed on site: African Marsh Harrier (Regionally Endangered); Denham's Bustard (Globally Near Threatened; Regionally Vulnerable); Secretary bird (Globally Endangered, Regionally Vulnerable); White bellied Bustard (Regionally Vulnerable), Blue Crane (Globally Vulnerable, Regionally Near Threatened); Grey Crowned Crane (Globally and Regionally Endangered); Martial Eagle (Globally and Regionally Endangered); Lanner Falcon (Regionally Vulnerable); Greater Flamingo (Regionally Near Threatened); Southern Bald Ibis (Regionally and Globally Vulnerable); Cape Vulture (Globally Vulnerable and Regionally Endangered); and Yellow breasted Pipit (Regionally and Globally Vulnerable).</p>	<p>All wetland No-Go areas as identified by the Aquatic Specialist should be buffered by an additional 110m on either side to reduce the risk of turbine collisions and to prevent the disturbance of priority species breeding and roosting in these areas. Priority species in this category include African Fish Eagle, African Grass Owl, African Marsh Harrier, Black-winged Pratincole, Blue Crane, Grey Crowned Crane, Long-crested Eagle, Marsh Owl, Yellow-billed Stork, and sensitive Species Number 23 (as listed by the National Screening Tool). During the EIA Phase fine scale habitat modelling and identification of wetland corridors for cryptic / low detection probability wetland species will be conducted. Two forms of risk zones will be delineated, namely core breeding habitat, and associated connectivity habitat. Connectivity habitat will include wetland habitats not used for breeding but for movement, as well as wetland/grassland margins. These features will need to be buffered to account for the sensitivity of the respective species involved.</p> <p>Modelled Yellow-breasted Pipit and Rudd’s Lark habitat areas are considered No-Go zones. These high-quality grassland areas were identified to prevent displacement of birds due to disturbance and habitat destruction. The Yellow-breasted Pipit and Rudd's Lark model output represents the habitat patches most suitable for the species' using a multi-year assessment of</p>

		<p>imagery indices etc. spanning 2019–2023. This is to account for variability related to drivers of habitat suitability for grassland habitat specialist species such as these endemic larks and pipit. Primary drivers of variability include seasonal rainfall across years, burning/fire, and grazing intensity. The model boundaries will extend beyond suitable habitat into other habitats (forest edge, roads, etc.) in some areas as we have accounted for typical blade swept area (BSA) by buffering the habitat output. This output should be considered high sensitivity and avoided (no-go) given habitat loss/degradation is the primary issue. Although Botha’s Larks were not observed on site during the extensive surveys conducted, further investigations regarding habitat suitability will be conducted through modelling during the EIA phase of the project.</p>
<p>3</p>	<p>Furthermore, Intact grassland patches make up a third of the site footprint. DARDLEA does not support the development of WEFs (or any noncontactable land use) within Intact grassland patches. The MBSP specifically incorporated climate change into spatial priorities through the prioritization of the connectivity of remaining intact grassland patches in the province, as they provide habitat for species to thrive, and allow for their dispersal. Intact grasslands are crucial for supporting threatened avifauna.</p>	<p>These high-quality grassland areas already contain many transformed habitats. The proposed development should avoid the high sensitivity areas, therefore the layout will be revised during the EIA phase.</p>
<p>4</p>	<p>DARDLEA is therefore concerned that the proposed location of the Emvelo Wind Energy Facility and associated grid infrastructure is not compatible with the desired land use. The WEF and all associated Infrastructure is not a land use, in accordance With the Mpumalanga Biodiversity Sector Plan (MBSP), that will support the Inherent Biodiversity values of CBAs</p>	<p>While the departments concern is noted, the development of a wind energy facility would allow the IPP to directly enhance the conservation landscape of the area through the implementation of recommended mitigation measures from the various specialists to improve the ecology of the landscape. As such, we feel that the proposed development could support the biodiversity values of the CBAs.</p>
<p>5</p>	<p>It is acknowledged that the layout plan in the draft Scoping Report is preliminary, and that you have confirmed that it will be revised further during the EIA phase to be Informed by buffers and constraints provided by specialists. Such constraints identified to date include the location of turbines in areas Identified in the Faunal Assessment as High Sensitivity and High Sensitivity Escarpment, the location of turbines and associated infrastructure in bat sensitive and bat no- go areas, the location of the laydown area in a sensitive aquatic feature, .and the location of a number of turbines in avifaunal</p>	<p>We appreciate the departments inputs as to the potential risks and impacts associated with the current layout. As noted above, and in our meeting on the 11th of September 2024, the sensitivities identified by the various specialists are being taken into account during the review of the layout that is currently underway. Any additional sensitivities identified will be incorporated into the layout to ensure that the direct and cumulative impacts of the project are minimized.</p>

	<p>exclusion zones. It must be noted though that in addition to the exclusion :zones identified in the specialist studies, a number of turbines as well as associated substation and laydown areas are still be located in Key Biodiversity Areas and IBAs (i.e. turbines 4, 8, 11, 18, 19, 22, 24, 26, 31, 33 and 35), Intact Grassland Patches (including turbines 1-6 9 and 13), and CBA Irreplaceable areas (12, 14, 16, 17, 29, 32 and 33) and CBA optimal areas (8, 18 and 19), which is very concerning.</p>	
<p>6</p>	<p>We are concerned that cumulative impacts will not be dealt with adequately, While the Department of Fisheries, Forestry and the Environment has set a limit of 30km for the assessment of cumulative impacts, this should. be viewed as a minimum requirement. Due to the extremely sensitive habitat within which all wind farms in the region have either been authorized or are currently In process, it is our view that all authorized and in-process wind farms In the Gert Sibande District should be included In the assessment of cumulative Impacts. Currently, the.se include Ujekamanzi WEF 1, Ujekamanzl WEF 2, Ummbila Emoyeni WEF (authorised, and within 55km); Phefumuia Emoyeni WEF (within 40km); Mukondeleil WEF (authorised), Zephyr WEF (within 30km), as well as Camden I ano II, Sheepmoor WEF and Rochdale WEF. The cumulative assessment must, inter al/a, identify the species and habitats most at risk of cumulative impacts, and identify key uncertainties. The definition of cumulative impacts as per the EIA Regulations is "the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may be significant when added to the existing and reasonably foreseeable impacts eventuating from similar or diverse activities". A comparative assessment of the impacts of this proposed facility, in relation to and in conjunction with, adjacent and surrounding renewable energy facilities should therefore be provided in the EIA Report.</p>	<p>As per the DFFE guidelines related to cumulative impacts, all specialists will be requested to provide an assessment of the potential cumulative impacts of the proposed project, and all other renewable energy projects within the prescribed radius, on the environment. These cumulative impact assessments will be incorporated into the EIAR for adjudication during the EIA comment period.</p>
<p>7</p>	<p>Roads must be Included in the draft layout plan, and must be incorporated in the impact analysis.</p>	<p>A refined layout, including all internal roads and other infrastructure, will be submitted following the specialist inputs on the EIA phase.</p>

<p>8</p>	<p>The plan of study for EIA must include and address the following:</p> <p>8.1 Terrestrial Biodiversity:</p> <ul style="list-style-type: none"> ▪ Intact Grassland Patches and Key Biodiversity Areas must be identified and considered in the analysis of impacts on terrestrial biodiversity. ▪ Where Infrastructure is to be developed In CBAs and Intact Grassland Patches, the impact of the loss of CBAs and intact grassland habitat In terms of metapopulation dynamics (i.e. how the loss of source areas Will impact areas of low quality habitat that cannot support a population of species on Its own) must be assessed. ▪ The Site Ecological Importance methodology, as per the requirements of the Species ▪ Environmental Assessment Guidelines, must be demonstrated to have been applied. ▪ The Impact of the potential loss of ecological drivers on ecological processes must be analyzed I.e. fire, which is an important driver for the maintenance of grassland biodiversity. 	<p>The Terrestrial Impact assessment will consider the listed requirements.</p>
<p>8.2</p>	<p>Avifauna: DARDLEA supports the avifaunal specialists' recommendations to remove turbines from the "exclusion zones" identified during pre-construction monitoring. However, in the proposed re-assessment of the layout, the Avifaunal Assessment must consider and include the following:</p>	<p>This comment has been duly noted</p>
	<ul style="list-style-type: none"> ▪ The Birds and Wind-Energy Best-Practice Guidelines state that the duration of pre-construction monitoring should be extended (beyond 12 months) where there is a high risk of significant Impacts on priority species. Sufficient evidence of high risk of significant impact on avifauna on site and within the Project Area of influence exists to extend minimum pre-construction monitoring requirements to adequately assess impacts and determine appropriate mitigation measures. Where the layout of the proposed wind farm does not avoid all sensitive features, corridors and buffers (e.g. CBAs, intact grasslands patches, KBAs, pans and all waterbodies, and provide shaped buffers for such features), additional monitoring must be undertaken to confirm the full 	<p>The monitoring protocol implemented was guided by the following:</p> <ul style="list-style-type: none"> • 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 NEMA when applying for Environmental Authorisation (Gazetted October 2020) • Protocol for the specialist assessment and minimum report content requirements for environmental impacts on avifaunal species by onshore wind energy generation facilities where the electricity output is

spectrum of prevailing environmental conditions to ensure avoidance of significant Impacts,

20MW or more (Government Gazette No. 43110 – 20 March 2020).

- Jenkins, A.R., Van Rooyen, C.S., Smallie, J.J., Anderson, M.D., & A.H. Smit. 2015. Best practice guidelines for avian monitoring and impact mitigation at proposed wind energy development sites in southern Africa. Produced by the Wildlife & Energy Programme of the Endangered Wildlife Trust & BirdLife South Africa. Hereafter referred to as the wind guidelines.

Monitoring at the WEF sites and a Control Site were conducted by a team of experienced avifaunal field specialists during the following time envelopes:

- 21 February–03 March 2022
- 21–27 April 2022
- 01–16 June 2022
- 06–21 October 2022
- 14–17 January 2023
- 05–09 May 2023
- 28–30 June 2023
- 22–26 August 2023

Additional Vantage Point and Transect Count monitoring was conducted near the identified Martial Eagle nest to gain a better understanding of their flight behaviour. Five surveys were conducted, in addition to the seven surveys completed as part of the pre-construction monitoring.

The five additional surveys were conducted during the following time envelopes:

- 17–22 October 2023

		<ul style="list-style-type: none"> • 15–23 November 2023 • 30 November–05 December 2023 • 17–22 January 2024 • 14–20 February 2024
	<ul style="list-style-type: none"> ▪ Intact grassland patches are important habitat for foraging and facilitate avifauna breeding and movement. Intact grassland patches must be considered and incorporated in the analysis of Impact zones applicable to avifauna. 	<p>MTPA intact grassland patches would have to be avoided both from a terrestrial and avifaunal perspective.</p>
	<ul style="list-style-type: none"> ▪ Buffers for waterbodies aquatic features - confirm the rationale in their determination and how their sizes (210m around drainage lines, and 110m around wetland no-go zones) were determined to be sufficient to account for movement of birds through the site, and protection of roosting areas and flight behaviors (approaching and leaving roost sites foraging sites etc). 	<p>The additional 110m (i.e. 210m in total) is to account for the rotor-swept area of the turbines.</p> <p>During the EIA Phase fine scale habitat modelling and identification of wetland corridors for cryptic / low detection probability wetland species will be conducted. Two forms of risk zones will be delineated, namely core breeding habitat, and associated connectivity habitat. Connectivity habitat will include wetland habitats not used for breeding but for movement, as well as wetland/grassland margins. These features will need to be buffered to account for the sensitivity of the respective species involved.</p>
	<ul style="list-style-type: none"> ▪ DARDLEA is especially concerned that the site comprises habitat suitable for species with low detection probability, including the Globally Vulnerable Yellow-breasted Pipit, and Endangered Rudd's Lark, and the Critically Endangered Species 23. The precautionary principle must be applied in the undertaking of comprehensive habitat- based assessments in order to robustly delineate flyways and movement corridors for these species. 	<p>During the EIA phase fine scale habitat modelling and identification of wetland and grassland corridors for cryptic / low detection probability wetland species will be conducted. Two forms of risk zones will be delineated, namely core breeding habitat, and associated connectivity habitat. Connectivity habitat will include wetland and grassland habitats not used for breeding but for movement, as well as wetland/grassland margins. These features will need to be buffered to account for the sensitivity of the respective species involved.</p> <p>No dedicated site surveys were conducted for Sensitive Species 23 as yet – these will be conducted during the EIA phase.</p>

<ul style="list-style-type: none"> Confirmation of compliance with vantage point requirements. Based on our viewshed analysis appears that only 45-50% of the site is covered vs the required 75%, and that some turbines have been located outside of vantage point visibility. 	<p>Vantage points were selected based on their accessibility and the ability to observe the maximum area of the site. The proposed turbine locations covered by vantage points at the Emvelo site is in fact at least 73% and not 45-50% as stated. The locations of these vantage points were also chosen to cover the three WEF sites collectively, achieving a combined coverage of 76%, which meets the minimum requirement stipulated by the BLSA guidelines. Additionally, the vantage point observations were supplemented by five further surveys (total of 60 hours) conducted at various on-site locations to record detailed information on the flight activity of Martial Eagles. During these surveys, the flight behavior of all species of conservation concern was noted and recorded, thereby enhancing the overall coverage and observations from the vantage points on site.</p>
<ul style="list-style-type: none"> DARDLEAs position is that blade painting will be a non-negotiable, compulsory requirement for all authorized wind farms in the province, and Shut Down on Demand (SDoD) would be a compulsory adaptive management requirement. However, since neither of these measures are effective for night flying birds, which have been confirmed on and adjacent to the site, a separate operational impact analysis must be undertaken for "Mortality of priority night flying species due to collisions with the wind turbines", 	<p>Blade patterning (painting) as well as sdod will be a compulsory requirement during the operational phase. Additionally adaptive management for the implementation of additional mitigation measures will also be a requirement during the operational phase.</p> <p>Nighttime vs. Daytime impact ratings will be done separately during the EIA phase.</p> <p>Radar SDoD mitigation to be considered for nighttime mitigation to reduce flamingo and other night flying bird collisions.</p> <p>Nocturnal surveys were not undertaken, however Grass Owl habitat will be modelled as part of the wetland sensitive areas to avoid during the EIA phase.</p>
<ul style="list-style-type: none"> The night-flying greater flamingo was confirmed on site, and there is currently no known technology to mitigate for the collision of night flying birds. 	<p>Flamingo presence and mitigation will be revisited in more detail in the EIA phase.</p> <p>Radar SDoD mitigation to be considered for nighttime mitigation to reduce flamingo and other night flying bird collisions.</p>

	<ul style="list-style-type: none"> Due to the sensitivity of avifauna using the area, and the presence of pans and wetlands on and adjacent to the site, as well as the presence of night-flying birds, tracking data should be acquired to augment the 2D models used. 	<p>Extensive tracking studies are typically not within the scope of an EIA process. The Martial Eagle female is however being satellite tracked to better understand spatial and temporal use of the landscape with the aim of further refining the buffer zones and mitigation measures.</p>
	<ul style="list-style-type: none"> Surveys and tracking should be undertaken to determine the collision risks for nocturnal species, 	<p>Extensive tracking studies are typically not within the scope of an EIA process. But all available data sources will be investigated and integrated in the EIA phase of the project.</p>
	<ul style="list-style-type: none"> A site-specific list of priority avifaunal species for wind farms for this particular region must be developed, which must include all wetland species (noting that the priority species list published by BirdLife South Africa in 2012 does not include most wetland species, and did not Include Mpumalanga). 	<p>Priority species definitions and considerations for the EIA phase will be revisited and where possible all wetland species will be taken into account with a particular focus on species of conservation concern.</p>
	<ul style="list-style-type: none"> Appropriate fatality thresholds (turbine collision, as well as power line collision and electrocution) need to be defined and agreed on within and as part of the EIA process, which must then be incorporated into the Impact analysis. 	<p>Collision Risk Modelling to be conducted during EIA phase.</p>
	<ul style="list-style-type: none"> It Is acknowledged that the Martial Eagle nest turbine no-go buffer Is currently being investigated further with detailed modelling and additional survey work, to inform the final no-go area during the EIA phase. Latest available information from literature, specialists and BirdLife must be consulted during this exercise. This must Include BirdLife's and EWT's recommendations of 5-6km buffer for Martial Eagle nests, noting however that Martial Eagles are known to have large breeding territories, and any buffer must be supported by the birds' actual use of an area. 	<p>A detailed flight risk model has been developed to define a high-risk turbine exclusion buffer around the nest. The flight risk model will be further refined during the EIA phase. Tracking data currently collected by the Endangered Wildlife Trust will be used to better inform the spatial and temporal use of the eagles in the area around the nest to better inform the buffer and further refine the implementation of mitigation measures.</p>
<p>8.3</p>	<p>Bat Assessment</p> <ul style="list-style-type: none"> Appropriate fatality thresholds need to be defined and agreed oh within the EIA process and Incorporated in the impact analysis. Separate mitigation measures need to be considered in more detail for high-flying bat species (i.e. Egyptian Free-TaUed bat) ,1nd lower-level bat species (e.g. Cape Serotine) In the EIA, i.e. different turbine design, blade I rotor sweep size and height, 	<p>The feedback regarding the Bat specialist report is noted and these concerns will be addressed in the Final Bat EIA Report.</p>

	should be investigated for the specific wind turbines located adjacent to areas where these different bat species occur.	
8.4	<p>Microclimate Impact Assessment</p> <ul style="list-style-type: none"> Research has demonstrated that turbines can affect the conditions required for mist formation, and that wind farms warm the land surface, especially at night. Altered microclimates will affect the conditions that support the highveld grasslands. Biodiversity and agricultural potential will potentially be affected. A Microclimate Impact Assessment must be undertaken, which must inform the terrestrial biodiversity study as well as the Agricultural Assessment. The impact of this WEF on the micro- climate, in particular the potential impact on precipitation, soil moisture, soil temperature, etc. therefore also needs to be assessed as part of the EIA. 	We are unaware of any local studies on Microclimate that have shown the same impacts in the South African context. Should you be aware of any local study that has identified land surface warming as an impact of wind energy facilities, please direct us to the appropriate published document.
9	All relevant stakeholders, including but not limited to, Birdlife SA, Mpumalanga Tourism and Parks Agency (MTPA), Gert Sibande District Municipality (GSDM), Department of Agriculture, Land Reform and Rural Development (DALRRD), Department of Public Works, Roads and Transport (DPWRT), and Msukaligwa Local Municipality must be consulted and provided with an opportunity of at least 30 days to submit comments.	All issues raised and comments received during the availability of the DSR have been addressed in the Public Participation Report (Volume III) and in the FSR, as required. Additionally, all the I&APs listed are, or have been added to the I&AP database.
10	The public participation process must be demonstrated to have been conducted in accordance with Regulations 39-44 of the EIA Regulations, 2014 (as amended).	The public participation process for the Emvelo WEF has been conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.
11	Please provide this Department with an opportunity to review and engage with your response to these comments prior to the submission of the final scoping report.	Due to the tight time constraints associated with the EIA regulations, we will not be able to afford DARDLEA an opportunity to re-comment prior to Final Scoping Report Submission. Any additional comments on our responses can be submitted directly to DFFE should they deem them appropriate.
12	We are concerned that the proposed development site is not suitable for the development of wind energy infrastructure, and do not support the layout in its current form.	We appreciate the departments inputs as to the potential risks and impacts associated with the current layout. As noted above, and in our meeting on the 11 th of September 2024, the sensitivities identified by the various specialists are being

taken into account during the review of the layout that is currently underway. Any additional sensitivities identified will be incorporated into the layout to ensure that the direct and cumulative impacts of the project are minimized.

TABLE 7-3 COMMENTS AND RESPONSE TABLE ON NEW APPLICATION FOR DRAFT SCOPING PHASE RECEIVED FROM MTPA (20 SEPTEMBER 2024)

Ref	Comment	Response
1	<p>The sensitivity of the above farm on which the proposed activity is likely to occur was assessed according to the Mpumalanga Biodiversity Sector Plan (MBSP; MTPA, 2014). This sensitivity is assessed in terms of terrestrial and freshwater assessments. In the MBSP, priority sensitive areas are identified in terms of Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs). CBAs and ESAs are deemed to be necessary to ensure protection of biodiversity, environmental sustainability, and human well-being, and are to remain unaltered.</p>	<p>The general comment about the importance of intact grassland patches and CBAs: In this regard, intact grassland habitat and CBAs was considered to classify the constraints map in terms of faunal sensitivity.</p> <p>Once turbine placement and associated roads and other infrastructure are finalized, then one can better assess the site sensitivity of these specific areas and if any ecological processes may be impacted in relation to the animal theme and flagged animal SCC.</p> <p>Any features within aquatic features and buffer zones will be resolved during the EIA phase.</p>
2	<p>According to the MBSP terrestrial assessment map (figure 1) the proposed development will occur within CBA Irreplaceable, CBA Optimal, ESA Landscape corridor, ESA Ecological Corridor, Important Bird Areas (IBA), other natural areas, moderately modified- old lands and heavily modified area (Degraded). According to the freshwater assessments map (figure 2), the proposed development will occur within a CBA Aquatic River, CBA wetlands, ESA wetlands, ESA Strategic water source, ESA Important sub-catchments other natural areas and heavily modified area (Degraded).</p>	<p>Please refer to response above.</p>

3	<p>The MTPA is concerned with the proposed project area for the Emvelo Wind Energy Facility (WEF) and its associated Auxiliary infrastructure which is within Important Bird Areas (IBA), CBA Irreplaceable, CBA optimal, CBA aquatic rivers, ESA wetland clusters, ESA wetlands and intact grasslands. These areas are of biodiversity importance and the proposed Emvelo WEF and associated infrastructure will compromise the primary biodiversity objectives of these areas.</p>	<p>The layout will be revised during the EIA phase to ensure avoidance of these Key Biodiversity Areas as well as the implementation of appropriate mitigation measures.</p>
4	<p>The MTPA is Concerned with A Number Of Turbines That Are In No-Go Areas Or Highly Sensitive Areas. There Are Ten (10) Turbines That Are Located Within the Intact Grasslands Which Are Turbines 1, 2, 3, 4, 5, 6, 7, 9, 13 And 15 (Refer to Figure 3), Intact Grasslands Are Crucial For Supporting Threatened Avifauna And These Turbines Will Compromise That Biodiversity Objective. The Mbsp Specifically Incorporated Climate Change into Spatial Priorities Through The Prioritisation Of The Connectivity Of Remaining Intact Grassland Patches In The Province, As They Provide Habitat For Species To Thrive, And Allow For Their Dispersal.</p>	<p>The specialist supports the recommendation to retain intact grassland areas where possible, and to focus turbine placement and access roads, etc., across low faunal sensitive areas, such as ploughed fields, and other transformed habitat.</p> <p>Intact grassland habitat and CBAs were considered to classify constraints map in terms of faunal sensitivity.</p>
5	<p>Turbines 12, 14, 16, 17, 29, 32 and 33 are within CBA irreplaceable, which is to be maintained in a natural state with no loss of ecosystems, functionality or species with no flexibility in land-use options. turbines 8, 18 and 19 are within CBA optimal which is to be maintained in a natural state with no loss of ecosystems, functionality or species with some flexibility in land-use options.</p>	<p>This comment has been noted. Further ground truthing will be undertaken during the EIA phase to survey the Intact Grassland Patches and confirm CBAs. Habitat mapping will be looked at see where site verification might conclude that it potentially may not intact grassland.</p>
6	<p>Turbines 1,2,3,5, 9, 11, 13, 15, 18, 19, 22, 24, 26, 31, and 35 are located within important bird area (iba). the important bird area (iba) as established by the birdlife sa are areas that has the richness of conservation important bird species and care should be taken not to lose their breeding and feeding habitats. wind turbines increase the risk of bird's collision. surface water (wetlands, drainage lines and dams) is crucially important for priority avifauna, wind turbines and powerlines that that are placed near surface water pose a collision risk (as mentioned by the avifaunal specialist). the most preferred sites are moderately and heavily modified areas; other natural areas are also preferred but under certain conditions.</p>	<p>Habitat suitability modelling has been done for several species of conservation concern and further investigations regarding habitat suitability modelling will be conducted through during the EIA phase of the project. Areas of concern will be avoided during the EIA phase.</p> <p>During the EIA Phase fine scale habitat modelling and identification of wetland corridors for cryptic / low detection probability wetland species will be conducted.</p>

		<p>flight risk models were also developed for species at risk of collisions with turbines (Martial Eagle), and turbines were excluded, or mitigation measures suggested for these.</p> <p>As per communication from BirdLife South Africa (July 2024) it should be noted that IBA's are being replaced by Key Biodiversity Areas (KBA's).</p>
<p>7</p>	<p>The Proposed Emvelo WEF And Its Associated Grid Connection Is Located In An Area Comprising A High Diversity Of Threatened Bird Species, Including The Following Confirmed On Site: African Marsh Harrier (Regionally Endangered); Martial Eagle (Globally And Regionally Endangered); Denham's Bustard (Globally Near Threatened, Regionally Vulnerable); Secretary Bird (Globally Endangered, Regionally Vulnerable); White- Bellied Bustard (Regionally Vulnerable), Blue Crane (Globally Vulnerable, Regionally Near Threatened); Grey Crowned Crane (Globally And Regionally Endangered); Lanner Falcon (Regionally Vulnerable); Greater Flamingo (Regionally Near Threatened); Southern Bald Ibis (Regionally And Globally Vulnerable); Cape Vulture (Globally Vulnerable And Regionally Endangered}; And Yellow-Breasted Pipit (Regionally And Globally Vulnerable}.</p>	<p>Agreed, as per findings of the avifaunal specialist report.</p> <p>During the EIA Phase fine scale habitat modelling and identification of wetland corridors for cryptic / low detection probability wetland species will be conducted. Two forms of risk zones will be delineated, namely core breeding habitat, and associated connectivity habitat. Connectivity habitat will include wetland habitats not used for breeding but for movement, as well as wetland/grassland margins. These features will need to be buffered to account for the sensitivity of the respective species involved.</p> <p>Modelled Yellow-breasted Pipit and Rudd's Lark habitat areas are considered No-Go zones. These high-quality grassland areas were identified to prevent displacement of birds due to disturbance and habitat destruction. The Yellow-breasted Pipit and Rudd's Lark model output represents the habitat patches most suitable for the species' using a multi-year assessment of imagery indices etc. spanning 2019–2023. This is to account for variability related to drivers of habitat suitability for grassland habitat specialist species such as these endemic larks and pipit. Primary drivers of variability include seasonal rainfall across years, burning/fire, and grazing intensity. The model boundaries will extend beyond suitable habitat into other habitats (forest edge, roads, etc.) in some areas as we have accounted for typical blade swept area (BSA) by buffering the habitat output. This output should be considered high sensitivity and avoided (no-go) given habitat loss/degradation is the primary issue. Although Botha's Larks were not observed on site during the extensive surveys conducted, further investigations regarding habitat suitability will be conducted through modelling during the EIA phase of the project.</p>
<p>8</p>	<p>Turbines 1, 2, 3, 5, 7, 9, 13 And 15 Are Within The 5km Martial Eagle Buffer, Birdlife South Africa Currently Recommends 5-6 Km Buffer for Martial Eagles, This 5km No-Go Buffer Must Be Adhered To By The Applicant.</p>	<p>The turbines located within the buffer zone for Martial Eagles will be removed, hence a revised layout will be produced during the EIA phase.</p>

9	<p>The MTPA would like to recommend the following:</p> <p>Key biodiversity areas should be avoided, and Wind turbines removed from such.</p> <ul style="list-style-type: none"> • A 100m buffer around wetlands and other waterbodies must be implemented and adhered to throughout the lifecycle of the proposed development. • 5km radius Martial Eagle Buffer (as recommended by BirdlifeSA} must be implemented and avoided throughout the lifecycle of the proposed development. • A Thorough Terrestrial Biodiversity assessment which also includes Intact grasslands patches. • A thorough Avifaunal study must be done with all the best practices to avoid the bird collision risks. • Proper mitigation strategies of the wind turbines to avoid collisions and mortalities must be included in the EIAr. • The roads, temporary site camps and all the other associated infrastructure must be included on the site layout of the Emvelo WEF in the EIAr. • The Applicant must find a more suitable alternative site for this development with less risk to biodiversity. • The clearance or removal of vegetation must be restricted to the project footprint. • Moderately modified- old lands and heavily modified areas (Degraded} are the most preferred sites for the Emvelo WEF, other natural areas are also preferred but under certain conditions. • The applicant must apply duty of care to ensure that there is no significant pollution or degradation of the environment. 	<p>Recommendations provided will included in the Impact Assessment, accordingly.</p> <p>5km radius Martial Eagle Buffer (as recommended by BirdlifeSA} must be implemented and avoided throughout the lifecycle of the proposed development. Response:</p> <ul style="list-style-type: none"> • Due to the discovery of a Martial Eagle nest within the proposed WEF project footprints, extensive additional monitoring was performed to collect flight data of the adult eagles and the juvenile in the area. 37 hours, 34 minutes and 11 seconds of Martial Eagle flight time was recorded during an additional 60 hours of observation time conducted in the area. The extensive dataset of Martial Eagle flight data was used to develop a flight risk model. High-quality grassland areas were also identified to prevent displacement of sensitive grassland birds due to disturbance and habitat destruction. <p>A thorough Avifaunal study must be done with all the best practices to avoid the bird collision risks. Response:</p> <ul style="list-style-type: none"> • Noted – a comprehensive avifaunal impact assessment study is underway. <p>Proper mitigation strategies of the wind turbines to avoid collisions and mortalities must be included in the EIAr. Response:</p> <ul style="list-style-type: none"> • An Avifaunal EMPR has been included as Appendix 7 & 8
10	<p>The MTPA does not support the Environmental Authorisation of the proposed Emvelo Wind Energy Facility (Ply} Ltd for proposed Wind Energy Facility and Auxiliary infrastructure operation within the application area with up to 45 proposed wind turbines. The sensitive areas cover most of the proposed Emvelo WEF project area, Important Birds Area (IBA} covers 43% of the project area; Key Biodiversity Areas (KBA} Covers 21.4% of the project area; Critical Biodiversity Areas (CBA} covers 1,302.2 ha of the project area; and 2,272.5 ha of intact grassland patches within the project area.</p>	<p>The layout will be revised during the EIA phase</p>

TABLE 7-4 COMMENTS AND RESPONSE TABLE ON NEW APPLICATION FOR DRAFT SCOPING PHASE RECEIVED FROM BIODIVERSITY CONSERVATION (13 AUGUST 2024)

Ref	Comment	Response
1	<p>COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED MULILO AMSTERDAM WEFS CLUSTER, NEAR ERMELO, MPUMALANGA PROVINCE</p> <p>The Directorate: Biodiversity Conservation has reviewed and evaluated the reports and does not have any objection to the draft Scoping Reports and the Plan of Study for EIA. Kindly note that the EIA report must comply with the 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.</p> <p>The Environmental Impact Assessment report must comply with all the requirements as outlined in the Environmental Impact Assessment (EIA) guideline for renewable energy projects and the Best Practice Guideline for Birds & Wind Energy for assessing and monitoring the impact of wind energy facilities on birds in Southern Africa.</p> <p>In conclusion, all Public Participation Process documents related to Biodiversity EIA for review and queries should be submitted to the Directorate: Biodiversity Conservation at Email; BCAdmin@environment.gov.za for the attention of Mr. Seoka Lekota.</p>	<p>The EAP acknowledges the comment from the Department and notes their response in terms of compliance with EIA regulations and Best Practice Guideline for Birds & Wind Energy for assessing and monitoring the impact of wind energy facilities on birds in Southern Africa.</p>

TABLE 7.4 COMMENTS AND RESPONSE TABLE (PREVIOUSLY WITHDRAWN APPLICATION)

Ref	Name and Organisation	Date and Method	Phase of PPP	Comment	Response
1	Nrateng Mashiloane Aviation Environmental	23 July 2024 Per email	Draft Scoping Phase	From: [REDACTED]	

	Compliance Department		<p>[REDACTED]</p> <p>Subject: RE: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga</p> <p>Good day,</p> <p>I hope this email finds you well. Kindly note that the SACAA has transferred all obstacle assessments and applications responsibilities to Air Traffic and Navigation Services (ATNS) as published on the SACAA website: www.caa.co.za/industryinformation/obstacles/ . A formal application must be lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. The list and contact details of the approved obstacles assessment services providers can be obtained from the CAA website: www.caa.co.za.</p> <p>Kind regards,</p>	
2	John Geeringh National Transmission Company South Africa SOC Ltd (NTCSA)	23 July 2024 Per email	<p>Draft Scoping Phase</p> <p>From: [REDACTED]</p> <p>Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga</p> <p>Please send me KMZ files of the proposed developments and grid connection. Please find attached Eskom requirements for work at or near Eskom infrastructure and servitudes, as well as a setbacks guideline for RE Developments.</p> <p>Kind regards</p>	<p>From: [REDACTED]</p> <p>Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga</p> <p>Dear John,</p> <p>Thank you for your e-mail. Please find attached a KMZ file of each WEF.</p> <p>Thank You Kind Regards</p>

3	Lydia Kutu Department of Forestry, Fisheries and the Environment (DFFE) Integrated Environmental Authorisations	24 July 2024 Per email	Draft Scoping Phase	<p>From: [Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>Subject: 14/12/16/3/3/2/2591 Dear Sir/Madam ACKNOWLEDGEMENT OF RECEIPT OF THE NEW APPLICATION FORM AND DRAFT SCOPING REPORT FOR THE PROPOSED CARLETONVILLE SOLAR PHOTOVOLTAIC PLANT AND ASSOCIATED INFRASTRUCTURE ON REMAINDER OF FARM TWYFELVLAKTE NO. 105, MERAFAONG CITY LOCAL MUNICIPALITY, WEST RAND DISTRICT MUNICIPALITY, GAUTENG PROVINCE. The Department confirms having received the Application Form and Draft Scoping Report for Environmental Authorisation for the abovementioned project on 22 July 2024. You have submitted these documents to comply with the Environmental Impact Assessment (EIA) Regulations, 2014, as amended. Kindly note that your application for Environmental Authorisation falls within the ambit of an application applied for in terms of Part 3 of Chapter 4 of the EIA Regulations, 2014, as amended. You are therefore referred to Regulation 21 of the EIA Regulations, 2014 as amended. Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states</p>	EAP acknowledge that this was an unintended error of acknowledgement. DFFE had subsequently attempted to redact this message.
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				<p>that potential Interested & Affected Parties, including the Competent Authority, may be provided with an opportunity to comment on reports and plans contemplated in Regulation 40(1) of the EIA Regulations, 2014, as amended, prior to the submission of an application but must be provided an opportunity to comment on such reports once an application has been submitted to the Competent Authority. Note that in terms of Regulation 45 of the EIA Regulations, 2014, as amended, this application will lapse if the applicant fails to meet any of the time-frames prescribed in terms of these Regulations, unless an extension has been granted by the Department in terms of Regulation 3(7) of the EIA Regulations, 2014, as amended.</p> <p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.</p> <p>Kind Regards,</p>	
4	Lydia Kutu Department of Forestry, Fisheries and the Environment (DFFE) Integrated Environmental Authorisations	24 July 2024 Per email	Draft Scoping Phase	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>Subject: 14/12/16/3/3/2/2592</p> <p>Dear Sir/Madam</p>	The EAP acknowledges the receipt of the Draft Scoping report to the department

ACKNOWLEDGEMENT OF RECEIPT OF THE NEW APPLICATION FORM AND DRAFT SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE ROCHDALE WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, INCLUDING A GRID CONNECTION, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, AND GERT SIBANDE DISTRICT MUNICIPALITY, MPUMALANGA PROVINCE.

The Department confirms having received the Application Form and Draft Scoping Report for Environmental Authorisation for the abovementioned project on 22 July 2024. You have submitted these documents to comply with the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.

Kindly note that your application for Environmental Authorisation falls within the ambit of an application applied for in terms of Part 3 of Chapter 4 of the EIA Regulations, 2014, as amended. You are therefore referred to Regulation 21 of the EIA Regulations, 2014 as amended.

Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states that potential Interested & Affected Parties, including the Competent Authority, may be provided with an opportunity to comment on reports and plans contemplated in Regulation 40(1) of the EIA Regulations, 2014, as amended, prior to the submission of an application but must be provided an opportunity to comment on such reports once an application has been submitted to the Competent Authority.

Note that in terms of Regulation 45 of the EIA Regulations, 2014, as amended, this application will lapse if the applicant fails to meet any of

				<p>the time-frames prescribed in terms of these Regulations, unless an extension has been granted by the Department in terms of Regulation 3(7) of the EIA Regulations, 2014, as amended.</p> <p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.</p> <p>Kind Regards,</p>
5	<p>Lydia Kutu Department of Forestry, Fisheries and the Environment (DFFE) Integrated Environmental Authorisations</p>	<p>24 July 2024 Per email</p>	<p>Draft Scoping Phase</p>	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>Subject: 14/12/16/3/3/2/2591 Dear Sir/Madam</p> <p>ACKNOWLEDGEMENT OF RECEIPT OF THE NEW APPLICATION FORM AND DRAFT SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE EMVELO WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, AND GERT SIBANDE DISTRICT MUNICIPALITY, MPUMALANGA PROVINCE.</p> <p>The Department confirms having received the Application Form and Draft Scoping Report for</p>

Environmental Authorisation for the abovementioned project on 22 July 2024. You have submitted these documents to comply with the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.

Kindly note that your application for Environmental Authorisation falls within the ambit of an application applied for in terms of Part 3 of Chapter 4 of the EIA Regulations, 2014, as amended. You are therefore referred to Regulation 21 of the EIA Regulations, 2014 as amended.

Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states that potential Interested & Affected Parties, including the Competent Authority, may be provided with an opportunity to comment on reports and plans contemplated in Regulation 40(1) of the EIA Regulations, 2014, as amended, prior to the submission of an application but must be provided an opportunity to comment on such reports once an application has been submitted to the Competent Authority.

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

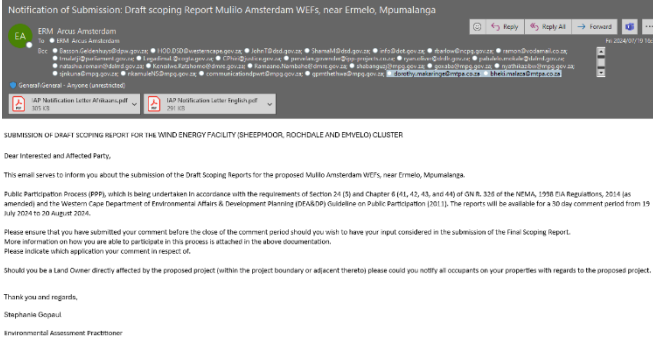
You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

				<p>Kind Regards,</p>	
<p>6</p>	<p>Lydia Kutu Department of Forestry, Fisheries and the Environment (DFFE) Integrated Environmental Authorisations</p>	<p>24 July 2024 Per email</p>	<p>Draft Scoping Phase</p>	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>Subject: 14/12/16/3/3/2/2593 Dear Sir/Madam</p> <p>ACKNOWLEDGEMENT OF RECEIPT OF THE NEW APPLICATION FORM AND DRAFT SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE SHEEPMOOR WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, AND GERT SIBANDE DISTRICT MUNICIPALITY, MPUMALANGA PROVINCE.</p> <p>The Department confirms having received the Application Form and Draft Scoping Report for Environmental Authorisation for the abovementioned project on 22 July 2024. You have submitted these documents to comply with the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.</p> <p>Kindly note that your application for Environmental Authorisation falls within the ambit of an application applied for in terms of Part 3 of Chapter 4 of the EIA Regulations, 2014, as amended. You are therefore referred</p>	<p>The EAP acknowledges the receipt of the Draft Scoping report to the department</p>

				<p>to Regulation 21 of the EIA Regulations, 2014 as amended.</p> <p>Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states that potential Interested & Affected Parties, including the Competent Authority, may be provided with an opportunity to comment on reports and plans contemplated in Regulation 40(1) of the EIA Regulations, 2014, as amended, prior to the submission of an application but must be provided an opportunity to comment on such reports once an application has been submitted to the Competent Authority.</p> <p>Note that in terms of Regulation 45 of the EIA Regulations, 2014, as amended, this application will lapse if the applicant fails to meet any of the time-frames prescribed in terms of these Regulations, unless an extension has been granted by the Department in terms of Regulation 3(7) of the EIA Regulations, 2014, as amended.</p> <p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.</p> <p>Kind Regards</p>
7	Tebego Kgaphola Department of Forestry, Fisheries & the Environment	29 July 2024 Per email	Draft Scoping Phase	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>Subject: RE: Notification of Submission: Draft</p>

				<p>scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga Dear Sir/Madam</p> <p>DFFE Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation to review and comment on the project mentioned on the subject line. Kindly note that the project has been allocated to Mrs P Makitla and Ms Tebego Kgaphola (Copied on this email). In addition, kindly share the shapefiles of the development footprints/application site with the Case Officers.</p> <p>Please note: All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@dffe.gov.za for attention of Mr Seoka Lekota</p>	
8	Josua Meyer Aida Form entry	30 July 2024 Per email	Draft Scoping Report	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>Subject: Fwd: SHEEPMOOR, EMVELO WIND ENERGIE PROJEKTE VERSOEK VORM OM TE REGISTREER AS BELANGHEBBENDE PARTY OP BOGEMELDE PROJEKTE sodat kommentaar gelewer kan word. Het nie rekening op aida om aanlyn te registreer nie en die foon nommer 011-798 5400 is foutief. Waardeer</p>	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>Subject: RE: SHEEPMOOR, EMVELO WIND ENERGIE PROJEKTE Good day, Thank you for your comment, you will now be added to the I&AP database. Below is a link to the Aida form, there will be no need to register in order to fill out the form:</p> <p>https://mulilowef.aidaform.com/public-participation-form Thank you,</p>

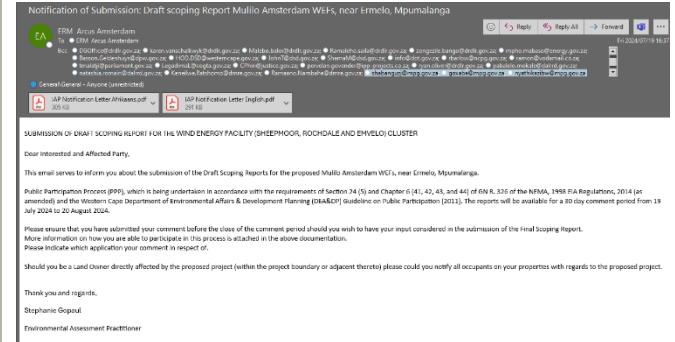
9	John Geeringh National Transmission Company South Africa SOC Ltd (NTCSA)	31 July 2024 Per email	Draft Scoping Report	<p>From: [REDACTED]</p> <p>Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga</p> <p>Thanks, they will have to relook at their turbine layouts with regards to the setbacks requirements of 3 x tip height from TX lines and 1 x tip height from Dx lines. Lines connecting to power stations are extremely sensitive and chance are we may no grant setbacks relaxation. Regards</p>	<p>From: [REDACTED]</p> <p>Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga Hi John,</p> <p>Thank you for your email.</p> <p>The layout will be revised, taking into account the WTG's that are within the proximity of the existing transmission lines. We will ensure that these turbines are 3x the Tip height from existing Electrical infrastructure.</p> <p>Kind Regards,</p>
10	Josua Meyer Interested and Affected Party	31 July 2024 Per email	Draft Scoping Report	<p>From: [REDACTED]</p> <p>Subject: VOORGESTELDE ERMELO WINDPLASE Plasing, groottes van turbines onduidelik Versoek duidelike kaart waar turbines geplaas gaan word. Eiendom grense en distrikspaaie moet duidelik getoon word.</p>	<p>From: [REDACTED]</p> <p>Subject: RE: VOORGESTELDE ERMELO WINDPLASE Good day,</p> <p>Kindly see attached Layout of Proposed WEF's. Additional information on the project can be found in the link below:</p> <p>https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/</p> <p>Kind Regards,</p>

<p>11</p>	<p>Robyn Luyt Director: Environmental Impact Management (EIM) DARDLEA</p>	<p>03 August 2024 Per email</p>	<p>Draft Scoping Report</p>	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>Subject: Consultation Mlulo Wind Farms Mpumalanga Importance: High Good day Ms Gopaul,</p> <p>It has come to our attention, and not via any official notification from ERM, that draft Scoping Reports for the following wind farms proposed in the Gert Sibande District in Mpumalanga Province are out for public comment from 19 July 2024 to 20 August 2024 (as per ERM website), where ERM is the EAP:</p> <ol style="list-style-type: none"> 1. Shepmore WEF 2. Emvelo WEF 3. Rochdale WEF <p>Neither DARDLEA nor MTPA have been consulted to date, nor have we received copies of any of the draft Scoping Reports. Aside from the requirements of the EIA Regulations, DARDLEA and MTPA have through internal arrangements with DFFE requested to be included in all pre-application consultations for Renewable Energy projects in Mpumalanga, particularly wind energy facilities. DARDLEA and MTPA must be included during all pre-application meetings and in all in-process consultations.</p>	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>Subject: RE: Consultation Mlulo Wind Farms Mpumalanga Good day Robyn,</p> <p>Please note that DARDLEA and MTPA were notified regarding the PP for the Draft scoping Phase on the 19th July 2024. Kindly see proof of notification below:</p> 
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For the purpose of commenting on draft reports during the regulatory periods, we request that hard copies of all reports are submitted to Ms Sindi Mbuyane in our Ermelo office (where projects are located in the Gert Sibande District), and sent electronically to me via WeTransfer. Please also ensure that MTPA receives the reports in the manner requested by them. For your records I include the contact details of all relevant officials to be consulted in DARDLEA (when an application is in the Gert Sibande District) and MTPA:

DAR DLEA	DESIGNATI ON	EMAIL	PHON E
Roby n Luyt	Director: Environme ntal Impact Managem ent (EIM)	[REDACTED]	[REDACTED]
Sindi siwe Mbuy ane	Deputy Director: EIM Gert Sibande District	[REDACTED]@gov.za	[REDACTED]
Gavi n Cowd en	Deputy Director: Environme ntal Policy, Planning and Coordinatio n	[REDACTED]@pg.gov.za	[REDACTED]
MTPA	DESIGNATI ON	EMAIL	PHON E
Merv yn Lotte r	Manager: Biodiversity Planning	[REDACTED]	[REDACTED]



If required, we will send through hard copies and also resend to the below contacts and will update our I&AP database accordingly. Additionally, kindly note that PPP for the Mulilo Wind Energy Farm in Mpumalanga closes the 20th of August 2024.

				<table border="1"> <tr> <td>Frans Krige</td> <td>Land Use Advisor</td> <td rowspan="3">[Redacted]</td> <td rowspan="3">[Redacted]</td> </tr> <tr> <td>Khumalo Malele</td> <td>Land Use Advisor</td> </tr> <tr> <td>Celia de Waal</td> <td>EIA Data Capturer LUA</td> </tr> </table> <p>Please note that time frames for commenting on draft reports can only commence on the date that hard copies of the reports are received, and we request that our 30 day time frame aligns with DFFE's.</p> <p>Kind Regards Robyn</p>	Frans Krige	Land Use Advisor	[Redacted]	[Redacted]	Khumalo Malele	Land Use Advisor	Celia de Waal	EIA Data Capturer LUA	
Frans Krige	Land Use Advisor	[Redacted]	[Redacted]										
Khumalo Malele	Land Use Advisor												
Celia de Waal	EIA Data Capturer LUA												
12	Celia de Waal Mpumalanga Tourism and Parks	06 August 2024 Per email	Draft Scoping Report	<p>From: [Redacted]</p> <p>Subject: FW: Register for the Zephyr WEF Meeting and site visit Good morning</p> <p>Kindly send us, the MTPA, hard copies of the 3 Wind Farm reports, for our Scientists to comment on, to the following physical address:</p> <p>To: Cecilia de Waal (EIA Data Capturer) MTPA Office Building (Lydenburg)</p>	<p>From: [Redacted]</p> <p>Subject: RE: Consultation Mlulio Wind Farms Mpumalanga Good day Cecilia,</p> <p>Thank you for your email. The reports are on their way to the below address as we speak.</p> <p>Kind Regards,</p>								

End of Morgan street
Lydenburg 1120

My contact details [REDACTED] 065 [REDACTED]
[REDACTED]

Kind regards

Celia de Waal

From: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: FW: Register for the Zephyr WEF Meeting and site visit

Hi there

Christophe sent me the attached KML file and the below links. I see these are links to scoping reports dated 19 July 2024. They seem to have started with the application process while not yet consulting us.

Celia, could you please write to ERM to request copies of the three wind farm documents for comment.

Robyn/Sindy, you may want to do the same.

I have updated our webmap with these latest boundaries from the KML file.

Best wishes
Mervyn

From: [REDACTED]
[REDACTED]

Subject: RE: Register for the Zephyr WEF Meeting and site visit

Hi Mervyn,

Many thanks for reaching out.

Please find attached the kmz of the Mullilo WEF projects in Mpumalanga.

Please also find below the publicly available documents for their respective projects

https://www.sustainability.com/globalassets/documents/proposed-amsterdam/0684401_sheepmoor-wef-dsr.pdf

https://www.sustainability.com/globalassets/documents/proposed-amsterdam/0684401_emvelo-wef-dsr.pdf

https://www.sustainability.com/globalassets/documents/proposed-amsterdam/0684401_rochdale-wef-dsr.pdf

I hope this helps.

Kind regards,

Christophe

From: [REDACTED]
[REDACTED]
[REDACTED]: Register for the Zephyr WEF Meeting and site visit

EXTERNAL MAIL
Hi Christophe

Thank you for writing. Would you please send me an image or shapefile for the Mulilo WEF boundaries when you get a chance?

Best wishes
Mervyn

From: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: RE: Register for the Zephyr WEF Meeting and site visit

Good afternoon everyone,

Thank you so much for your time and very valuable feedback and recommendations.

Ryan and I are now back in Cape Town and addressing your comments.

We have liaised back with our EAP and will provide you with further information shortly.

Thanks again for taking the time to meet with us and for the transparency, we highly appreciate it.

I will be sending a couple of emails in the next few days in line with our engagement.

Kind regards,

Christophe

From:

Subject: Register for the Zephyr WEF Meeting and site visit

EXTERNAL MAIL
Good day All,

Find attached for your attention.

Kind Regards,

Sindisiwe Mbuyane
EAPASA Reg: 2021/3509, IAIAsa 2040304

				[REDACTED]	
13	Celia de Waal Mpumalanga Tourism and Parks	06 August 2024 Per email	Draft Scoping Report	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>Subject: RE: Consultation Mlulio Wind Farms Mpumalanga Thank you</p>	
14	Robyn Luyt Director: Environmental Impact Management (EIM) DARDLEA	10 August 2024 Per email	Draft Scoping Report	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>Subject: Re: RE: Consultation Mlulio Wind Farms Mpumalanga Good afternoon, Please confirm whether you received the below email - I have deleted all graphics from the email thread to ensure this reaches you. Regards Robyn</p> <p>>>> Robyn Luyt 08/11/24 9:51 AM >>> Good day Stephanie,</p> <p>As of 8 August 2024, neither DARDLEA nor MTPA have received draft Scoping Reports to review and comment on, nor have we received a response to the email below.</p>	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>Subject: RE: RE: Consultation Mlulio Wind Farms Mpumalanga</p> <p>Good day Robyn,</p> <p>Emails have been received and responded to. Please see attached response.</p> <p>Kind Regards</p> <p><i>NOTE:</i> <i>Post concerns expressed from DARDLEA/MTPA. The previous draft applications were withdrawn and the</i></p>

			<p>Kind Regards Robyn</p> <p><i>Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293) Director: Environmental Impact Management Department of Agriculture, Rural Development, Land & Environmental Affairs Mpumalanga Provincial Government Riverside Office Park, Aqua Street (Cycad Building - Block 4) Nelspruit, 1200 Tel: 013 759 4000 Email: rluyt@mpg.gov.za</i></p> <p>>>> Robyn Luyt 08/07/24 9:41 AM >>> Good day Stephanie,</p> <p>Be advised that the names of the officials at MTPA that you have highlighted in your below notification are not the relevant officials that are required to be notified or the relevant officials that must review and comment on draft Scoping or EIA reports, or any reports related to an EIA process. There are also no officials in the list of officials in your screenshots that are in the Environmental Affairs Chief Directorate in MDARDLEA - as far as I am aware they are in the section that deals with Agriculture, which is an entirely different mandate.</p> <p>It would not be acceptable to not provide the commenting authority the mandatory 30 days to review and comment on draft reports, especially in light of the fact that there has been no prior notification. The Directorate Environmental Impact Management within DARDLEA represents the MEC as Competent Authority in Mpumalanga, and the commenting</p>	<p><i>entire process restarted to afford all IAPs 30 days commenting period.</i></p>
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				<p>authority in respect projects administered by DFFE. MTPA has the mandate for biodiversity matters on behalf of DARDLEA. As per my email to you below (3 August), hard copies of all reports must be submitted to Ms Mbuyane (Environmental Impact Management) at our Ermelo office, and the documents must be made available to me (and in this instance to Mr Cowden and Mr Lotter) electronically at the same time. You will need to contact Ms De Waal and Mr Krige at MTPA to confirm how documents must be submitted to MTPA. Please provide shape files of the 3 proposed WEFs as well.</p> <p>Regards Robyn</p>
15	<p>Robyn Luyt Director: Environmental Impact Management (EIM) DARDLEA</p>	<p>10 August 2024 Per email</p>	<p>Draft Scoping Report</p>	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>Subject: Re: RE: RE: Consultation Mlulio Wind Farms Mpumalanga Importance: High</p> <p>Good day,</p> <p>Please see my email response to you on 7 August as per below email thread. I have not had a response and we still await the draft reports for commenting. Please urgently advise how this is being addressed. I have just had an email from MTPA stating that you are busy sending them the draft reports. Please confirm when I will receive a link to the reports, and when our Ms Mbuyane will receive the hard copies. Please also confirm that we (both</p>

				<p>DARDLEA and MTPA) will be provided with the mandatory 30 days to comment.</p> <p>Should you wish to discuss this further please call me on [REDACTED]</p> <p>Regards Robyn</p>	
16	<p>Tebego Kgaphola Directorate: Biodiversity Mainstreaming and EIA</p>	<p>12 August 2024 Per email</p>	<p>Draft Scoping Phase</p>	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>Subject: RE: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga Good day</p> <p>Kindly share the link for the below project.</p>	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>Subject: RE: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga Good day Tebego,</p> <p>Please see below link to the proposed project:</p> <p>https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/</p> <p>Kindly navigate to the bottom of the page to download all reports and additional documentation related to the project.</p> <p>Kind Regards</p>
17	<p>Robyn Luyt Director: Environmental Impact Management (EIM) DARDLEA</p>	<p>12 August 2024 Per email</p>	<p>Draft Scoping Report</p>	<p>From: [REDACTED]</p> <p>[REDACTED]</p>	<p>From: [REDACTED]</p> <p>[REDACTED]</p>

				<p>Farms Mpumalanga Importance: High Dear Lucien,</p> <p>Our telephone discussion this morning refers.</p> <p>I just wanted to confirm what we discussed in writing, ie. that MTPA and DARDLEA are different entities, and that MTPA and DARDLEA must each get reports for commenting. You confirmed that you dispatched documents to Ms Celia de Waal in Lydenburg last week (to arrive this week). Note that as per the table below, Ms de Waal will receive the documents for MTPA. DARDLEA must therefore still be provided with the documents. Hard copies to Ms Mbuyane at our Ermelo office, and a link to be sent to me. Please also send me the shapefiles. I have understood that you will be discussing this with your client and with Ms Gopaul, and that ERM would revert to me.</p> <p>Please see page 2 of our application form attached where you will find the physical address of our Ermelo office (Gert Sibande District).</p> <p>Kind Regards Robyn</p>	<p>Subject: RE: RE: RE: Consultation Mlulio Wind Farms Mpumalanga Hi Robyn,</p> <p>Thank you for your call earlier. I wanted to inform you that we sent out the notification to all IAPs on July 19th, 2024. We are currently in the process of couriering the Draft Scoping Reports to Sindiswe Mbuyane in Ermelo.</p> <p>We would greatly appreciate it if you could review the reports within the current PPP period. Additionally, we have added you to the IAP database for the Full Scoping and EIA Phase to afford you an opportunity to comment. We are keen to have you onboard and to ensure that you are up to speed with the proposed project, we would be happy to set up a call at your convenience.</p> <p>We understand that you may not have received the reports yet, but if you could review them at your earliest convenience, it would be greatly appreciated. Below is a link to the electronic copies of the reports and attached the shapefiles of the development for your review.</p> <p>https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/</p> <p>Please let me know if you would like to discuss this further or if you have any questions.</p>
18	Bathandwa Ncube DFFE	12 August 2024 Per email	Draft Scoping Report	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	

Cc: [REDACTED]

Subject: 14/12/16/3/3/2/2591; 2592; 2593:
Proposed Emvelo, Rochdale and Sheepmoor
WEFs, MP
Goodday Lucien

14/12/16/3/3/2/2591: THE PROPOSED
DEVELOPMENT OF THE EMVELO WIND ENERGY
FACILITY AND AUXILIARY INFRASTRUCTURE,
NEAR ERMELO, WITHIN THE MSUKALIGWA
LOCAL MUNICIPALITY, MPUMALANGA PROVINCE

14/12/16/3/3/2/2592: THE PROPOSED
DEVELOPMENT OF THE ROCHDALE WIND
ENERGY FACILITY AND AUXILIARY
INFRASTRUCTURE, INCLUDING A GRID
CONNECTION, NEAR ERMELO, WITHIN THE
MSUKALIGWA LOCAL MUNICIPALITY,
MPUMALANGA PROVINCE

14/12/16/3/3/2/2593: THE PROPOSED
DEVELOPMENT OF THE SHEEPMOOR WIND
ENERGY FACILITY AND AUXILIARY
INFRASTRUCTURE, NEAR ERMELO, WITHIN THE
MSUKALIGWA LOCAL MUNICIPALITY,
MPUMALANGA PROVINCE

The application and draft Scoping Report (SR)
for Environmental Authorisation received by the
Department on 22 July 2024 refers.

Following our telephone conversation earlier
today regarding the public participation
process, please be informed that comments on
the draft Scoping Report (SR) are due to you on
22 August 2024. It is noted that there are
organs of state who have jurisdiction in respect

				<p>of the proposed activity, which requires that they be added to the I&AP Database and given an opportunity to comment on the draft SR.</p> <p>The applicant is requested to submit the final SR to the Department on or before the due date (05 September 2024) and may submit comments from MTPA and DARDLEA as addendums, subsequent to the submission of the final SR to the Department.</p> <p>MTPA and Mpumalanga DARDLEA are requested to cc this Department when submitting comments to the EAP.</p> <p>Kind regards</p>	
19	ERM Arcus Amsterdam Mailbox	12 August 2024 Per Email	Draft Scoping Phase		<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>Subject: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga Hi Bheki,</p> <p>Our telephonic discussion earlier refers. Understandably, you mentioned IT related issues in terms of receiving e-mails and forwarding them, hence I have copied your gmail address as requested.</p> <p>Please see below notification that was sent on the 19th of July 2024.</p>

SUBMISSION OF DRAFT SCOPING REPORT FOR THE WIND ENERGY FACILITY (SHEEPMOOR, ROCHDALE AND EMVELO) CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft Scoping Reports for the proposed Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30 day comment period from 19 July 2024 to 20 August 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final Scoping Report. More information on how you are able to participate in this process is attached in the above documentation.

Please indicate which application your comment in respect of.

Should you be a Land Owner directly affected by the proposed project (within the project boundary or adjacent thereto) please could you notify all occupants on your properties with regards to the proposed project.

Thank you and regards,
Stephanie Gopaul
Environmental Assessment Practitioner

20	Celia de Waal Mpumalanga Tourism and Parks	13 August 2024 Per email	Draft Scoping Phase	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>Subject: MTPA Acknowledgement of receipt RE: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP Good day Stephanie</p> <p>The MTPA acknowledge the receipt of the following 3 documents. It was delivered yesterday 12 August 2024.</p> <p>14/12/16/3/3/2/2591: THE PROPOSED DEVELOPMENT OF THE EMVELO WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE</p> <p>14/12/16/3/3/2/2592: THE PROPOSED DEVELOPMENT OF THE ROCHDALE WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, INCLUDING A GRID CONNECTION, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE</p> <p>14/12/16/3/3/2/2593: THE PROPOSED DEVELOPMENT OF THE SHEEPMOOR WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE</p>	The EAP acknowledges the receipt of the DSRs to the department
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				<p>MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE</p> <p>The commenting scientist is Mr. Frans Krige who is copied in this e-mail.</p>	
21	<p>Robyn Luyt Director: Environmental Impact Management (EIM) DARDLEA</p>	<p>13 August 2024 Per email</p>	<p>Draft Scoping Report</p>	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>Subject: Re: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP Importance: High Good Morning all,</p> <p>I am extremely concerned with the agreement reached between ERM and DFFE. DARDLEA, as the Provincial Department responsible for environmental affairs in Mpumalanga Province, has to date not yet received any of the draft documents for review and comment. In accordance with the requirements of Regulation 40(1)(b), the scoping report is required to be subjected to all I&APs for a period of at least 30 days for comment. Further to this, Regulation 40(2)(b) states that the public participation process must provide access to all information ...and must include consultation with every State department that administers a law relating to a matter affecting the environment</p>	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>Subject: RE: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP Dear Robyn</p> <p>Thank you for your email in response to that of Bathandwa's in the email trail. Apologies that the draft documents did not reach your desk, however these were submitted and made accessible to DARDLEA on 19th July (see email attached). Following your email on 3rd August 2024, we responded to you on 6th August (as per the email attached) and advised you that DARDLEA were in fact notified of the availability. Your email on 8th August refers: Good day Stephanie, "Be advised that the names of the officials at MTPA that you have highlighted in your below notification aren't the relevant officials that are required to be</p>

			<p>relevant to an application for an environmental authorisation.</p> <p>Regulation 21(1) is very clear in the requirement that a final Scoping Report must, within 44 days of submitting an application to the CA, be submitted to the CA (ie. DFFE), which report has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received. The arrangement below is not in line with this requirement, which amounts to an administrative flaw, and I fail to see how DFFE would be in a position to consider a final Scoping report that does not include the input from DARDLEA. The arrangement would also preclude the requirement for the applicant to incorporate the comments received from DARDLEA into the final Scoping report.</p> <p>As stated above, DARDLEA still awaits the documents for comment.</p> <p>Kind Regards Robyn</p>	<p>notified or the relevant officials that must review and comment on draft Scoping or EIA reports, or any reports related to an EIA process. There are also no officials in the list of officials in your screenshots that are in the Environmental Affairs Chief Directorate in MDARDLEA - as far as I am aware they are in the section that deals with Agriculture, which is an entirely different mandate.</p> <p>It would not be acceptable to not provide the commenting authority the mandatory 30 days to review and comment on draft reports, especially in light of the fact that there has been no prior notification. The Directorate Environmental Impact Management within DARDLEA represents the MEC as Competent Authority in Mpumalanga, and the commenting authority in respect of projects administered by DFFE. MTPA has the mandate for biodiversity matters on behalf of DARDLEA. As per my email to you below (3 August), hard copies of all reports must be submitted to Ms Mbuyane (Environmental Impact Management) at our Ermelo office, and the documents must be made available to me (and in this instance to Mr Cowden and Mr Lotter) electronically at the same time. You will need to contact Ms De Waal and Mr Krige at MTPA to confirm how documents must be submitted to MTPA. Please provide shape files of the 3 proposed WEFs as well."</p> <p>We then responded to you with the links to access the documents electronically and couriered hard copies to Ms Sindi Mbuyane as per your request on 3rd August - we will follow up with the courier if these haven't been received by her as yet. MTPA received their hard copies yesterday (refer to email attached from Celia de Waa for proof of receipt).</p> <p>Importantly, in your email of 3rd August, you state that "DARDLEA and MTPA have through internal arrangements with DFFE requested to be included in all pre-application consultations for Renewable</p>
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					<p>Energy projects in Mpumalanga, particularly wind energy facilities.” You also state in your email of 8th August (referenced in the para above) that “especially in light of the fact that there has been no prior notification”.</p> <p>I would like to point out that Ms Sindi Mbuyane was in fact involved in the pre-app meeting – please see attached the pre-app meeting minutes that Ms Sindi signed.</p> <p>Prior consultation therefore did happen and we kindly request that in light of this, you consider completing your review of the DSR to meet the public participation deadline of 22 August 2024.</p> <p>Should you be unable to provide your comments by this date, we would agree to the way forward stipulated in the email by Ms Bathandwa Ncube on 12 August 2024- ie. this would mean that the FSR would progress and get submitted without DARDLEA and MTPA comments if these are not available at the time, and for comments from these departments to be submitted as an addendum to the FSR.</p> <p>We thank you for your engagement to date and look forward to your response.</p>
22	Tebego Kgaphola Directorate: Biodiversity Mainstreaming and EIA	13 August 2024 Per email	Draft Scoping Phase	<p>From: [REDACTED] [REDACTED] [REDACTED] [REDACTED] ></p> <p>Subject: COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED MULILO AMSTERDAM WEFS CLUSTER, NEAR ERMELO, MPUMALANGA PROVINCE Good day</p>	<p>NOTE:</p> <p><i>Post concerns expressed from DARDLEA/MTPA. The previous draft applications were withdrawn and the entire process restarted to afford all IAPs 30 days commenting period.</i></p>

According to the minutes you provided, Ms. Mbuyane informed you on May 31, 2024, that "the MTPA is the main custodian of biodiversity in Mpumalanga and their guidelines would provide guidance on avoiding biodiversity sensitive areas." However, it appears this guidance was not sought.

Upon reviewing my email records, I found communications from Andrew Pearson, Annitta Attieh, and Verushka Snyders (all from Mulilo) regarding CBAs for other projects, indicating that Mulilo is aware that I am the appropriate contact for biodiversity planning related matters. I also have several emails to both Frans Krige and myself from ERM staff, such as Kate Hamilton from around 2016 and more recently. ERM should know who the correct staff would be to send the EIA documents to for comment.

We are currently managing several other development applications with similar deadlines. Given the short notice, it would be challenging to thoroughly review and apply our minds to the three applications before August 22nd.

It is regrettable that we were not consulted earlier, despite the prior recommendation to do so. This has now placed undue pressure on our team to meet your deadline.

Comments from authorities need to be considered and incorporated into the final EIA document. Including them as an appendix defeats the purpose of the legislated timeframes and the need to consider these inputs in the first place. This is a risk to your project.

				<p>We can only try and do our best.</p> <p>Regards, Mervyn</p>	
24	Masina Morudu DFFE	14 August 2024 Per email	Draft Scoping Phase	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>Subject: RE: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP Dear Stephanie,</p> <p>Following the discussion between the Provincial Department (DARDLEA) and the EAP earlier this morning, it was confirmed that the EAP did notify the province about the proposed wind energy developments but unfortunately the notification was sent to the Agriculture section within the department and the environmental section did not get the notification/draft reports. The Provincial Department was made aware of the public review of the draft scoping reports of the proposed developments by other interested and affected parties and Ms Luyt contacted ERM and requested the draft reports for comment on 03 August 2024 (see attached</p>	<p>From: [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>Subject: RE: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP Dear Masina</p> <p>Thank you for your emails. We will discuss with the proponent and get back to you.</p>

email). The EAP/Applicant failed to submit the requested reports until this week. The Provincial Department and MTPA must be afforded 30 days to comment as per EIA Regulations 2014 as amended otherwise the process will be viewed as being procedural flawed.

Considering the above, it is noted that the EAP will not be able to meet the regulated time frames for the submission of the final Scoping Reports (05 September 2024), and thus, the applications are going to regrettably lapse. Therefore the Department advises that the EAP withdraws the current applications and reapply. Please note that , reapplying constitutes the EIA process from the beginning.

Regards,

MASINA MORUDU



ERM

ERM HAS OVER 160 OFFICES ACROSS THE FOLLOWING
COUNTRIES AND TERRITORIES WORLDWIDE

Argentina	The Netherlands
Australia	New Zealand
Belgium	Peru
Brazil	Poland
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China	Puerto Rico
Colombia	Romania
France	Senegal
Germany	Singapore
Ghana	South Africa
Guyana	South Korea
Hong Kong	Spain
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