



Proposed Emvelo Wind Energy Facility and Auxiliary Infrastructure, Mpumalanga

Final Scoping Report for DFFE
Decision DFFE Decision

PREPARED FOR

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SIGNATURE PAGE

Proposed Emvelo Wind Energy Facility and Auxiliary Infrastructure, Mpumalanga

Final Scoping Report for DFFE Decision DFFE Decision

0684401



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PROJECT DETAILS

Project Details			
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Project title	Emvelo Wind Energy Facility and Auxiliary Infrastructure, near Ermelo, within the Msukaligwa Local Municipality, Mpumalanga Province		
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CHANGES MADE FROM DRAFT TO FINAL

Changes made from Draft to Final Scoping Report	Section (Volume I – Volume III)
Date changed from August 2024 to October 2024	Volume I – Volume III
Added new DFFE Reference where applicable	Volume I – Volume III
The word “draft” was changed to “final” throughout the document where applicable.	Volume I – Volume III
Typographical and grammatical errors were corrected, and minor clarifications were made throughout the document.	Volume I – Volume III
A table was included which reflects comments from DFFE and EAP responses.	Volume I: Section 2.3
Section 9: Public Participation was updated to reflect process completed to date and summary of issues raised.	Volume I: Section 9
A Public Participation Report has been included, which provides proof of all public participation undertaken during the scoping phase.	Volume III: Public Participation Report

CONTENTS

PROJECT DETAILS	4
CHANGES MADE FROM DRAFT TO FINAL	6
EXECUTIVE SUMMARY	I
SITE LOCATION AND PROPOSED DEVELOPMENT DESCRIPTION	I
ENVIRONMENTAL LEGISLATIVE REQUIREMENTS	I
AREAS OF INITIAL INVESTIGATION	III
NEED AND DESIRABILITY	III
ALTERNATIVES	IV
Environmental Impact Assessment Process	iv
DFFE: INFORMATION REQUIREMENTS FOR WEF APPLICATIONS	V
SPECIALIST INVESTIGATION	XI
SUMMARY OF FINDINGS	XI
1. INTRODUCTION	1
1.1 PROJECT OVERVIEW	1
1.2 PURPOSE AND AIM OF THE SCOPING REPORT	1
2. TERMS OF REFERENCE	3
2.1 STRUCTURE OF THE SCOPING REPORT	7
2.2 PROJECT TEAM DETAILS	8
2.3 DFFE COMMENTS ON THE DRAFT SCOPING REPORT	10
2.4 ASSUMPTIONS AND LIMITATIONS	21
3. ENVIRONMENTAL LEGAL FRAMEWORK	22
3.1 THE NATIONAL ENVIRONMENT MANAGEMENT ACT, 1998 (ACT NO 107 OF 1998)	22
3.2 ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REGULATIONS, 2014 AS AMENDED	22
3.3 THE NATIONAL HERITAGE RESOURCES ACT, 1999 (ACT NO 25 OF 1999 - NHRA)	27
3.4 NATIONAL DEPARTMENT OF AGRICULTURE, LAND REFORM AND RURAL DEVELOPMENT (DALRRD)	27
3.4.1 Subdivision of Agricultural Land Act, 1970 (Act No. 70 of 1970 - SALA)	28
3.5 CONSERVATION OF AGRICULTURAL RESOURCES, 1983 (ACT NO. 43 OF 1983)	28
3.6 NATIONAL VELD AND FOREST FIRE ACT, 1998 (ACT NO. 101 OF 1998)	28
3.7 THE ENVIRONMENT CONSERVATION ACT, 1989 (ACT NO.73 OF 1989), THE NATIONAL NOISE CONTROL REGULATIONS: GN R154 OF 1992	29
3.8 NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 2004 (ACT NO. 39 OF 2004)	29
3.8.2 National Dust Control Regulations, 2013	29

3.9	NATIONAL WATER ACT, 1998 (ACT NO. 36 OF 1998 - NWA)	30
3.9.1	Permit Requirements	31
3.10	NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT, 2004 (ACT NO. 10 OF 2004 - NEMBA)	31
3.10.1	Threatened or Protected Species List, 2015	31
3.10.2	Alien and Invasive Species Regulations, 2016	31
3.11	THE NATURE AND ENVIRONMENTAL CONSERVATION ORDINANCE NO. 19 OF 1974	31
3.12	NATIONAL FORESTS ACT, 1998 (ACT NO. 84 OF 1998 - NFA)	31
3.13	ASTRONOMY GEOGRAPHIC ADVANTAGE ACT, 2007 (ACT. 21 OF 2007)	32
3.14	NATIONAL ROAD TRAFFIC ACT, 1996 (ACT NO. 93 OF 1996) (NRTA)	32
3.15	CIVIL AVIATION ACT, 2009 (ACT NO. 13 OF 2009) (CAA)	32
3.16	PROMOTION OF ACCESS TO INFORMATION ACT, 2000 (ACT NO. 2 OF 2002) (PAIA)	33
3.17	NATIONAL ENVIRONMENTAL MANAGEMENT ACT: NATIONAL APPEALS REGULATIONS, 2014	33
3.18	ADDITIONAL RELEVANT LEGISLATION	33
3.19	CONVENTIONS AND TREATIES	34
3.19.1	The Paris Agreement (2016)	34
3.20	NATIONAL CLIMATE CHANGE RESPONSE WHITE PAPER (2011)	34
3.21	THE CONVENTION ON BIOLOGICAL DIVERSITY (CBD) (1993)	34
3.21.1	The Ramsar Convention (1971)	35
3.21.2	The Convention on the Conservation of Migratory Species of Wild Animals (CMS or Bonn Convention) (1983)	35
3.21.3	The Agreement on the Conservation of African-Eurasian Migratory Waterbirds (AEWA) (1999)	35
3.22	POLICIES AND GUIDELINES	35
3.22.1	Environmental Impact Assessment Guidelines	35
3.22.2	The Equator Principles (EPs) III, 2013	36
3.22.3	South African Wind Energy Facility Guidelines	36
3.22.4	International Finance Corporation (IFC) Performance Standards	37
4.	SCOPE OF WORK AND SCOPING METHODOLOGY PHASE	42
4.1	DFFE ENVIRONMENTAL SCREENING TOOL	42
4.2	SPECIALIST SCOPING METHODOLOGY	49
4.2.1	Soils and Agricultural Potential	49
4.2.2	Freshwater and Wetlands (Aquatics)	49
4.2.3	Terrestrial Biodiversity (Flora and Fauna)	50
4.2.4	Avifauna	51
4.2.5	Bats	53
4.2.6	Noise	54
4.2.7	Heritage, Archaeology and Palaeontology	54
4.2.8	Visual / Landscape	55
4.2.9	Socio-economics	55
4.2.10	Traffic and Transportation	56
5.	DESCRIPTION OF THE BASELINE ENVIRONMENT	57
5.1	REGIONAL AND LOCAL CONTEXT	57
5.2	TOPOGRAPHY AND TERRAIN	57
5.2.1	Landscape of the Project Area of Influence	57
5.3	CLIMATE CONDITIONS	58

5.4	GEOLOGY	59
5.5	SOILS AND AGRICULTURAL POTENTIAL	59
5.6	NOISE	59
5.7	FRESHWATER AND WETLANDS (AQUATICS)	60
5.8	TERRESTRIAL BIODIVERSITY (FLORA AND FAUNA)	69
5.8.1	Flora – Vegetation Types	69
5.8.2	Reptiles	71
5.8.3	Invertebrate SSC - Clonia lalandei (Saussure, 1888) Lalande's Black-winged Clonia	71
5.8.4	Amphibians	71
5.8.5	Alien Invasive Species	71
5.9	AVIFAUNA	73
5.9.1	Modified Environment	74
5.9.2	Important Bird Areas (IBAs)	74
5.9.3	National Protected Areas	76
5.9.4	Avifauna in the Broader Area	76
5.9.5	Results of Pre-Construction Bird Monitoring	89
5.9.6	Focal Points	92
5.9.7	Vantage Point Observations	95
5.9.8	Flight Risk Modelling	97
5.9.9	Spatial Distribution of Flights Over the Turbine Area	97
5.9.10	Additional Martial Eagle Monitoring	101
5.9.11	No-go Areas	101
5.10	BATS	104
5.11	SOCIO-ECONOMIC	108
5.11.1	Population	108
5.11.2	Households and house types	109
5.11.3	Household Income	109
5.11.4	Employment	110
5.11.5	Education	110
5.12	HERITAGE, ARCHAEOLOGY AND PALAEOLOGY	111
5.13	VISUAL / LANDSCAPE	111
5.14	TRAFFIC AND TRANSPORTATION	112
6.	ALTERNATIVES ASSESSMENT	114
6.1	THE NO DEVELOPMENT SCENARIO OR “NO-GO OPTION”	114
6.2	SITE SELECTION	115
6.3	DESIGN EVOLUTION ALTERNATIVES	116
6.4	TECHNOLOGY ALTERNATIVES	116
7.	DESCRIPTION OF PREFERRED ALTERNATIVE	118
7.1	WIND ENERGY FACILITY COMPONENTS	118
7.1.1	Wind Turbine Generators and Hardstand Areas	119
7.1.2	Electrical Cabling and On-site Substation	121
7.1.3	Battery Energy Storage System	121
7.1.4	Laydown Areas and Site Offices	123
7.1.5	Internal Site Access Roads	124
7.2	SERVICE PROVISION	124
7.2.1	Health and Safety	124
7.2.2	Water Requirements	124
7.2.3	Stormwater Management	125
7.2.4	Waste	125

7.2.5	Sewage	126
7.2.6	Electricity	126
7.3	EMPLOYMENT	126
7.4	SUMMARY OF PROJECT INFORMATION	126
8.	NEED AND DESIRABILITY	128
8.1	THE NEED & DESIRABILITY OF RENEWABLE ENERGY FACILITIES	128
8.1.1	Mitigating Climate Change	128
8.1.2	Diversification and Decentralisation of Supply	128
8.1.3	Economic Development and Job Creation	129
8.2	JUST ENERGY TRANSITION (JET)	131
8.3	POLICIES IN SUPPORT OF RENEWABLE ENERGY	132
8.4	NEED & DESIRABILITY GUIDELINE	133
9.	PUBLIC PARTICIPATION PROCESS	134
9.1	PRE-SCOPING PHASE PUBLIC PARTICIPATION PROCESS	134
9.2	SCOPING PHASE PPP	134
9.3	SUMMARY OF COMMENTS AND RESPONSES	135
9.4	EIA PHASE PPP	135
9.5	EA DECISION PHASE	136
10.	SCOPING PHASE ASSESSMENTS OF POTENTIAL IMPACTS	137
10.1	SOIL AND AGRICULTURAL POTENTIAL	137
10.2	NOISE	138
10.2.1	Construction Phase	139
10.2.2	Operational Phase	139
10.3	FRESHWATER AND WETLANDS (AQUATICS)	140
10.4	TERRESTRIAL BIODIVERSITY (FLORA AND FAUNA)	141
10.5	AVIFAUNA	141
10.5.1	Construction phase	142
10.5.2	Operational phase	142
10.5.3	Decommissioning phase	142
10.5.4	Cumulative Phase	142
10.6	BATS	143
10.6.1	Construction Phase	143
10.6.2	Operational Phase	143
10.6.3	Decommissioning Phase	144
10.7	SOCIO-ECONOMIC	144
10.7.1	Construction Phase	144
10.7.2	Operational Phase	146
10.7.3	Decommissioning Phase	147
10.7.4	Cumulative Phase	148
10.8	HERITAGE, ARCHAEOLOGY AND PALAEOLOGY	149
10.9	VISUAL/LANDSCAPE	150
10.9.1	Construction Phase	150
10.9.2	Operational Phase	151
10.9.3	Decommissioning Phase	151
10.9.4	Cumulative Impact Phase	151

10.10	TRAFFIC AND TRANSPORTATION	152
11.	SUMMARY OF PRELIMINARY FINDINGS AND CONCLUSION	153
11.1	SOIL AND AGRICULTURAL POTENTIAL	153
11.2	NOISE	154
11.3	FRESHWATER AND WETLANDS (AQUATICS)	154
11.4	TERRESTRIAL BIODIVERSITY AND PLANT	155
11.5	AVIFAUNA	158
11.5.1	<i>Wind Energy Facility</i>	158
11.6	BATS	159
11.7	SOCIO-ECONOMIC	160
11.8	HERITAGE, ARCHAEOLOGY AND PALAEOLOGY	160
11.9	VISUAL / LANDSCAPE AND FLICKER	160
11.10	TRAFFIC AND TRANSPORTATION	161
11.11	PRELIMINARY SITE SENSITIVITY EVALUATION	161
11.12	CONCLUSION	162
12.	PLAN OF STUDY FOR EIA	163
12.1	AIM OF THE EIA PHASE	163
12.2	CONSIDERATION OF ALTERNATIVES	163
12.3	AUTHORITY CONSULTATION	164
12.4	PUBLIC PARTICIPATION PROCESS	164
12.5	METHODOLOGY OF ASSESSMENT OF POTENTIAL IMPACTS	164
12.5.1	Prediction of Potential Impacts	165
12.6	SPECIALIST PLAN OF STUDY	169
12.6.1	Soil and Agricultural Potential	169
12.6.2	Freshwater and Wetlands (Aquatics)	170
12.6.3	Terrestrial Biodiversity (Flora and Fauna)	170
12.6.4	Avifauna	171
12.6.5	Bats	172
12.6.6	Visual / Landscape and Flicker	172
12.6.7	Heritage, Archaeology and Palaeontology	173
12.6.8	Noise	173
12.6.9	Socio-Economic	173
12.6.10	Traffic and Transportation	174

APPENDIX A EAP'S DECLARATION OF INTEREST AND CURRICULUM VITAE

APPENDIX B FIGURES (VOLUME I)

APPENDIX C SPECIALIST REPORTS (VOLUME II)

APPENDIX D PUBLIC PARTICIPATION REPORT (VOLUME III)

LIST OF TABLES

TABLE 0-1: APPLICABLE LISTED ACTIVITIES IN TERMS OF THE NEMA, AS AMENDED	II
TABLE 0-2: DETAILS OF THE AFFECTED FARM PROPERTIES AND SG 21 CODES	V
TABLE 0-3: GENERAL SITE INFORMATION	VII
TABLE 0-4: WEF TECHNICAL DETAILS	VII
TABLE 0-5: SITE MAPS AND GIS INFORMATION	VIII
TABLE 0-6: DEVELOPMENT AREA GEOGRAPHIC COORDINATES - EMVELO WEF	X
TABLE 2-1: LEGISLATIVE REQUIREMENTS FOR SCOPE OF ASSESSMENT AND CONTENT OF THE SCOPING REPORT	4
TABLE 2-2: STRUCTURE OF THIS SCOPING REPORT	7
TABLE 2-3: DETAILS OF THE APPLICANT	9
TABLE 2-4: DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER	9
TABLE 2-5: S&EIA PROJECT TEAM	9
TABLE 3-1: NEMA LISTED ACTIVITIES IN RELATION TO THE PROPOSED DEVELOPMENT	23
TABLE 3-2: DESCRIPTION OF THE IFC PERFORMANCE STANDARDS	38
TABLE 4-1: SPECIALIST ASSESSMENTS IDENTIFIED IN TERMS OF THE NATIONAL WEB-BASED SCREENING TOOL FOR THE PROPOSED EMVELO WEF	43
TABLE 5-1: CLIMATIC CONDITIONS OF THE PROPOSED SHEEPMOOR WEF	59
TABLE 5-2: FLORA INCLUDING SPECIES OF SPECIAL CONCERN (ENDANGERED SPECIES IN BOLD) FLAGGED FOR THE WEF SITE AND GRID CONNECTION ROUTE	69
TABLE 5-3: FAUNA SPECIES OF SPECIAL CONCERN	72
TABLE 5-4 BAT SPECIES POTENTIALLY OCCURRING WITHIN THE SHEEPMORE WEF POAI	104
TABLE 8-1: REIPPPP WEIGHTING	129
TABLE 10-1: LOCATION AND DESCRIPTION OF RECORDED SITES	149

LIST OF FIGURES

FIGURE 1-1: LOCALITY MAP	1
FIGURE 1-2: PRELIMINARY SITE LAYOUT PLAN	2
FIGURE 4-1: PROJECT LOCATION WITHIN BROADER AREA OF 12 SABAP2 PENTADS	53
FIGURE 5-1: LOCATION OF THE PROPOSED EMVELO WEF (PINK POLYGON)	
FIGURE 5-2 PROJECT LOCALITY MAP INDICATING THE VARIOUS QUATERNARY CATCHMENT BOUNDARIES (ORANGE DOTTED LINES) IN RELATION TO THE STUDY AREA (SOURCE DWS AND NGI).	64
FIGURE 5-3 VARIOUS WATERBODIES IDENTIFIED IN THE NATIONAL WETLAND INVENTORY V5.2 (2020)	65
FIGURE 5-4 THE RESPECTIVE SUBQUATERNARY CATCHMENTS RATED IN TERMS OF FRESHWATER ECOSYSTEM PRIORITY AREAS (FEPAS) AND STRATEGIC WATER RESOURCE AREAS IN RELATION TO THE STUDY AREA	66
FIGURE 5-5 A VIEW OF A MAINSTEM WATERCOURSE (TRIBUTARY OF THE MPAMA RIVER), WITH TRANSFORMED FLOODPLAIN	67
FIGURE 5-6 A VIEW OF CHANNELLED VALLEY BOTTOM WETLAND WITHIN A TRANSFORMED CATCHMENT (CROP PRODUCTION & GRAZING)	67
FIGURE 5-7 ONE OF THE SMALLER ENDORHEIC PANS THAT IS LOCATED NEAR THE OHL BETWEEN THE WEF AND ERMELO	68
FIGURE 5-8 SEEPAGE WETLAND IN THE HEADWATER AREAS OF THE VAAL RIVER / USUTU RIVER CATCHMENT DIVIDE	68
FIGURE 5-9: IMPORTANT BIRD AREAS IN THE VICINITY OF THE PROPOSED PROJECT.	76
FIGURE 5-10: INDEX OF KILOMETRIC ABUNDANCE OF PRIORITY SPECIES RECORDED AT THE WEF AND CONTROL SITE DURING DRIVE TRANSECT SURVEYS (SEVEN SURVEYS).	91
FIGURE 5-11: INDEX OF KILOMETRIC ABUNDANCE OF PRIORITY SPECIES RECORDED AT THE WEF DURING WALK TRANSECT SURVEYS (SEVEN SURVEYS).	91
FIGURE 5-12: THE LOCATION OF PRIORITY SPECIES RECORDED AT THE PROPOSED EMVELO WEF THROUGH TRANSECT COUNTS AND INCIDENTAL SIGHTINGS	92
FIGURE 5-13: RECORDED FLIGHT TIMES (IN HOURS: MINUTES: SECONDS) AND FLIGHT ALTITUDES OF PRIORITY SPECIES (DURING THE FIRST SEVEN SURVEYS, EXCLUDING THE	

ADDITIONAL FIVE SURVEYS CONDUCTED AS PART OF THE MARTIAL EAGLE MONITORING)	96
FIGURE 5-15: RECORDED FLIGHT LINES OF PRIORITY SPECIES IN AND NEAR THE EMVELO WEF PROJECT SITE (SEVEN SURVEYS).	98
FIGURE 5-16: RECORDED FLIGHT LINES FOR MARTIAL EAGLE IN AND NEAR THE EMVELO WEF PROJECT SITE (ADDITIONAL FIVE SURVEYS).	99
FIGURE 5-17: RECORDED FLIGHT LINES OF ALL OTHER PRIORITY SPECIES (EXCLUDING MARTIAL EAGLE) IN AND NEAR THE EMVELO WEF PROJECT SITE (ADDITIONAL FIVE SURVEYS)	100
FIGURE 5-18: RECORDED FLIGHT TIMES (IN HOURS: MINUTES: SECONDS) AND FLIGHT ALTITUDES OF PRIORITY SPECIES.	103
FIGURE 7-1: SIMPLE ILLUSTRATION OF A TYPICAL WIND ENERGY FACILITY OPERATING SEQUENCE	119
FIGURE 7-2: AN ILLUSTRATION OF TYPICAL COMPONENTS OF A WIND TURBINE GENERATOR (WTG)	120
FIGURE 7-3: THE INSIDE OPERATION OF A TYPICAL WIND TURBINE	120
FIGURE 7-4: ILLUSTRATION OF A TYPICAL TURBINE HARDSTAND AND LAYDOWN AREA	121
FIGURE 7-5: TYPICAL REPRESENTATION OF HOW BATTERIES AND BATTERY MODULES ARE HOUSED AND ASSEMBLED	122
FIGURE 7-6: SOLARCITY'S TESLA BATTERY STORAGE FACILITY, HAWAII.	123
FIGURE 7-7: A STOCK IMAGE OF A SIMILAR DEVELOPMENT WITH AN ON-SITE SUBSTATION AND BESS	123

ACRONYMS AND ABBREVIATIONS

Acronyms	Description
BAR	Basic Assessment Report
BESS	Battery Energy Storage System
BSA	Blade Swept Area
CA	Competent Authority
CARA	Conservation of Agricultural Resources, 1983 (Act No. 43 of 1983)
CBA	Critical Biodiversity Area
DRDLEA	Department of Agriculture, Rural Development, Land and Environmental Affairs
dB	Decibel
DFFE	Department of Forestry, Fisheries and the Environment (National)
DMRE	Department of Mineral Resources and Energy
DoE	Department of Energy
DHSWS	Department of Human Settlement, Water and Sanitation
EAP	Environmental Assessment Practitioner
ECA	Environment Conservation Act, 1989 No. 73 of 1989)
EGI	Electricity Grid Infrastructure
EIA	Environmental Impact Assessment

EMPr	Environmental Management Programme
ESA	Ecological Support Area
ESA	Early Stone Age
ESKOM	Eskom Holdings SOC Limited
EWT	Endangered Wildlife Trust
FEPA	Freshwater Ecosystems Priority Areas
GNR	Government Notice Regulation
GSDM	Gert Sibande District Municipality
HD	Historically Disadvantaged
HIA	Heritage Impact Assessment
HV	High Voltage
I&AP	Interested and Affected Party
IBA	Important Bird Area
IDP	Integrated Development Plan
IEM	Integrated Environmental Management
IPP	Independent Power Producer
IRP	Integrated Resource Plan
IUCN	International Union for Conservation of Nature
kV	Kilovolt
kWh	Kilowatt Hours
LSA	Late Stone Age
MBSP	Mpumalanga Biodiversity Sector Plan
MSA	Middle Stone Age
MW	Megawatt
NBA	National Biodiversity Assessment
NCR	Noise Control Regulations
NDP	National Development Plan
NEMA	National Environmental Management Act, 1998 (Act No. 107 of 1998)
NEMBA	National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)
NFEPA	National Freshwater Ecosystem Priority Area
NHRA	National Heritage Resources Act, 1999 (Act No. 25 of 1999)
NPAES	National Protected Area Expansion Strategy
NSD	Noise-sensitive Development
NSR	Noise Sensitive Receptors
NWA	National Water Act, 1998 (Act No. 36 of 1998)
OES	Ostrich Eggshell

ONA	Other Natural Areas
PAOI	Project Area of Influence
PES	Present Ecological State
PGDS	Provincial Growth and Development Strategy
PPA	Power Purchase Agreement
PPP	Public Participation Process
PSEIA	Plan of Study for the Environmental Impact Assessment
REIPPPP	Renewable Energy Independent Power Producer Procurement Programme
RMPPP	Risk Mitigation Power Procurement Programme
SAHRA	South African Heritage Resources Agency
SANBI	South African National Biodiversity Institute
SANRAL	South African National Roads Agency Limited
SANS	South African National Standards
SAWS	South African Weather Service
SCADA	Supervisory Control and Data Acquisition
SCC	Species of Conservation Concern
SDF	Spatial Development Framework
SEA	Strategic Environmental Assessment
SIA	Social Impact Assessment
SR	Scoping Report
SPL	Sound Pressure Level
SPV	Special Purpose Vehicle
SSV	Site Sensitivity Verification
VIA	Visual Impact Assessment
WEF	Wind Energy Facility
WULA	Water Use License Application

EXECUTIVE SUMMARY

Emvelo Wind Energy Facility (Pty) Ltd ('the Project Applicant') is applying for EA to construct and operate the up to 260 MW Emvelo Wind Energy Facility (WEF) (the proposed Emvelo WEF) and its associated 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 30 km (300 m corridor), traversing 18 land parcels, to be constructed to connect the proposed WEF to the Eskom Uitkoms Substation (Figure 1-1). Environmental Resources Management Southern Africa (Pty) Ltd ('ERM') has been appointed to act as the independent Environmental Assessment Practitioner (EAP) to undertake the Scoping and Environmental Impact Assessment (S&EIA) process for Environmental Authorisation under Chapter 5 of the National Environmental Management Act, 1998 (Act 107 of 1998 - NEMA) as amended, for the Proposed Development.

SITE LOCATION AND PROPOSED DEVELOPMENT DESCRIPTION

The proposed Emvelo WEF is located approximately 30 km east of the town of Ermelo within the Msukaligwa Local Municipality, and Gert Sibande District Municipality, Mpumalanga Province.

The proposed Emvelo WEF will consist of the components listed below. It is important to note at the outset that the exact specifications of the project components will be determined during the detailed engineering design phase prior to construction (subsequent to the issuing of an EA, should such an authorisation be granted), but that the information provided below is seen as the worst-case scenario.

- Up to 40 wind turbines, with a maximum hub height of up to 150 m and a rotor diameter of up to 220 m;
- Temporary laydown areas which will accommodate the crane platforms and hardstand laydown area;
-
- Cabling between the turbines, to be laid underground where practical and feasible;
- One on-site substation with capacity of up to 132 kV to facilitate the connection between the WEF and the electricity grid;
- 132 kV over-head powerline of approximately 30 km (300 m corridor);
- Internal roads (existing roads will be upgraded wherever possible);
- A temporary site camp establishment and concrete batching;
- Operation and Maintenance (O&M) buildings; and
- Total permanent development footprint of up to 180 ha after rehabilitation.

The project is expected to have a 30-year life span, but with possible refurbishment this could be extended if deemed feasible at the time.

ENVIRONMENTAL LEGISLATIVE REQUIREMENTS

The EIA Regulations, 2014, published in Government Notice (GN) No. R. 982 as amended provide for the control of certain Listed Activities. These activities are listed in GN No. R. 983 (Listing Notice 1 - Basic Assessment), R. 984 (Listing Notice 2 - Scoping & EIA Process) and R. 985

(Listing Notice 3 - Basic Assessment) of 4 December and are prohibited to proceed until environmental authorisation has been obtained from the competent authority, in this case, the Department of Forestry, Fisheries and the Environment (DFFE).

On 7 April 2017 in Government Gazette 40772 the Minister of Environmental Affairs published amendments in Government Notice (GN) Number R. 326 to the Environmental Impact Assessment (EIA) Regulations of 2014 that provide for the control of certain Listed Activities. These activities are listed in Listing Notice 1 (GN R327), Listing Notice 2 (GN R325) and Listing Notice 3 (GN R324). Activities triggered within Listing Notice 1 and 3 require Basic Assessment; activities within Listing Notice 2 require a Scoping & EIA Process.

As the proposed Emvelo WEF and associated infrastructure triggers activities in Listing Notices 1 - 3 and does not fall within a Renewable Energy Development Zone (REDZ), a full Scoping and EIA (S&EIA) process will be followed.

Listed Activities applicable to the proposed Emvelo WEF and associated infrastructure are presented in Table 0-1 below. All potential impacts associated with these Listed Activities will be considered and assessed in this S&EIA process.

TABLE 0-1: APPLICABLE LISTED ACTIVITIES IN TERMS OF THE NEMA, AS AMENDED

Listing Notice	Activities
LN 1 GN R327 ¹	11(i); 12 (ii, a, c); 14; 19; 24 (ii); 27 (i)(ii), 28 (ii); 48 (i)(a, c); and 56 (ii).
LN 2 GN R325 ²	1; and 15.
LN 3 GN R324 ³	4 (f)(i)(bb)(ee); 10(f,i)(bb)(ee); 12(f)(ii); 14(ii)(f)(i)(bb)(ff); 18(f)(i) (bb)(ee); 23 (ii, a, c)(f)(i)(bb)(ee)

Depending on the final design of the Emvelo WEF and associated infrastructure (to be determined during the EIA phase of the project), there may be a requirement for the following additional permits / authorisations:

- Biodiversity Permits in terms of the National Environmental Management: Biodiversity Act (Act No 10 of 2004) (NEMBA);
- Waste Management License/s as required by the NEMA, Waste Act, 2008 (Act No. 59 of 2008);
- Obstacle Permits as required by the Civil Aviation Act (Act 13 of 2009);
- Water Use Licenses as required by the National Water Act, 1998 (Act No. 36 of 1998) (NWA); and
- Heritage License in term of the National Heritage Resources Act 25 of 1999.

These permits will be applied for should the project be authorised and be selected as a preferred bidder.

1 "Listing Notice 1 of the EIA Regulations, promulgated under Government Notice R983 of 4 December 2014, as amended by Government Notice R327 of 7 April 2017."

2 "Listing Notice 2 of the EIA Regulations, promulgated under Government Notice R984 of 4 December 2014, as amended by Government Notice R325 of 7 April 2017."

3 "Listing Notice 3 of the EIA Regulations, promulgated under Government Notice R985 of 4 December 2014, as amended by Government Notice R324 of 7 April 2017."

AREAS OF INITIAL INVESTIGATION

A number of initial specialist investigations were completed for this Final Scoping Report (FSR) and their findings are included in this document.

Each of the specialist assessments followed a systematic approach to the identification and assessment of impacts, with the principal steps being:

- Description of existing environment/baseline conditions;
- Prediction of likely potential impacts, including cumulative impacts (both positive and negative);
- Assessment of likely potential impacts (positive and negative);
- Identification of appropriate mitigation measures; and
- Assessment of residual (potential) environmental impacts.

The individual assessment methodologies and baseline descriptions are set out in this report. The approaches are in line with the legal requirements and industry best practice (IBP) guidelines and makes use of the experience and expertise of the EAP and the specialists.

NEED AND DESIRABILITY

Spatial framework and strategic planning / policy documents that are the most relevant on a national, provincial, metropolitan and local level were reviewed as part of this study. Planning policies are discussed in Section 2 of the Final Scoping Report (FSR) (this report – Volume I) and in detail in the Specialist Scoping Reports (Volume II).

It is established that policy supports the development of renewable energy at all levels of governance. The intent of local, provincial and national policies is to address energy supply issues and aim to promote economic growth in South Africa.

The EIA Regulations, 2014, as amended, state that the objective of the scoping process includes to, through a consultative process, motivate the need and desirability of the proposed activity, including the need and desirability of the activity in the context of the preferred location.

The Guideline for Need and Desirability released by the DFFE in 2017 was used to assess the need and desirability of the proposed Emvelo WEF. According to the DFFE guideline⁴: *“Need and desirability is based on the principle of sustainability, set out in the Constitution and in NEMA, and provided for in various policies and plans, including the National Development Plan 2030 (NDP). Addressing the need and desirability of a development is a way of ensuring sustainable development – in other words, that a development is ecologically sustainable and socially and economically justifiable – and ensuring the simultaneous achievement of the triple bottom-line.”*

Section 8 of this report describes need and desirability for this development and provides an explanation as to why wind energy can be considered as an alternative to meeting the need for increased electricity demand over other sources of generation such as fossil fuels. Summarily, these reasons include:

- Positive impact on climate change;
- Overcoming the country’s energy constraints;

⁴https://www.dffe.gov.za/sites/default/files/legislations/needanddesirabilityguideline2017_0.pdf

- Diversification and decentralisation of supply;
- Reduced costs of energy; and
- Positive economic development including job creation.

It is the intention of the Project Developer to bid the Emvelo WEF in upcoming bidding windows of the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP) with the aim of evacuating the generated power from the WEF into the National Eskom Grid. This will aid in the diversification and stabilisation of the country's electricity supply in line with the objectives of the Integrated Resource Plan (IRP).

ALTERNATIVES

The Applicant identified the Emvelo WEF after conducting a series of pre-feasibility assessments by considering aspects such as potential wind speed, proximity to the grid connection point, available land, site access and suitable topography. The proposed developable area (the proposed development site) was refined based on these initial feasibility assessments and taking into consideration preconstruction avifaunal and bat monitoring results. The various alternatives considered as part of this Project are detailed in Section 6 of this report.

ENVIRONMENTAL IMPACT ASSESSMENT PROCESS

The EIA process is a decision-making tool with the specific aim of selecting an option that will provide an appropriate balance between the benefits of a proposed development and the potential adverse environmental impacts. The EIA process is designed to identify activities which may have a detrimental effect on the environment, and proposed mitigation measures to minimise or eliminate these potential impacts. Should this balance be achieved, the competent authority will issue an environmental authorisation, with conditions, for the development to proceed. It must be noted that the DFFE have granted permission for the inclusion of the electrical infrastructure into a single application with the Wind Energy Facility, but two Environmental Authorisations (one for the WEF and one for the electrical infrastructure) will be issued if the application is successful.

SCOPING PHASE

The first phase of the EIA process is Scoping. The purpose of the scoping phase is to, through consultation with Interested and Affected Parties (I&APs), determine the extent of the impact assessment, including the potential impacts and issues that must be assessed during the EIA phase. The scoping phase also assesses each alternative (design, technology, location, etc.) of the development, against these potential impacts, to determine the best environmental option for the site to be further assessed during the EIA phase. The scoping phase also determines the methodology and terms of reference for specialist's studies to be undertaken for the proposed development. **Any layout presented in this report is preliminary and subject to change following consideration of I&AP input and further specialist assessment in the EIA phase.**

This Scoping Report describes the proposed development and includes an assessment of its alternatives. The report documents legal, planning and policy context for the proposed development as a renewable energy development. The baseline environment is described, and potential impacts are predicted. It documents the Scoping Phase Public Participation Process

(PPP), noting key stakeholders and it describes the EIA Phase assessment methodologies in the Plan of Study for EIA (PSEIA).

Environmental surveys, on site and desktop-based assessments were initiated and where possible, this survey information was included in the DSR. The DSR was made available for public comment for the prescribed statutory consultation period of 30 days (22 August – 21 September 2024). All comments received have been tabled and responded to in a Comments and Responses Reports (Volume III) which have been addressed and submitted with the Final Scoping Report (FSR) and PSEIA to the DFFE, as the competent authority (CA) for approval to mark the end of the Scoping phase.

EIA PHASE

Once the FSR is accepted by the DFFE, the Environmental Assessment Practitioner (EAP) will compile the Draft EIA Report (DEIAR) and Draft Environmental Management Programme (EMPr) which will be made available for public comment for a further period of 30 days. All comments will be considered and incorporated into the Final EIA Report (FEIAR).

The report will document the assessment of all potential impacts of the proposed development on the existing baseline environment. This will include an assessment of cumulative impacts between the proposed development, and other developments in the area.

Once the FEIAR has been submitted to the DFFE, the DFFE will then issue a decision on whether to grant or refuse Environmental Authorisation.

DFFE: INFORMATION REQUIREMENTS FOR WEF APPLICATIONS

The DFFE’s requirements for information for all applications for WEFs are included in this section of the report. Where this information is not provided in the tables below, the location of where it can be found in the report is indicated. Should the information not be available at this stage of the environmental authorisation process (Scoping phase), it is specified that it shall be documented during the EIA phase.

TABLE 0-2: DETAILS OF THE AFFECTED FARM PROPERTIES AND SG 21 CODES FOR EMVELO FARM

Farm Name	Farm No.	Portion No.	SG Code
Emvelo WEF			
Schiedam	274	RE	T0IT0000000027400000
Schiedam	274	2	T0IT0000000027400002
Schiedam	274	1	T0IT0000000027400001
Schiedam	274	6	T0IT0000000027400006
Schiedam	274	5	T0IT0000000027400005
Vaalbank	285	1	T0IT0000000028500001
Vaalbank	285	5	T0IT0000000028500005

Farm Name	Farm No.	Portion No.	SG Code
Waihoek	286	9	T0IT000000002860009
Waihoek	286	2	T0IT000000002860002
Waihoek	286	6	T0IT000000002860006
Waihoek	286	13	T0IT000000002860013
Waihoek	286	7	T0IT000000002860007
Waihoek	286	10	T0IT000000002860010
Waihoek	286	5	T0IT000000002860005
Waihoek	286	14	T0IT000000002860014
Waihoek	286	3	T0IT000000002860003
Waihoek	286	12	T0IT000000002860012
Klipfontein	283	RE	T0IT000000002830000
Bosjesspruit	291	7	T0IT000000002910007

Emvelo WEF Grid Connection

Schiedam	274	2	T0IT000000002740002
Onverwacht	273	1	T0IT000000002730001
Onverwacht	273	7	T0IT000000002730007
Onverwacht	273	8	T0IT000000002730008
Onverwacht	287	3	T0IT000000002870003
Zwartwater	288	9	T0IT000000002880009
Zwartwater	288	10	T0IT000000002880010
Zwartwater	288	2	T0IT000000002880002
Zwartwater	288	1	T0IT000000002880001
Weltevreden	289	10	T0IT000000002890010
Weltevreden	289	11	T0IT000000002890011
Weltevreden	289	6	T0IT000000002890006
Weltevreden	289	RE/3	T0IT000000002890003
Witpunt	267	RE/7	T0IT000000002670007

Farm Name	Farm No.	Portion No.	SG Code
Mooiplaats	290	7	TOIT00000000029000007
Mooiplaats	290	8	TOIT00000000029000008
Witpunt	267	29	TOIT00000000026700029
Camden Power Station	329	RE	TOIT00000000032900000

TABLE 0-3: GENERAL SITE INFORMATION

General Site Components	Description/Dimensions
Copies of deeds of all affected farm portions	Submitted with the Application Form to the DFFE.
Location of the site	Approximately 30 km east of Ermelo within the Msukaligwa Local Municipality, and Gert Sibande District Municipality.
Facility Area	Approximately 180 hectares. This is the permanent development footprint
Photos of areas that give a visual perspective of all parts of the site	Included in the Visual Scoping Report, section 6 (refer to Volume II)
Photographs from sensitive visual receptors (tourism routes, tourism facilities, etc.)	Included in the Visual Scoping Report, section 6 (refer to Volume II)

TABLE 0-4: WEF TECHNICAL DETAILS

Developer / Applicant	Emvelo WEF
DFFE Reference	14/12/16/3/3/2/2611
Site Access	Locality to be confirmed. Total width up to 15 m (12 m after rehabilitation) consisting of up to 3 m width for underground 33 kV reticulation.
WEF Maximum Capacity	Up to 260 MW
Number of Turbines	Up to 40
Hub Height from ground level	Up to 150 m
Blade Length	Up to 110 m
Rotor Diameter	Up to 220 m
Length of internal roads	Unknown at this point (to be included in EIA Phase).
Width of internal roads	Up to 12 m to be rehabilitated to up to 9 m.
On-site substation capacity	Up to 132 kV

Developer / Applicant		Emvelo WEF
Proximity to grid connection		Approximately 30 km
Grid Connection Capacity		Up to 132 kV
Area occupied by both permanent and construction laydown areas	Temporary turbine construction laydown and storage areas.	Crane platforms and hardstand laydown area up to 40Ha
	Construction laydown/staging area which will also accommodate the O&M buildings	Will be located within the permanent footprint area.
	Permanent footprint area dimensions, including roads, turbine hardstand areas, O&M buildings and battery pad.	O&M: Up to 1 ha Hardstand areas: Up to 1 ha Total area of final footprint (including roads): up to 180 ha
Operations and maintenance buildings (O&M building) with parking area		Up to 1 ha
Height of fencing		2.8 m
Type of fencing		Where site offices are required, temporary screen fencing used to screen offices from the wider landscape.

TABLE 0-5: SITE MAPS AND GIS INFORMATION

Site Maps and GIS Information	Section of this Report
All maps/information layers are provided in ESRI Shapefile format.	
All affected farm portions must be indicated.	Figure 1-1: Site Locality Map
The exact site of the application must be indicated (the areas that will be occupied by the application).	Figure 1-1: Site Locality Map
A <i>status quo</i> map/layer must be provided that includes the following: Current use of land on the site including:	
Buildings and other structures	To be produced during EIA phase
Agricultural fields	To be produced during EIA phase
Grazing areas	To be produced during EIA phase
Natural vegetation areas (natural veld not cultivated for the preceding 10 years) with an indication of the vegetation quality as well as fine scale mapping in respect of Critical Biodiversity Areas and Ecological Support Areas	Terrestrial Studies in Volume II Specialist Scoping Reports Figure 14 and 15: Preliminary Environmental Constraints Map

Site Maps and GIS Information	Section of this Report
Critically endangered and endangered vegetation areas that occur on the site	Appendix B- Scoping figures: Emvelo WEF Critical Biodiversity Area
Bare areas which may be susceptible to soil erosion	Section 5.5; Section 10.1
Cultural historical sites and elements	Section 5.12
Rivers, streams and water courses	Section 5.7
Ridgelines and 20 m continuous contours with height references in the GIS database	To be produced during EIA phase
Fountains, boreholes, dams (in-stream as well as off-stream) and reservoirs	To be produced during EIA phase
High potential agricultural areas as defined by the Department of Agriculture, Forestry and Fisheries	Screening Tool Report in Volume II
Buffer zones (also where it is dictated by elements outside the site): 500 m from any irrigated agricultural land 1 km from residential areas	To be produced during EIA phase
Indicate isolated residential, tourism facilities on or within 1 km of the site	To be produced during EIA phase
A slope analysis map/layer that include the following slope ranges: Less than 8% slope (preferred areas for turbines and infrastructure) Between 8% and 12% slope (potentially sensitive to turbines and infrastructure) Between 12% and 14% slope (highly sensitive to turbines and infrastructure) Steeper than 18% slope (unsuitable for turbines and infrastructure)	To be produced during EIA phase
A map/layer that indicate locations of birds and bats including roosting and foraging areas	Birds and Bat Studies: Volume II: Specialist Scoping Reports
A site development proposal map(s)/layer(s) that indicate: Turbine positions Foundation footprint Permanent laydown area footprint Construction period laydown footprint Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting on sections possible).	Figure 1-2: Preliminary Site Layout
River, stream and water crossing of roads and cables indicating the type of bridging structures that will be used.	To be produced during EIA phase
Substation(s) and/or transformer(s) sites including their entire footprint.	Figure 1-2 Preliminary Site Layout
Cable routes and trench dimensions (where they are not along internal roads) Connection routes to the distribution/transmission network (the connection must form part of the EIA even if the construction and	To be produced during EIA phase

Site Maps and GIS Information	Section of this Report
maintenance thereof will be done by another entity such as Eskom).	
Cut and fill areas at turbine sites along roads and at substation/transformer sites indicating the expected volume of each cut and fill	To be produced during EIA phase
Borrow pits	To be produced during EIA phase
Spoil heaps (temporary for topsoil and subsoil and permanently for excess material) Buildings including accommodation	To be produced during EIA phase

TABLE 0-6: DEVELOPMENT AREA GEOGRAPHIC COORDINATES - EMVELO WEF

Proposed Emvelo WEF Site Boundary and Associated Infrastructure		
Aspect	Latitude	Longitude
Northeast Corner	26°34'18.88"S	30°20'21.50"E
West Corner	26°38'41.64"S	30°16'16.34"E
Southwest Corner	26°41'44.00"S	30°16'19.94"E
Southeast Corner	26°40'19.58"S	30°20'31.71"E
Facility Substation (Preferred)		
Centre Point	26°36'19.80"S	30°21'8.79"E
Laydown Area (Preferred)		
Centre Point	26°36'34.94"S	30°21'24.78"E
Laydown Area (Alternative 1)		
Centre Point	26°34'40.63"S	30°20'11.60"E
O&M Buildings (Preferred)		
Centre Point	26°36'21.70"S	30°21'14.71"E
30 km Overhead Line (Preferred)		
Start	26°36'21.65"S	30°21'5.30"E
End	26°37'5.96"S	30° 5'51.78"E
30 km Overhead Line (Alternative 1)		

Start	26°36'21.65"S	30°21'5.30"E
End	26°38'43.89"S	30° 4'10.58"E

30 km Overhead Line (Alternative 2)

Start	26°36'21.65"S	30°21'5.30"E
End	26°38'43.89"S	30° 4'10.58"E

30 km Overhead Line (Alternative 3)

Start	26°36'21.65"S	30°21'5.30"E
End	26°37'0.67"S	30° 5'52.52"E

Please refer to Figure 1-1 and Figure 1-2 for the proposed location and the preliminary site development plan, respectively.

SPECIALIST INVESTIGATION

Studies including soil, land and agricultural potential, aquatic / freshwater, terrestrial ecology (flora and fauna), avifauna, bats, visual / landscape, heritage and archaeology, paleontology, noise, socio-economic and traffic and transportation have been completed and / or is underway to quantify possible impacts and magnitude of impacts.

SUMMARY OF FINDINGS

The FSR has captured the key and/or scoped issues and impacts for this proposed development by taking into account the findings of the specialists’ scoping reports. The specialist reports document anticipated environmental impacts that may be experienced within both the biophysical and social environments.

It is the opinion of the EAP based on the assessments undertaken thus far that the application can proceed to the EIA phase and the scoping report can be accepted by the DFFE.

1. INTRODUCTION

1.1 PROJECT OVERVIEW

Emvelo Wind Energy Facility (Pty) Ltd ('the Project Applicant') is applying for EA to construct and operate the up to 200 MW Emvelo Wind Energy Facility (WEF) (the proposed Emvelo WEF) and its associated 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 30 km (300 m corridor), traversing 18 land parcels, to be constructed to connect the proposed WEF to the Eskom Uitkoms Substation (Figure 1-1).

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

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 EA; in line with Chapter 5 of the National Environmental Management Act, 1998 (Act 107 of 1998 – NEMA), and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended). It must be noted that the DFFE have granted permission for the inclusion of the electrical infrastructure into a single application with the Wind Energy Facility, but two Environmental Authorisations (one for the WEF and one for the electrical infrastructure) will be issued if the application is successful.

1.2 PURPOSE AND AIM OF THE SCOPING REPORT

This FSR aims to present and assess the baseline environment as well as the initial proposed site development plan. While a **preliminary** turbine layout has been provided in Figure 1-2 below, the precise location of each wind turbine, and associated infrastructure has not been finalised and will be determined by the findings of the various specialist's assessments as well as other technical and financial constraints for this proposed development site. The site development plan will continue to be refined through an iterative process taking into considering specialists' findings.

FIGURE 1-1: LOCALITY MAP

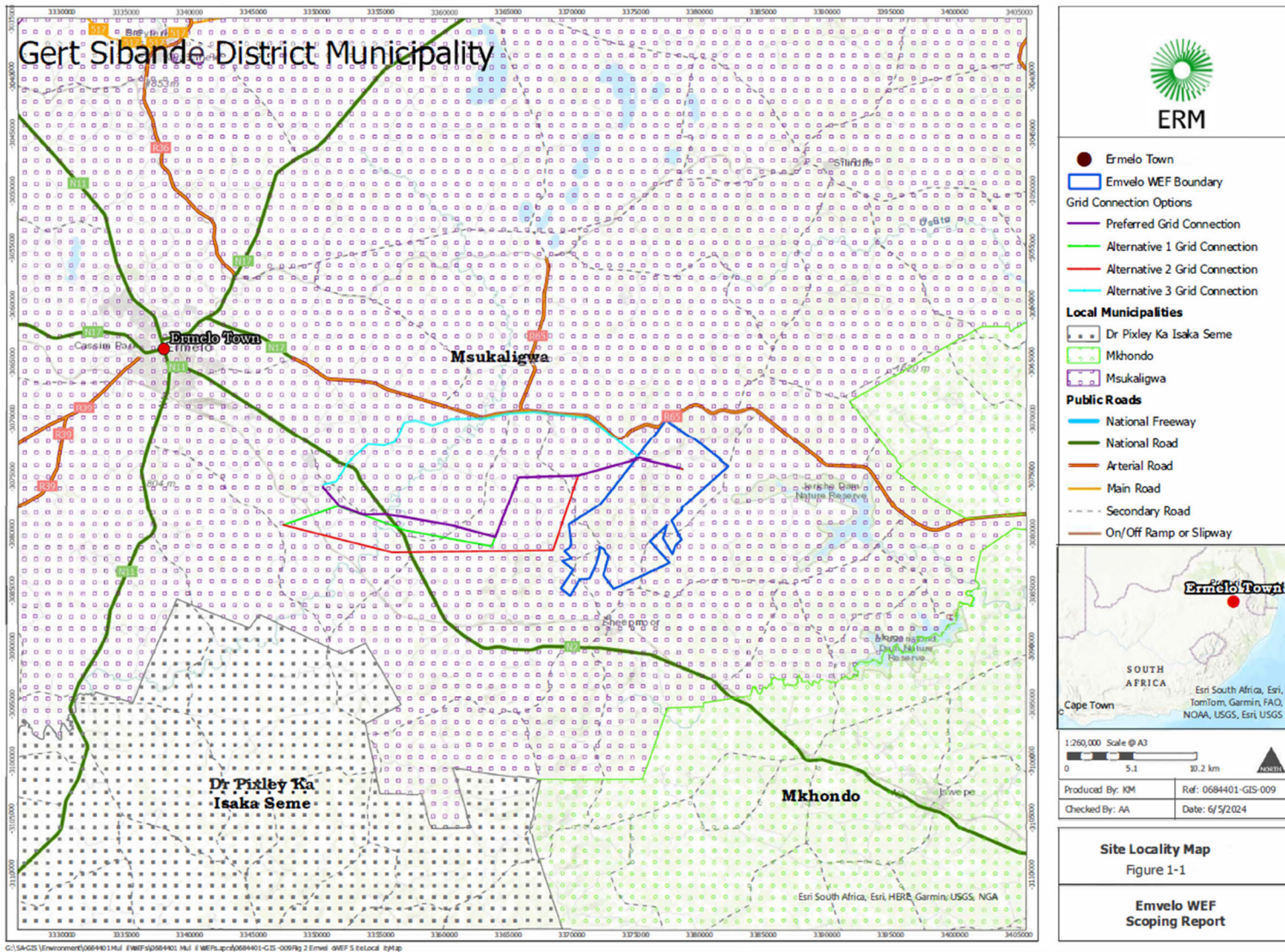
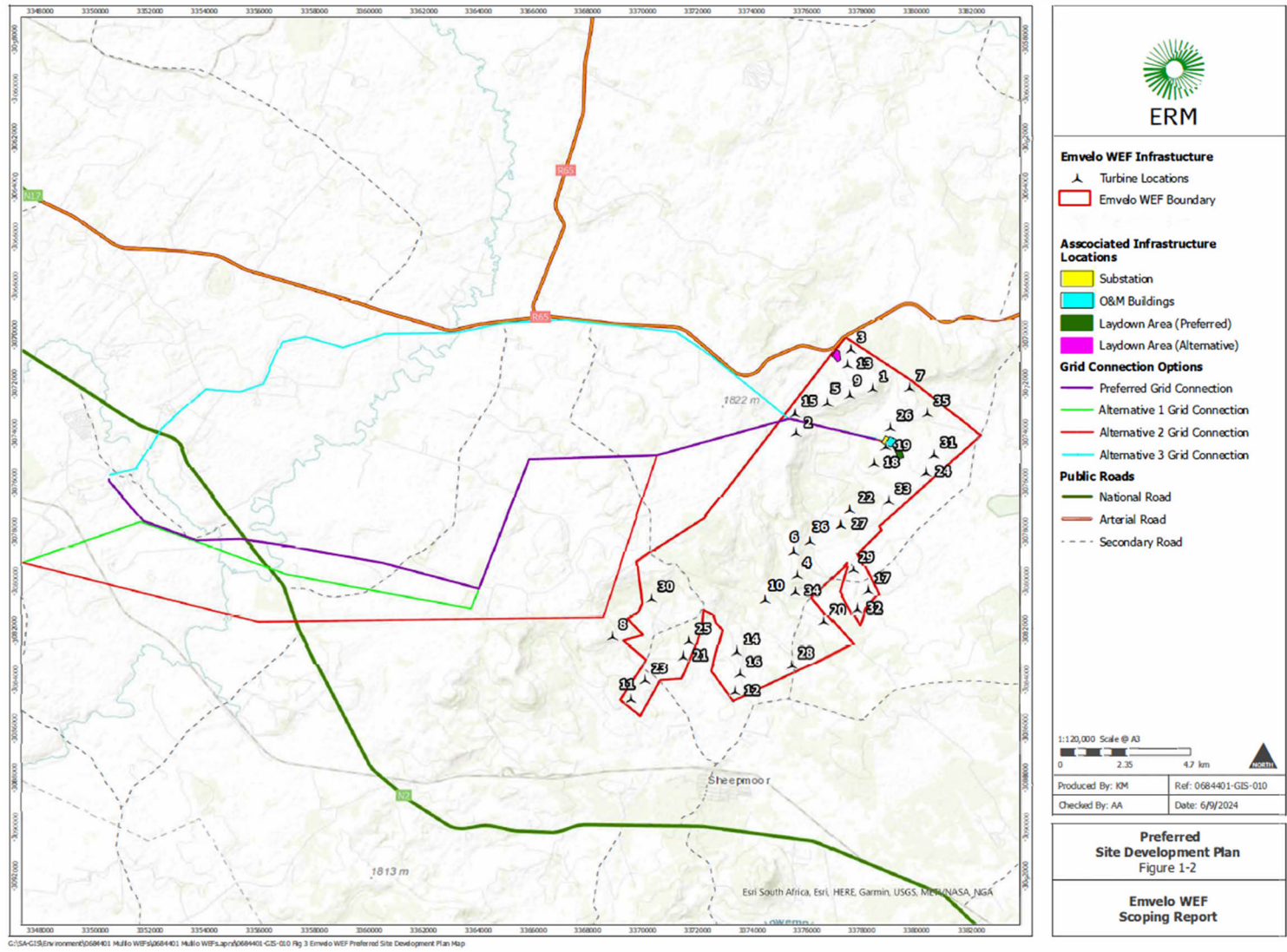


FIGURE 1-2: PRELIMINARY SITE LAYOUT PLAN



2. TERMS OF REFERENCE

The primary objective of the Scoping Process is to present sufficient information to the competent authority (CA) and I&APs on predicted potential impacts and develop the plan of study for the EIA.

In terms of legal requirements, the NEMA EIA Regulations 2014, as amended in 2017⁵, regulate and prescribe the content of the Scoping Report (SR) and specify the type of supporting information that must accompany the submission of the report to the authorities. Table 2-1 shows how and where the legal requirements are addressed in this Scoping Report. Section 9 of this SR provides a summary of the Public Participation Process (PPP), and the final SR will contain the Public Participation undertaken to date. As comments are received on the SR these will be collated and included in the final SR.

As per the EIA Regulations 2014, as amended, *"the objective of the scoping process is to, through a consultative process-*

1. *Identify the relevant policies and legislation relevant to the activity;*
2. *Motivate the need and desirability of the proposed activity, including the need and desirability of the activity in the context of the preferred location;*
3. *identify and confirm the preferred activity and technology alternative through an identification of impacts and risks and ranking process of such impacts and risks;*
4. *identify and confirm the preferred site, through a detailed site selection process, which includes an identification of impacts and risks inclusive of identification of identification of cumulative impacts and a ranking process of all the identified alternatives on the geographical, physical, biological, social, economic, and cultural aspects of the environment;*
5. *identify the key issues to be addressed in the assessment phase;*
6. *agree on the level of assessment to be undertaken, including the methodology to be applied, the expertise required, as well as the extent of further consultation to be undertaken to determine the impacts and risks the activity will impose on the preferred site through the life of the activity, including the nature, significance, consequence, extent, duration, and probability of the impacts to inform the location of the development footprint within the preferred site; and*
7. *identify suitable measures to avoid, manage or mitigate identified impacts to determine the extent of the residual risks that need to be managed or monitored."*

The above activities are completed through consultation with:

- The lead authorities involved in the decision-making for the application (in this case, the Department of Forestry, Fisheries and the Environment (DFFE) for the WEF and the Provincial Department of Agriculture, Rural Development, Land and Environmental Affairs (DARDLEA) for the grid connection);
- I&APs, provincial and local governments, and other relevant organisations to ensure that local issues are well understood; and

⁵ Hereafter referred to as EIA Regulations 2014, as amended.

- The specialist team to ensure that technical issues are identified.

The existing environment within which a proposed development is to be located is investigated, through a review of relevant background literature and ground-truthing and any required long-term on-site monitoring.

A primary objective is to present key stakeholders with the findings of the assessments, obtain and document feedback and address all issues raised.

TABLE 2-1: LEGISLATIVE REQUIREMENTS FOR SCOPE OF ASSESSMENT AND CONTENT OF THE SCOPING REPORT

Appendix 2 Requirements NEMA, 1998 (Act No. 107 of 1998)	Location in SR
2 (1) <i>A scoping report must information that is necessary for a proper understanding of the process, informing all preferred alternatives, including location alternatives, the scope of the assessment, and the consultation process to be undertaken through the environmental impact assessment process, and must include-</i>	
(a) <i>details of-</i> <i>i. the EAP who prepared the report; and</i> <i>ii. the expertise of the EAP, including a curriculum vitae;</i>	Section 2.2 and Appendix A
(b) <i>the location of the activity, including-</i> <i>i. the 21 digit Surveyor General code of each cadastral land parcel;</i> <i>ii. where available, the physical address and farm name;</i> <i>iii. where the required information in items (i) and (ii) is not available, the co-ordinates of the boundary of the property or properties;</i>	Executive Summary
(c) <i>a plan which locates the proposed activity or activities applied for at an appropriate scale, or, if it is-</i> <i>i. a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or</i> <i>ii. on land where the property has not been defined, the coordinates within which the activity is to be undertaken;</i>	Figure 1-1- Site Locality Map
(d) <i>a description of the scope of the proposed activity, including-</i> <i>i. all listed and specified activities triggered;</i> <i>ii. a description of the activities to be undertaken, including associated structures and infrastructure;</i>	Table 3.1 Section 7
(e) <i>a description of the policy and legislative context within which the development is proposed, including an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this activity and are to be considered in the assessment process;</i>	Section 3
(f) <i>a motivation for the need and desirability for the proposed development including the need and desirability of the activity in the context of the preferred location;</i>	Section 8

Appendix 2 Requirements NEMA, 1998 (Act No. 107 of 1998)		Location in SR
(g)	<i>a full description of the process followed to reach the proposed preferred activity, site and location of the development footprint within the site, including-</i>	Section 6 - 8
	<i>i. details of the alternatives considered;</i>	
	<i>ii. details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;</i>	Section 9
	<i>iii. a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them;</i>	Section 9
	<i>iv. the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;</i>	Section 5
	<i>v. the impacts and risks which have informed the identification of each alternative, including the nature, significance, consequence, extent, duration and probability of such identified impacts, including the degree to which these impacts-</i> <i>(aa) can be reversed;</i> <i>(bb) may cause irreplaceable loss of resources; and</i> <i>(cc) can be avoided, managed or mitigated;</i>	Section 10 - 11
	<i>vi. the methodology used in identifying and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives;</i>	Section 4
	<i>vii. positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;</i>	Section 10 - 11
	<i>viii. the possible mitigation measures that could be applied and level of residual risk;</i>	Section 10 - 11
	<i>ix. the outcome of the site selection matrix;</i>	Section 5 - 11
	<i>x. if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and</i>	Section 6
	<i>xi. a concluding statement indicating the preferred alternatives, including preferred location of the activity;</i>	Section 12
(h)	<i>a plan of study for undertaking the environmental impact assessment process to be undertaken, including -</i>	Section 12

Appendix 2 Requirements NEMA, 1998 (Act No. 107 of 1998)	Location in SR
<p>(i) an undertaking under oath or affirmation by the EAP in relation to-</p> <ul style="list-style-type: none"> i. the correctness of the information provided in the report; ii. the inclusion of comments and inputs from stakeholders and interested and affected parties; and iii. any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested or affected parties; 	Appendix A
<p>(j) an undertaking under oath or affirmation by the EAP in relation to the level of agreement between the EAP and interested and affected parties on the plan of study for undertaking the environmental impact assessment;</p>	Appendix A
<p>(k) where applicable, any specific information required by the competent authority; and</p>	n/a
<p>(l) any other matters required in terms of section 24(4)(a) and (b) of the Act.</p>	n/a
<p>2 (2) Where a government notice gazetted by the Minister provides for any protocol or minimum information requirement to be applied to a scoping report, the requirements as indicated in such notice will apply.</p>	Section 3

2.1 STRUCTURE OF THE SCOPING REPORT

The application for EA and assessment of impacts is ultimately a decision-making process with the specific aim of selecting an option that is technically feasible, practical, and will cause the least impact to the environment. The SR contains the following information:

- Nature of the activity;
- Need and desirability of the proposed development;
- Description of the receiving environment;
- Identification of potential feasible alternatives;
- Identification of potential positive and negative impacts;
- Identification of knowledge gaps; and
- A Plan of Study for the EIA phase.

The SR also contains the Plan of Study for the EIA Phase (PSEIA). This plan sets out the proposed approach to the EIA Phase study including the:

- Tasks that will be undertaken, including specialist reports and the manner in which such tasks will be completed;
- Stages at which the CA will be consulted; and
- Description of the methods of assessment and the details of the PPP.

The Scoping Report is set out in two volumes:

- Volume I: Scoping Report
- Volume II: Specialist Scoping Reports
- Volume III: Public Participation Report

The independent environmental assessment practitioner (EAP) and specific specialists identified potential negative and positive impacts that could arise as a result of the proposed development and the PSEIA has been developed. The appointment of specialists was made based on the list of specialists identified by the Screening Report (see Volume II) generated for the proposed development on the DFFE Screening Tool Portal. The structure of the report is provided in Table 2-2 below.

TABLE 2-2: STRUCTURE OF THIS SCOPING REPORT

Section	Title	Containing
Volume I: Scoping Report		Assessment of the Proposed Development
-	Executive Summary	Summary of the Project Specifications, Listed Activities, Specialist Investigations and Findings.
1	Introduction	Project Introduction, and Purpose and Aim of the Report.
2	Terms of Reference	Structure of the SR, Project Team Details, and Assumptions and Limitations of the Study.
3	Environmental Framework	Legal National Environmental Legislation, Applicable Acts, International Conventions and Treaties, Policies and Guidelines.

Section	Title	Containing
4	Scope of Work and Scoping Phase Methodology	Environmental Screening Tool Results, Specialists Studies Methodology, Assessment Techniques for the S&EIA.
5	Description of the Baseline Environment	A Description of the Receiving Environment.
6	Assessment of Alternatives	No-Go, Site Selection, Design Evolution and Technology Alternatives.
7	The Preferred Alternative	Description of the Preferred Proposed Development, including a description of the location, technical specifications and components.
8	Need and Desirability	Brief description of the Need and Desirability of the Proposed Development.
9	Public Participation Process	Initial and Scoping Phase - Public Participation Process, Summary of Issues.
10	Assessment of Potential Impacts	An Assessment of the Potential Impacts during the Construction, Operational and Decommissioning Phases.
11	Assessment of Cumulative Impacts	An Assessment of the Potential Cumulative Impacts.
12	Summary of Findings	A Summary of the Findings.
13	Plan of Study for EIA	Documents aspects requiring further assessment and the assessment methods proposed for the EIA Phase.
Appendix A	EAP Declaration of Independence and CV	EAP Commissioner of Oaths Declaration of Independence and CV.
Volume II: Specialist Scoping Reports		<ul style="list-style-type: none"> • Soil and Agricultural Potential • Aquatic • Terrestrial Biodiversity and Plant • Animal Species • Avifauna • Bats • Visual / Landscape and Flicker • Heritage, Archaeology and Paleontology • Noise • Socio-Economic • Traffic and Transportation
Volume III: Public Participation Report		Public Participation Process to date

2.2 PROJECT TEAM DETAILS

The Applicant, Emvelo Wind Energy Facility (Pty) Ltd, appointed ERM, with the lead EAP being Stephanie Gopaul to co-ordinate and manage the S&EIA application process. The appointed specialist team was based on the results of the DFFE Screening Tool Report generated.

TABLE 2-3: DETAILS OF THE APPLICANT

Name of the Applicant	Emvelo Wind Energy Facility (Pty) Ltd		
Name of contact person for applicant (if other)	Andrew Pearson		
Company Registration Number	2021/770255/07		
BBBEE status	Level 4		
Physical address	Portside, 5 Buitengracht St, Cape Town, 8001		
Postal address	PO Box 548 Howard Place		
Postal code	7450	Cell:	072 796 7733
Telephone	021 685 3240	Fax:	-
E-mail	Andrew@mulilo.com		

TABLE 2-4: DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

Name of the EAP organisation	Environmental Resource Management Southern Africa (Pty) Ltd		
Environmental Assessment Practitioner	Stephanie Gopaul		
Consultant	Sadiya Salie		
Postal address	Building 27, Ground Floor, The Woodlands Office Park, Woodlands Dr, Woodmead, Sandton, 2199		
Telephone	+27105963506	Postal Code:	2199
Cellular	+27 (0)65 666 0066	Fax:	(-) -
E-mail	stephanie.gopaul@erm.com erm.arcusamsterdam@erm.com		
EAP Qualifications	<ul style="list-style-type: none"> Masters in Environmental Management, University of the Free State, South Africa, 2012 BSc. Environmental and Engineering Geology, University of KwaZulu Natal, South Africa, 2005 		

Refer to Appendix A for the EAP's Declaration of Interest and Curriculum Vitae

TABLE 2-5: S&EIA PROJECT TEAM

Discipline	Specialist	Specialist Organisation
ERM	Sadiya Salie	Consultant
Soil and Agricultural Potential	Johann Lanz	Independent Consultant
Aquatic	Dr Brian Colloty	EnviroSci. Pty Ltd
Terrestrial Biodiversity and Plant	Jamie Pote	Independent Consultant
Animal Species	Jonathan Colville	Terrestrial Ecologist & Faunal Surveys

Discipline	Specialist	Specialist Organisation
Avifauna	Albert Froneman	AfriAvian Environmental
Bats	Jonathan Aronson	Camissa Sustainability Consulting
Visual / Landscape and Flicker	Graham Young	Graham Young Landscape Architect
Heritage, Archaeology and Palaeontology	Gavin Anderson	UMLANDO: Archaeological Surveys & Heritage Management
Noise	Morné de Jager	Enviro Acoustic Research
Socio-Economic	Tony Barbour	Independent Consultant
Traffic and Transportation	Reabetswe Mokomele	SMEC South Africa

2.3 DFFE COMMENTS ON THE DRAFT SCOPING REPORT

The table below lists the comments made by the DFFE, the decision-making authority, on Draft Scoping Report (DSR). These comments have been addressed in this Final Scoping Report as per below:

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	Listed activities in the application form mirror those	Please refer to Application form.

	those mentioned in the final SR, an amended application form must be submitted with the final SR.	listed in this Final Scoping Report.	
5.	Please take note of GNR 4143, which was gazetted on the 04 December 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.	The proposed development is not near to an Eskom Main Transmission Substation (MTS) and therefore does not trigger the need for consent 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.	Not Applicable.
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	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	Not Applicable.

	<p>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.</p>	<p>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.</p>	
7.	<p>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 its exclusion, must be provided [including proof of request for comments from the Air Traffic and Navigation Services (ATNS)].</p>	<p>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.</p>	<p>Not Applicable.</p>
8.	<p>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</p>	<p>Specialist Declarations have been included in Volume II.</p>	<p>Please refer to Volume II – Specialist Studies.</p>

	available on Department's website (please use the Department template).		
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 has been 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. Additionally, all the I&APs listed are, or have been added to the I&AP database. The Project Details of the FSR - Volume I, reflects the changes made from DSR to FSR. Further consultation will be done with the Department’s Biodiversity Conservation Directorate during the EIA phase of the project.	Refer to the PP Report – Volume III.

<p>13.</p>	<p>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.</p>	<p>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.</p>	<p>Refer to the PP Report – Volume III.</p>
<p>14.</p>	<p>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.</p>	<p>Original comments received from I&APs and organs of state have been included in Volume III – Public Participation Report.</p>	<p>Refer to the PP Report – Volume III.</p>
<p>15.</p>	<p>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.</p>	<p>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.</p> <p>Where no correspondence has been received, the proof of attempts to retrieve a comment has been provided.</p>	<p>Refer to the PP Report – Volume III.</p>

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 submission must be responded to individually.	Comments from each individual has been responded to individually in the C&R report.	Refer to the PP Report – Volume III.
19.	Please refrain from summarising comments made by I&APs. All comments from I&APs must be	Comments received have been adequately addressed and have not been summarised in the C&R report.	Refer to the PP Report – Volume III.

	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.		
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 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

Noted: The EAP and the Applicant will comply to these requirements.

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).

2.4 ASSUMPTIONS AND LIMITATIONS

The following assumptions and limitations are applicable:

- The assumption is made that the information on which this report is based (baseline studies and project information, as well as existing information) is accurate and correct.
- It is assumed that the information contained in the Screening Tool Reports generated are accurate and correct and valid at the time of preparing this report.
- The project description information provided is preliminary and will require further detailed investigation, which will form part of the subsequent stages of this EIA process. Statements or indicators of significance in this report must be considered considering the uncertainty regarding the exact extent and significance of resources on the site at this stage of the process.
- The general location of the proposed wind turbines, maximum extent of access roads, and the connection of routings have been indicated. The actual position of each wind turbine will be determined by the outcome of the EIA process, as will the exact location of the proposed O&M buildings.
- With respect to specialist assessments, most have assumed that the issues identified are likely to be similar to other proposed WEF projects in the area, and desktop surveys and site visits have been carried out for the Scoping Phase of this EIA. Specialist site visits, and modelling has been undertaken and should further visits be required these will inform the EIA phase of the application process.
- The assumptions and limitations, presented in each specialist report, Volume II of this report, are noted.
- The developments to be included in the cumulative assessment is based on available public information, the most current DFFE database of renewable applications (at the time of writing the report, REEA_OR_2022_Q2.shp⁶), and if the applicant has submitted an application for environmental authorisation.
- It is assumed that the PSEIA phase will be accepted and approved.

⁶ South African Renewable Energy EIA Application Database (<http://egis.environment.gov.za/frontpage.aspx?m=27>).

3. ENVIRONMENTAL LEGAL FRAMEWORK

The proposed development requires environmental authorisation prior to being constructed and operated. This section of the report highlights the important environmental legal considerations taken while undertaking this S&EIA process.

3.1 THE NATIONAL ENVIRONMENT MANAGEMENT ACT, 1998 (ACT NO 107 OF 1998)

Section 2 of the National Environment Management Act, 1998 (NEMA) as amended, lists environmental principles that are to be applied by all organs of state regarding developments that may significantly affect the environment. Included amongst the key principles is the principle that all developments must be socially, economically and environmentally sustainable, and environmental management must place people and their needs at the forefront of its concern, to serve their physical, psychological, developmental, cultural and social interests equitably.

NEMA, as amended, also provides for the participation of potential and registered I&APs and it stipulates that decisions must take the interests, needs and values of all I&APs into account.

Chapter 5 of NEMA, as amended, outlines the general objectives and implementation of Integrated Environmental Management (IEM), the latter providing a framework for the integration of environmental issues into the planning, design, decision-making and implementation of plans and development proposals. Section 24 provides a framework for the granting of environmental authorisations.

To give effect to the general objectives of IEM, the potential impacts on the environment of listed activities must be considered, investigated, assessed and reported to the competent authority. Section 24(4) outlines the minimum requirements for procedures for the investigation, assessment and communication of the potential impact of activities.

3.2 ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REGULATIONS, 2014 AS AMENDED

The EIA Regulations 2014 as amended by GNR 326 of 2017 provide for the control of certain Listed Activities. These activities are listed in Government Notice No. R327 (Listing Notice 1 – Basic Assessment), R325 (Listing Notice 2 – Scoping & EIA Process) and R324 (Listing Notice 3 – Basic Assessment) of 7 April 2017, and are prohibited to commence until environmental authorisation has been obtained from the competent authority, in this case, the Department of Forestry and Fisheries (DFFE).

The DFFE is the competent authority for all renewable energy proposals which will be bid into the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP), as NEMA, as amended, states that:

"24C. (2) The Minister must be identified as the competent authority in terms of subsection (1) if the activity- (a) has implications for international environmental commitments or Relations"

Environmental authorisation, which may be granted subject to conditions, will only be considered upon compliance with GNR982, as amended by GNR326 of 7 April 2017.

Any Environmental Authorisation obtained from the DFFE applies only to those specific listed activities for which the application was made. To ensure that all Listed Activities that could potentially be applicable to this proposal are covered by the Environmental Authorisation, a precautionary approach is followed when identifying listed activities, that is, if an activity could potentially be part of the proposed development, it is listed.

The Listed Activities applicable to this proposed project are presented in Table 3-1 below. All potential impacts associated with these Listed Activities will be considered and adequately assessed in this authorisation process.

TABLE 3-1: NEMA LISTED ACTIVITIES IN RELATION TO THE PROPOSED DEVELOPMENT

Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notices of the EIA Regulations, 2014 as amended.	Describe the portion of the proposed project to which the applicable listed activity relates.
Activity No(s):	Provide the relevant Scoping and EIR Activity (ies) as set out in Listing Notice 1 of the EIA Regulations, 2014 as amended.	Describe the portion of the proposed project to which the applicable listed activity relates.
Listing Notice 1 GN R 327 Activity 11	<i>The development of facilities or infrastructure for the transmission and distribution of electricity— (i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts.</i>	The facility will include the construction of one onsite substation and 132 kV overhead transmission powerline to facilitate the connection between the WEF and the national grid. The facility will be constructed across various farm portions outside urban areas.
Listing Notice 1 GN R 327 Activity 12	<i>The development of— (ii) infrastructure or structures with a physical footprint of 100 square metres or more; where such development occurs— (a) within a watercourse; (c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse;</i>	The facility will entail the construction of built infrastructure and structures (such as wind turbines, hardstands, offices, workshops, O&M buildings, ablation facilities, onsite substations, laydown areas and security enclosures etc.). The infrastructure and structures are expected to exceed a footprint of 100 m ² and some may occur within small drainage features and 32 m of the watercourses.
Listing Notice 1 GN R 327 Activity 14	<i>The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres.</i>	Construction of the facility will require dangerous goods in the form of hydrocarbon fuels (e.g., diesel), paints and solvents, oils and greases. Sewage and waste streams will be generated by the WEF. During construction of the WEF, the combined capacity of dangerous goods on site will exceed 80 cm ³ . The proposed on-site substation is likely to require the use of transformer oils/other hazardous substances during the operational phase.
Listing Notice 1	<i>The infilling or depositing of any material of more than 10 cubic metres</i>	The facility will entail the excavation, removal and moving of more than 10 m ³ of

Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notices of the EIA Regulations, 2014 as amended.	Describe the portion of the proposed project to which the applicable listed activity relates.
GN R 327 Activity 19	<i>into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse;</i>	soil, sand, pebbles, or rock from nearby watercourses on site, mainly for the purpose of constructing access roads.
Listing Notice 1 GN R 327 Activity 24	<i>The development of a road— (ii) with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 metres;</i>	Roads with a reserve wider than 13.5 meters are proposed for the facility. As required by Eskom, a service and maintenance road of 8m wide is required to be constructed underneath the OHL, for construction and maintenance purposes.
Listing Notice 1 GN R 327 Activity 27	<i>The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for - the undertaking of a linear activity; or maintenance purposes undertaken in accordance with a maintenance management plan.</i>	The facility will entail the construction of infrastructure with a combined physical footprint of more than 1 ha that will require clearance of indigenous vegetation.
Listing Notice 1 GN R 327 Activity 28	<i>Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare.</i>	The facility will take place outside of an urban area and across several adjoining farm portions and will have an estimated total development footprint of more than 20 ha.
Listing Notice 1 GN R 327 Activity 48	<i>The expansion of (i) infrastructure or structures where the physical footprint is expanded by 100 square metre or more, Where such expansion occurs within a watercourse; and (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse.</i>	The facility will require the upgrading of existing roads within the project area, as well as watercourse crossing upgrades, where such upgrades may take place within watercourses and within 32 m from the edge of these watercourses. The total footprint of the upgrades to be undertaken on the existing roads would be more than 100 m ² within a watercourse, or within 32 m of a watercourse.
Listing Notice 1 GN R 327 Activity 56	<i>The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre- (ii) where no reserve exists, where the existing road is wider than 8 metres;</i>	Existing farm access roads will be widened or lengthened. These roads would currently have no road reserve and will be wider than 8 meters in some areas during construction phase of the development.
Activity No(s):	Provide the relevant Scoping and EIR Activity(ies) as set out in Listing Notice 2 of the EIA Regulations, 2014 as amended.	Describe the portion of the proposed project to which the applicable listed activity relates.

<p>Activity No(s):</p>	<p>Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notices of the EIA Regulations, 2014 as amended.</p>	<p>Describe the portion of the proposed project to which the applicable listed activity relates.</p>
<p>Listing Notice 2 GN R 325 Activity 1</p>	<p><i>The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more</i></p>	<p>The WEF will have a total generation capacity output of more than 20 MW. The facility is not situated within a REDZ or a strategic power corridor. A full S&EIA process will be undertaken.</p>
<p>Listing Notice 2 GN R 325 Activity 15</p>	<p><i>The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for- the undertaking of a linear activity; maintenance purposes undertaken in accordance with a maintenance management plan.</i></p>	<p>The total development footprint of the facility is expected to be more than 20 ha. As a result, more than 20 ha of indigenous vegetation may be removed for the construction of the proposed projects.</p>
<p>Activity No(s):</p>	<p>Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notice 3 of the EIA Regulations, 2014 as amended.</p>	<p>Describe the portion of the proposed project to which the applicable listed activity relates.</p>
<p>Listing Notice 3 GN R 324 Activity 4</p>	<p><i>The development of a road wider than 4 metres with a reserve less than 13,5 metres.</i> <i>f. Mpumalanga</i> <i>i. Outside urban areas:</i> <i>(bb) National Protected Area Expansion Strategy Focus areas;</i> <i>(ee) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;</i></p>	<p>Roads with a reserve wider than 4 meters are proposed for the facility. As required by Eskom, a service and maintenance road of 8m wide is required to be constructed underneath the OHL, for construction and maintenance purposes.</p>
<p>Listing Notice 3 GN R 324 Activity 10</p>	<p><i>The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres.</i> <i>f. Mpumalanga</i> <i>i. Outside urban areas:</i> <i>(bb) National Protected Area Expansion Strategy Focus areas;</i> <i>(ee) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;</i></p>	<p>Construction of the facility will require dangerous goods in the form of hydrocarbon fuels (e.g., diesel), paints and solvents, oils and greases. Sewage and waste streams will be generated by the WEF. During construction of the WEF, the combined capacity of dangerous goods on site will not exceed 80 cm³. The proposed on-site substation is likely to require the use of transformer oils/other hazardous substances during the operational phase.</p>
<p>Listing Notice 3 GN R324 Activity 12</p>	<p><i>The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes</i></p>	<p>The facility will require the clearance of natural vegetation in excess of 300 m² in areas of natural vegetation. A portion of the respective facility is located within a Critical Biodiversity area in the Mpumalanga Province.</p>

Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notices of the EIA Regulations, 2014 as amended.	Describe the portion of the proposed project to which the applicable listed activity relates.
	<p><i>undertaken in accordance with a maintenance management plan.</i></p> <p><i>f. Mpumalanga</i></p> <p><i>ii. Within critical biodiversity areas identified in bioregional plans;</i></p>	
<p>Listing Notice 3 GN R324 Activity 14</p>	<p><i>The development of—</i></p> <p><i>(ii) infrastructure or structures with a physical footprint of 10 square metres or more;</i></p> <p><i>f. Mpumalanga</i></p> <p><i>i. Outside urban areas:</i></p> <p><i>(bb) National Protected Area Expansion Strategy Focus areas;</i></p> <p><i>(ff) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;</i></p>	<p>The facility will likely entail the development of infrastructure with physical footprints of 10m² or more within a watercourse / surface water feature or within 32m from the edge of a watercourse / surface water feature.</p> <p>Although the layout will be designed to avoid the identified surface water features / watercourse as far as possible, some of the infrastructure / structures will likely need to traverse the identified surface water features / watercourses.</p> <p>The construction of the infrastructure (MV cabling and roads) for the development will occur within Critical Biodiversity Areas (CBAs) located outside of urban areas.</p>
<p>Listing Notice 3 GN R324 Activity 18</p>	<p><i>The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre.</i></p> <p><i>f. Mpumalanga</i></p> <p><i>i. Outside urban areas:</i></p> <p><i>(bb) National Protected Area Expansion Strategy Focus areas;</i></p> <p><i>(ee) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;</i></p>	<p>Internal access roads will be required to access the wind turbines as well as the respective substation. Existing roads will be used wherever possible. Internal access roads will thus likely be widened by more than 4 m or lengthened by more than 1 km. These roads will occur within the Mpumalanga Province, outside urban areas.</p>
<p>Listing Notice 3 GN R324 Activity 23</p>	<p><i>The expansion of—</i></p> <p><i>infrastructure or structures where the physical footprint is expanded by 10 square metres or more; where such expansion occurs—</i></p> <p><i>(a) within a watercourse;</i></p> <p><i>(c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse;</i></p> <p><i>f. Mpumalanga</i></p> <p><i>i. Outside urban areas:</i></p> <p><i>(bb) National Protected Area Expansion Strategy Focus areas;</i></p> <p><i>(ee) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;</i></p>	<p>The facility will likely entail the development and expansion of roads by 10m² or more within a surface water feature / watercourse or within 32 m from the edge of a surface water feature / watercourse.</p> <p>Although the layout will be designed to avoid the identified surface water features / watercourses as far as possible, some of the existing internal and access roads may likely need to traverse some of the identified surface water features / watercourses.</p> <p>The proposed developments occur within CBAs, and are located outside urban areas.</p>

3.3 THE NATIONAL HERITAGE RESOURCES ACT, 1999 (ACT NO 25 OF 1999 - NHRA)

Section 38 (1) of the National Heritage Resources Act, 1999 (NHRA) lists development activities that would require authorisation by the responsible heritage resources authority. Activities considered applicable to the proposed project include the following:

- “(a) The construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier exceeding 300 m in length;
- (c) any development or other activity which will change the character of a site; and
- (i) exceeding 5000 m² in extent.”

The NHRA, 1999, requires that a person intending to undertake such an activity must notify the relevant national and provincial heritage authorities at the earliest stages of initiating such a development. The relevant heritage authority would then in turn, notify the person whether a Heritage Impact Assessment Report should be submitted. According to Section 38(8) of the NHRA, 1999, a separate report would not be necessary if an evaluation of the impact of such development on heritage resources is required in terms of the Environment Conservation Act, 1989 (No. 73 of 1989) (ECA) (now replaced by NEMA, Act 107 of 1998) or any other applicable legislation. The decision-making authority must ensure that the heritage evaluation fulfils the requirements of the NHRA, 1999, and take into account any comments and recommendations made by the relevant heritage resources authority.

The Heritage Impact Assessment, which forms part of this S&EIA process will be submitted to the South African Heritage Resources Authority (SAHRA) for comment.

In South Africa, the law is directed towards the protection of human-made heritage, although places and objects of scientific importance are covered. The NHRA, 1999, also protects intangible heritage such as traditional activities, oral histories and places where significant events happened. While not specifically mentioned in the NHRA, scenic routes are recognised as a category of heritage resources which requires grading as the Act protects area of aesthetic significance.

The heritage impact assessment reports will be submitted to the SAHRA for comment.

3.4 NATIONAL DEPARTMENT OF AGRICULTURE, LAND REFORM AND RURAL DEVELOPMENT (DALRRD)

A renewable energy facility requires approval from the National Department of Agriculture, Land Reform and Rural Development (DALRRD) if the facility is on agriculturally zoned land. A *No Objection Letter* for the change in land use is required. This letter is one of the requirements for receiving municipal rezoning. This application requires a motivation backed by good evidence that the development is acceptable in terms of its impact on the agricultural production potential of the development site.

3.4.1 SUBDIVISION OF AGRICULTURAL LAND ACT, 1970 (ACT NO. 70 OF 1970 - SALA)

In terms of the Subdivision of Agricultural Land Act, 1970, any application for change of land use must be approved by the Minister of Agriculture. This is a consent for long-term lease in terms of the SALA. If DALRRD approval for the development has already been obtained in the form of the No Objection letter, then SALA approval should not present any difficulties. Note that SALA approval is not required if the lease is over the entire farm portion. SALA approval (if required) can only be applied for once the Municipal Rezoning Certificate and Environmental Authorisation has been obtained.

3.5 CONSERVATION OF AGRICULTURAL RESOURCES, 1983 (ACT NO. 43 OF 1983)

The Conservation of Agricultural Resources Act (CARA), 1983 states that no degradation of natural land is permitted. The Act requires the protection of land against soil erosion and the prevention of water logging and salinization of soils by means of suitable soil conservation works to be constructed and maintained. The utilisation of marshes, water sponges and watercourses are also addressed.

Rehabilitation after disturbance to agricultural land is managed by the CARA. A consent in terms of CARA is required for the cultivation of virgin land. Cultivation is defined in CARA as "any act by means of which the topsoil is disturbed mechanically". The purpose of this consent for the cultivation of virgin land is to ensure that only land that is suitable as arable land is cultivated. Therefore, despite the above definition of cultivation, disturbance to the topsoil that results from the construction of a renewable energy facility and its associated infrastructure does not constitute cultivation as it is understood in CARA. This has been corroborated by Anneliza Collett (Acting Scientific Manager: Natural Resources Inventories and Assessments in the Directorate: Land and Soil Management of the Department of Agriculture, Land Reform and Rural Development (DALRRD)). The construction and operation of the facility will therefore not require consent from the Department of Agriculture, Land Reform and Rural Development in terms of this provision of CARA.

3.6 NATIONAL VELD AND FOREST FIRE ACT, 1998 (ACT NO. 101 OF 1998)

The purpose of the National Veld and Forest Fire Act, as amended by the National Fire Laws Amendment Act (Act 12 of 2001), is to prevent and combat veld, forest and mountain fires throughout South Africa. The Act applies to the open countryside beyond the urban limit and puts in place a range of requirements. It also specifies the responsibilities of landowners. The term 'owners' includes lessees, people in control of land, the executive body of a community, the manager of State land, and the chief executive officer of any local authority. The requirements include, but are not limited to, the maintenance of firebreaks and availability of firefighting equipment to reasonably prevent the spread of fires to neighbouring properties.

3.7 THE ENVIRONMENT CONSERVATION ACT, 1989 (ACT NO.73 OF 1989), THE NATIONAL NOISE CONTROL REGULATIONS: GN R154 OF 1992

The Environment Conservation Act, 1989 (ECA) allows the Minister of Environmental Affairs and Tourism (now the "Minister of Forestry, Fisheries and the Environment") to make regulations regarding noise, amongst other concerns. The Minister has made noise control regulations under the ECA.

In terms of section 25 of the ECA, the national noise-control regulations (NCR) were promulgated (GN R154 in *Government Gazette* No. 13717 dated 10 January 1992). The NCRs were revised under Government Notice Number R. 55 of 14 January 1994 to make it obligatory for all authorities to apply the regulations.

Subsequently, in terms of Schedule 5 of the Constitution of South Africa of 1996 legislative responsibility for administering the NCR was devolved to provincial and local authorities.

These regulations define "**disturbing noise**" as:

"Noise level which exceeds the zone sound level or, if no zone sound level has been designated, a noise level which exceeds the ambient sound level at the same measuring point by 7 dBA or more".

These Regulations prohibits anyone from causing a disturbing noise. The Noise Assessment will take these Regulations into consideration when identifying and assessing the potential noise impacts associated with the proposed development.

3.8 NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 2004 (ACT NO. 39 OF 2004)

Section 34 of the Air Quality Act, 2004 (AQA) makes provision for:

1. The Minister to prescribe essential national noise standards –
For the control of noise, either in general or by specified machinery or activities or in specified places or areas; or
For determining –
a definition of noise; and
the maximum levels of noise.
2. When controlling noise, the provincial and local spheres of government are bound by any prescribed national standards.

This section of the Act is in force, but no such standards have yet been promulgated.

An atmospheric emission license issued in terms of Section 22 may contain conditions in respect of noise. This however will not be relevant to this proposed development.

3.8.2 NATIONAL DUST CONTROL REGULATIONS, 2013

The National Environmental Management: Air Quality Act, 2004 (Act 39 of 2004), makes provision for national dust control regulations. These regulations prescribe dust fall standards for residential and non-residential areas. These Regulations also provide for dust monitoring, control and reporting.

The acceptable dust fall out rates are:

Restriction Area	Dust Fall (D) (mg/m ² /day, 30-day average)	Permitted Frequency of exceedance
Residential	D<600	Two within a year, not sequential months
Non- Residential	600 <D< 1200	Two within a year, not sequential months

These rates are to be adhered to by the developer during the life of the project.

3.9 NATIONAL WATER ACT, 1998 (ACT NO. 36 OF 1998 - NWA)

The National Water Act, 1998 (NWA) provides for constitutional requirements including pollution prevention, ecological and resource conservation and sustainable utilisation. In terms of this Act, all water resources are the property of the State.

A water resource includes any watercourse, surface water, estuary or aquifer, and, where relevant, its bed and banks. A watercourse is interpreted as a river or spring; a natural channel in which water flows regularly or intermittently; a wetland lake or dam into which or from which water flows; and any collection of water that the Minister may declare to be a watercourse.

Relevant water uses for the proposed construction of the WEF which will require access roads over watercourses and drainage channels and boreholes for construction water, in terms of Section 21 of the Act include but are not limited to the following:

- Section 21 (a): Abstraction of water from boreholes and rivers or dams;
- Section 21 (c): Impeding or diverting the flow of water in a watercourse;
- Section 21 (i): Altering the bed, banks, course or characteristics of a watercourse; and
- Section 21 (g): Storage of domestic waste in conservancy tanks.

GN 1199 of 18 December 2009 grants general authorisation (GA) for the above water uses based on certain conditions. It also stipulates that these water uses must be registered with the responsible authority.

Pollution of river water is a contravention of the NWA. Chapter 3, Part 4 of the NWA deals with pollution prevention and in particular the situation where pollution of a water resource occurs or might occur as a result of activities on land. The person who owns, controls, occupies or uses the land in question is responsible for taking measures to prevent pollution of water resources.

Chapter 3, Part 5 of the NWA deals with pollution of water resources following an emergency incident, such as an accident involving the spilling of a harmful substance that finds or may find its way into a water resource. The responsibility for remedying the situation rests with the person responsible for the incident or the substance involved.

3.9.1 PERMIT REQUIREMENTS

A Water Use License Application (WULA) or a GA may be required. This will be determined by the Department of Human Settlement, Water and Sanitation (DHSWS) during the WULA pre-application process.

This process will run separately to this environmental authorisation application process.

3.10 NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT, 2004 (ACT NO. 10 OF 2004 - NEMBA)

3.10.1 THREATENED OR PROTECTED SPECIES LIST, 2015

Amendments to the Threatened or Protected Species (TOPS) list were published on 31 March 2015 in Government Gazette No. 38600 and Notice 256 of 2015. Certain flora and fauna that occur on the site may be threatened or protected.

3.10.2 ALIEN AND INVASIVE SPECIES REGULATIONS, 2016

The Act and Regulations set out various degrees of Invasive Species (Plants, Insects, Birds, Animals, Fish and Water Plants) and requires that certain of those invasive species are documented and, in some cases, removed from properties in South Africa.

The Regulations list 4 categories of invasive species that must be managed, controlled or eradicated from areas where they may cause harm to the environment, or that are prohibited to be brought into South Africa. A Terrestrial Ecology Assessment will be conducted as part of this S&EIA process to identify as well as propose ways in which to manage alien invasive species found at the proposed site area.

3.11 THE NATURE AND ENVIRONMENTAL CONSERVATION ORDINANCE NO. 19 OF 1974

The Ordinance was developed to protect both animal and plant species within the various provinces of the country which warrant protection. These may be species which are under threat, or which are already considered to be endangered and species are listed in the relevant documents. Specialists Assessment will be conducted as part of this S&EIA process to identify threatened or endangered species or species of concern present on site. These assessments will also propose methods in which to mitigate the associated impacts on such species.

3.12 NATIONAL FORESTS ACT, 1998 (ACT NO. 84 OF 1998 - NFA)

This act lists protected tree species and prohibits certain activities. The prohibitions provide that *"no person may cut, damage, disturb, destroy or remove any protected tree, or collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree, except under a licence granted by the Minister"*. Any protected tree species recorded within the proposed site area shall be managed in accordance with the NFA.

3.13 ASTRONOMY GEOGRAPHIC ADVANTAGE ACT, 2007 (ACT. 21 OF 2007)

The Act provides for the preservation and protection of areas within the Republic that are uniquely suited for optical and radio astronomy. The Square Kilometer Array radio telescope is located in the declared Karoo Central Advantage Array and as such it is protected against harmful interference from wireless communication and electromagnetic emissions from electrical equipment. According to the DFFE Screening Tool, there were no Weather Radar installations within a 60km radius.

3.14 NATIONAL ROAD TRAFFIC ACT, 1996 (ACT NO. 93 OF 1996) (NRTA)

The technical recommendations for highways (TRH 11): "*Draft Guidelines for Granting of Exemption Permits for the Conveyance of Abnormal Loads and for other Events on Public Roads*" outline the rules and conditions which apply to the transport of abnormal loads and vehicles on public roads and the detailed procedures to be followed in applying for exemption permits are described and discussed.

Legal axle load limits and the restrictions imposed on abnormally heavy loads are discussed in relation to the damaging effect on road pavements, bridges, and culverts.

The general conditions, limitations, and escort requirements for abnormally dimensioned loads and vehicles are also discussed and reference is made to speed restrictions, power/mass ratio, mass distribution, and general operating conditions for abnormal loads and vehicles. Provision is also made for the granting of permits for all other exemptions from the requirements of the National Road Traffic Act and the relevant Regulations.

The South African National Roads Authority (SANRAL) and the Provincial Department of Transport would act as a Competent/Commenting Authority, as a result of the proposed road infrastructure associated with the Emvelo WEF.

3.15 CIVIL AVIATION ACT, 2009 (ACT NO. 13 OF 2009) (CAA)

The Civil Aviation Act, 2009 (Act No. 13 of 2009) (CAA), governs civil aviation in the Republic. The Act provides for the establishment of a stand-alone authority mandated with the controlling, promoting, regulating, supporting, developing, enforcing and continuously improving levels of safety and security throughout the civil aviation industry. This mandate is fulfilled by the South African Civil Aviation Authority (SACAA), an agency of the Department of Transport (DoT).

The SACAA achieves the objectives of the Act by complying with the Standard and Recommended Practices (SARPs) of the International Civil Aviation Organisation (ICAO), while considering the local context when issuing the South African Civil Aviation Regulations (SA CARs). All proposed developments or activities in South Africa that potentially could affect civil aviation (such as Wind Farms) must be assessed by SACCAA in terms of the CARs and the South African Civil Aviation Technical Standards (SA CATs), in order to ensure civil aviation safety.

The SACAA and Air Traffic Navigation Services (ATNS) is included as a stakeholder and will continue to be provided with an opportunity to comment during the public participation period.

3.16 PROMOTION OF ACCESS TO INFORMATION ACT, 2000 (ACT NO. 2 OF 2002) (PAIA)

The PAIA gives effect to the constitutional right of access to any information held by the state and any information that is held by another person and that is required for the exercise or protection of any rights; and to provide for matters connected therewith. The PAIA will be adhered to during all stakeholder engagement activities undertaken as part of this S&EIA process.

3.17 NATIONAL ENVIRONMENTAL MANAGEMENT ACT: NATIONAL APPEALS REGULATIONS, 2014

The purpose of these regulations is to regulate the procedure contemplated in section 43(4) of the National environmental management act relating to the submission, processing and consideration of a decision on an appeal. This Act is used to help guide and understand the appeal process and the procedures may follow.

3.18 ADDITIONAL RELEVANT LEGISLATION

The applicant must also comply with the provisions of other relevant national legislation. Additional relevant legislation that has informed the scope and content of this S&EIA Report includes the following:

- Constitution of the Republic of South Africa, 1996 (Act No. 108, 1996);
- Aviation Act, 1962 (Act No. 74, 1962);
- National Environmental Management: Waste Act, 2008 (Act No. 59, 2008);
- National Environmental Management: Protected Areas Act, 2003 (Act No. 57, 2003);
- National Roads Act, 1998 (Act No. 7, 1998)
- Occupational Health and Safety Act, 1993 (Act No. 85 of 1993);
- National Veld and Forest Fire Bill of 10 July 1998;
- Fertiliser, Farm Feeds, Agricultural Remedies and Stock Remedies Act, 1947 (Act No. 36 of 1947);
- Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002);
- Independent Communications Authority of South Africa Act, 2000 (Act No. 13 of 2000; as amended); and
- Screening Report referred to in Regulation 16(1)(v) of the Environmental Impact Assessment Regulations 2014, as amended.

3.19 CONVENTIONS AND TREATIES

3.19.1 THE PARIS AGREEMENT (2016)

South Africa is one of 195 countries that are signatory to The Paris Agreement. The Paris Agreement is a legally binding instrument within the United Nations Framework Convention on Climate Change (UNFCCC) that provides guidance for action on climate change, focusing on sustainable development and poverty eradication. It sets the goal of preventing increase in global average temperature to below 2 degrees Celsius and pursuing efforts to limit global temperature increase to 1.5 degrees Celsius. Previous Minister of the DFFE, Ms Edna Molewa, signed the Paris Agreement on Climate Change on behalf of South Africa on 22 April 2016.⁷

The proposed WEF fits the emission reduction targets of the Paris Agreement and its aim of sustainable development.

3.20 NATIONAL CLIMATE CHANGE RESPONSE WHITE PAPER (2011)

Climate change is already a measurable reality and along with other developing countries, South Africa is especially vulnerable to its impacts. This White Paper presents the South African Government's vision for an effective climate change response and the long-term, just transition to a climate-resilient and lower-carbon economy and society. South Africa's response to climate change has two objectives:

- Effectively manage inevitable climate change impacts through interventions that build and sustain South Africa's social, economic and environmental resilience and emergency response capacity.
- Make a fair contribution to the global effort to stabilise greenhouse gas (GHG) concentrations in the atmosphere at a level that avoids dangerous anthropogenic interference with the climate system within a timeframe that enables economic, social and environmental development to proceed in a sustainable manner.

3.21 THE CONVENTION ON BIOLOGICAL DIVERSITY (CBD) (1993)

This is a multilateral treaty for the international conservation of biodiversity, the sustainable use of its components and fair and equitable sharing of benefits arising from natural resources. Signatories have the sovereign right to exploit their own resources pursuant to their own environmental policies, and the responsibility to ensure that activities within their jurisdiction or control do not cause damage to the environment of other States or of areas beyond the limits of national jurisdiction. South Africa became a signatory to the CBD in 1993, which was ratified in 1995.

The convention prescribes that signatories identify components of biological diversity important for conservation and monitor these components in light of any activities that have been identified which are likely to have adverse impacts on biodiversity. The CBD is based on the precautionary principle which states that where there is a threat of significant reduction or loss of biological diversity, lack of full scientific certainty should not be used

⁷https://www.environment.gov.za/mediarelease/southafrica_ratifies_parisagreement (accessed on 24 January 2019).

as a reason for postponing measures to avoid or minimise such a threat and that in the absence of scientific consensus the burden of proof that the action or policy is not harmful falls on those proposing or taking the action.

3.21.1 THE RAMSAR CONVENTION (1971)

The Convention on Wetlands, called the Ramsar Convention, as it was adopted in the Iranian city of Ramsar in 1971 and came into force in 1975, is an intergovernmental treaty that provides the framework for the conservation and wise use of wetlands and their resources. Under the three pillars of the convention the Contracting Parties commit to work towards the wise use of all their wetlands through national plans, policies and legislation, management actions and public education; designate suitable wetlands for their list of Wetlands of International Importance (the "Ramsar List") and ensure their effective management; and Cooperate internationally on transboundary wetlands, shared wetland systems, shared species, and development projects that may affect wetlands.

3.21.2 THE CONVENTION ON THE CONSERVATION OF MIGRATORY SPECIES OF WILD ANIMALS (CMS OR BONN CONVENTION) (1983)

An intergovernmental treaty, concluded under the sponsorship of the United Nations Environment Programme, concerned with the conservation of wildlife and habitats on a global scale. The fundamental principles listed in Article II of this treaty state that signatories acknowledge the importance of migratory species being conserved and agree to take action to this end "*whenever possible and appropriate*", "*paying special attention to migratory species the conservation status of which is unfavourable and taking individually or in cooperation appropriate and necessary steps to conserve such species and their habitat*".

3.21.3 THE AGREEMENT ON THE CONSERVATION OF AFRICAN-EURASIAN MIGRATORY WATERBIRDS (AEWA) (1999)

An intergovernmental treaty developed under the framework of the Convention on Migratory Species (CMS), concerned with the coordinated conservation and management of migratory waterbirds throughout their entire migratory range. Signatories of the Agreement have expressed their commitment to work towards the conservation and sustainable management of migratory waterbirds, paying special attention to endangered species as well as to those with an unfavourable conservation status. The assessment of the ecology and identification of sites and habitats for migratory waterbirds is required to coordinate efforts that ensure that networks of suitable habitats are maintained and investigate problems likely posed by human activities.

3.22 POLICIES AND GUIDELINES

3.22.1 ENVIRONMENTAL IMPACT ASSESSMENT GUIDELINES

Relevant guidelines and policies as applicable to the management of the S&EIA process and to this application have also been taken into account, as indicated below:

- IEM Guideline Series (Series 3): Stakeholder engagement (2002);
- IEM Guideline Series (Series 4): Specialist studies (2002);

- IEM Guideline Series (Series 5): Impact Significance (2002);
- IEM Guideline Series (Guideline 5): Companion to the EIA Regulations 2010 (October 2012);
- IEM Guideline Series (Series 7): Cumulative Effects Assessment (2002);
- IEM Guideline Series (Guideline 7): Public Participation in the EIA process (October 2012);
- IEM Guideline Series (Series 7): Alternatives in the EIA process (2002);
- IEM Guideline Series (Guideline 9): Draft guideline on need and desirability in terms of the EIA Regulations 2010 (October 2012);
- DEA (2017) Guideline on Need and Desirability, Department of Environmental Affairs (DEA) Pretoria, South Africa (2017);
- IEM Guideline Series (Series 12): Environmental Management Plans (EMP) (2002); and
- IEM Guideline Series (Series 15): Environmental impact reporting (2002).

3.22.2 THE EQUATOR PRINCIPLES (EPS) III, 2013

The principles applicable to the project are likely to include:

- Principle 2: Environmental and Social Assessment;
- Principle 3: Applicable Environmental and Social Standards;
- Principle 4: Environmental and Social Management System and Equator Principles Action Plan;
- Principle 5: Stakeholder Engagement;
- Principle 6: Grievance Mechanism;
- Principle 7: Independent Review;
- Principle 8: Covenants;
- Principle 9: Independent Monitoring and Reporting; and
- Principle 10: Reporting and Transparency.

These principles, among various requirements, include a requirement for an assessment process and an Environmental and Social Management Plan (ESMP) to be prepared by the client to address issues raised in the assessment process and incorporate actions required to comply with the applicable standards, and the appointment of an independent environmental expert to verify monitoring information.

3.22.3 SOUTH AFRICAN WIND ENERGY FACILITY GUIDELINES

The following guidelines are relevant to the proposed WEF and the potential impacts they may have on bats/avifauna and habitat that support bats/avifauna:

- South African Best Practice Guidelines for Pre-Construction Monitoring of Bats at Wind Energy Facilities. 5th Edition. 2020;
- South African Best Practice Guidelines for Operational Monitoring of Bats at Wind Energy Facilities. 5th Edition. 2020;

- South African Bat Fatality Threshold Guidelines. Edition 2. 2018;
- The Species Environmental Assessment Guideline (SANBI, 2020);
- Best-Practice Guidelines for assessing and monitoring the impact of wind-energy facilities on birds in southern Africa. Third Edition, 2015;
- Best Practice Guidelines for Verreaux's Eagle and Wind Energy (BirdLife South Africa, 2017), and the more recent draft update of these: Verreaux's Eagles and Wind Farms (BirdLife South Africa, 2021);
- The Southern African Bird Atlas Project 2 data, available at the pentad level (<http://sabap2.adu.org.za/v1/index.php>) (accessed at www.mybirdpatch.adu.org.za);
- IUCN 2021. The IUCN List of Threatened Species. 2021 - 3. <http://www.iucnredlist.org/>;
- Wind Energy Impacts on Birds in South Africa: A Preliminary review of the results of operational monitoring at the first wind farms of the Renewable Energy Independent Power Producer Procurement Programme in South Africa. BLSA. Occasional Report Series: 2;
- On a collision course: the large diversity of birds killed by wind farms in South Africa (Perold et al. 2020);
- Birds & Renewable Energy. Update for 2019. BirdLife South Africa. Birds and Renewable Energy Forum, 10 October 2019; and
- Avian Wind Farm Sensitivity Map. Birdlife South Africa. <http://www.birdlife.org.za/conservation/birds-and-wind-energy/windmap>.

3.22.4 INTERNATIONAL FINANCE CORPORATION (IFC) PERFORMANCE STANDARDS

The IFC's Performance Standards on Social and Environmental Sustainability (Referred to as Performance Standards hereinafter) is an environmental and social risk management tool provided by the IFC for its investment and financing clients, and is also one of the major applicable standards of the Equator Principles. As the global influence of the Equator Principles has continued to rise, more and more Equator Principles Financial Institutions (EPFI) have been applying the Performance Standards in their assessments of environmental and social impacts. Under this backdrop, the Performance Standards have become the world's leading system and tool for environmental and social risk management.

The IFC Performance Standards encompass eight topics as described in Table 3-2 below. Given that South Africa has a complex and well-balance environmental regulatory system, the IFC Performance Standards are wholly addressed in the NEMA, 1998, as amended, framework.

For reference purposes the Project Applicant, will be referred to as the 'Borrower' in Table 3-2.

The project will not have adverse impacts on PS5: Land Acquisition and Involuntary Resettlement and PS7: Indigenous Peoples as there is no displacement or resettlement, and none such indigenous people are found in the proposed development area of influence.

TABLE 3-2: DESCRIPTION OF THE IFC PERFORMANCE STANDARDS

PS Description	Project Applicability
<p>Performance Standard 1: Assessment and Management of Environmental and Social (E&S) Risks and Impacts Objective: Underscores the importance of identifying E&S risks and impacts and managing E&S performance throughout the life of a project.</p>	
<p>Borrowers are required to manage the environmental and social performance of their business activity, which should also involve communication between the Borrower/Investee, its workers and the local communities directly affected by the business activity. This requires the development of a good management system, appropriate to the size and nature of the business activity, to promote sound and sustainable environmental and social performance as well as lead to improved financial outcomes.</p>	<p>Section 2 of Chapter 1 of the NEMA, as amended, provides details of the environmental management principles that should be adhered to during the entire project life. Chapter 6 of the NEMA EIA Regulations, 2014 (as amended) outlines the requirements for Public Participation in respect of a project. This document represents the S&EIA process (equitable to an ESIA) undertaken for the proposed development, and comprehensively assesses the key environmental and social impacts and complies with the requirements of the NEMA EIA Regulations, 2014 (as amended). The proposed development will be managed in terms of environmental and social impacts through an approved EMPr which is drafted as part of the EIA process. The following have been included as part of this Assessment:</p> <ul style="list-style-type: none"> • Description of relevant Policy; • Identification of Risks and Impacts; • EMPr (included in the EIA phase); • Requirements for Monitoring and Review; • Stakeholder Engagement as part of PPP; • External Communication and Grievance Mechanism; and • Recommendation for ongoing Reporting to Affected Communities.
<p>Performance Standard 2: Labour and Working Conditions Objective: Recognizes that the pursuit of economic growth through employment creation and income generation should be balanced with protection of basic rights for workers.</p>	
<p>For any business, its workforce is a valuable asset and a sound worker-management relationship is a key component of the overall success of the enterprise. By protecting the basic rights of workers, treating workers fairly and providing them with safe and healthy working conditions, Borrowers can enhance the efficiency and productivity of their operations and strengthen worker commitment and retention.</p>	<p>Whilst PS 2 is applicable to the proposed development, it will not be addressed in detail in this report as Labour and Working conditions are typically addressed prior to construction, once EA has been awarded. Recommendations are provided concerning development of a detailed Human Resources (HR) and Occupational Health and Safety (OHS) system by the Applicant. In terms of the proposed development, construction will require the appointment of an EPC contractor (and others) for completion. Appointment of contactors and employees will be 'fair and equal', and workers will be provided with a safe, healthy and inclusive work environment. The EMPr will incorporate the requirements for compliance with local and international Labour and Working legislation and good practice on the part of the contractors.</p>
<p>Performance Standard 3: Resource Efficiency and Pollution Prevention</p>	

PS Description	Project Applicability
<p>Objective: Recognizes that increased industrial activity and urbanization often generate higher levels of air, water and land pollution, and that there are efficiency opportunities.</p>	
<p>Increased industrial activity and urbanization often generate increased levels of pollution to air, water and land that may threaten people and the environment at the local, regional and global level. Borrowers are required to integrate pollution prevention and control technologies and practices (as technically and financially feasible as well as cost-effective) into their business activities.</p>	<p>The Project is not likely to have many large-scale and long-term impacts related to pollution. Measures to address air, water and land pollution will be contained in the EMPr. There are no material resource efficiency issues associated with the proposed development and the EMPr will include general resource efficiency measures. The project is not greenhouse gas (GHG) emissions intensive and the detailed assessment and reporting of emissions is not required. This project, however, seeks to facilitate resource efficiency and pollution prevention by contributing to the South African green economy. The project will not release industrial effluents and waste generation will be managed according to the EMPr. Hazardous materials are not a key issue; small quantities of construction materials (oil, grease, diesel fuel etc.) are the only wastes expected to be associated with the project. Land contamination of the site from previous land use is not a concern as the project area is mostly an agricultural area where low intensity agriculture / grazing is practiced.</p>
<p>Performance Standard 4: Community Health, Safety, and Security</p>	
<p>Objective: Recognizes that projects can bring benefits to communities but can also increase potential exposure to risks and impacts from incidents, structural failures, and hazardous materials.</p>	
<p>Business activities can increase the potential for community exposure to risks and impacts arising from equipment accidents, structural failures and releases of hazardous materials as well as impacts on a community's natural resources, exposure to diseases and the use of security personnel. Borrowers are responsible for avoiding or minimizing the risks and impacts to community health, safety and security that may arise from their business activities.</p>	<p>The requirements for PS 4 have been addressed in this report and will be managed in accordance with the EMPr. It is understood that the project infrastructure and equipment will be designed to good industry standards to minimise risks to communities, however a community health and safety plan should be compiled by the Applicant prior to construction to meet the requirements of IFC Performance Standard 4 (Community Health, Safety and Security). To ensure compliance with PS 4, Applicant will need to evaluate the risks and impacts to the health and safety of the affected community during the design, construction and operation of the proposed development and establish preventive measures to address them in a manner commensurate with the identified risks and impacts as contained in this report. Such measures need to adhere to the precautionary principle for the prevention or avoidance of risks and impacts over minimization and reduction.</p>
<p>Performance Standard 5: Land Acquisition and Involuntary Resettlement</p>	
<p>Objective: Applies to physical or economic displacement resulting from land transactions such as expropriation or negotiated settlements.</p>	
<p>Land acquisition due to the business activities of a Borrowers may result in the physical displacement (relocation or loss of shelter)</p>	<p>Not Applicable</p>

PS Description	Project Applicability
<p>and economic displacement (loss of access to resources necessary for income generation or as means of livelihood) of individuals or communities. Involuntary resettlement occurs when affected individuals or communities do not have the right to refuse land acquisition and are displaced, which may result in long-term hardship and impoverishment as well as environmental damage and social stress. Borrowers are required to avoid physical or economic displacement or minimize impacts on displaced individuals or communities through appropriate measures such as fair compensation and improving livelihoods and living conditions.</p>	
<p>Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</p>	
<p>Objective: Promotes the protection of biodiversity and the sustainable management and use of natural resources.</p>	
<p>Protecting and conserving biodiversity (including genetic, species and ecosystem diversity) and its ability to change and evolve, is fundamental to sustainable development. Borrowers are required to avoid or mitigate threats to biodiversity arising from their business activities and to promote the use of renewable natural resources in their operations.</p>	<p>In terms of protecting and conserving biodiversity, specialists have assessed the impacts of the proposed development within the area of influence and will recommend further measures to prevent/avoid/mitigate these potential impacts during the EIA phase. Specialist methods include a combination of literature review, stakeholder engagement and consultation, and in-field surveys. This substantively complies with the PS 6 general requirements for scoping and baseline assessment for determination of biodiversity and ecosystem services issues. The determination of habitat sensitivity was undertaken within the legal and best practice reference framework for South Africa.</p>
<p>Performance Standard 7: Indigenous Peoples</p>	
<p>Objective: Aims to ensure that the development process fosters full respect for Indigenous Peoples.</p>	
<p>Indigenous Peoples are recognized as social groups with identities that are distinct from other groups in national societies and are often among the marginalized and vulnerable. Their economic, social and legal status may limit their capacity to defend their interests and rights to lands and natural and cultural resources. Borrowers are required to ensure that their business</p>	<p>Not Applicable. As per the international instruments under the United Nations (UN) Human Rights Conventions, no indigenous peoples are present within the study area. The Project does not involve displacement.</p>

PS Description	Project Applicability
<p>activities respect the identity, culture and natural resource-based livelihoods of Indigenous Peoples and reduce exposure to impoverishment and disease.</p>	
<p>Performance Standard 8: Cultural Heritage Objective: Aims to protect cultural heritage from adverse impacts of project activities and support its preservation.</p>	
<p>Aims to protect cultural heritage from adverse impacts of project activities and support its preservation.</p>	<p>A cultural heritage impact assessment and paleontological impact assessment has been undertaken for the proposed development (Section 10.8). Consultation will also be undertaken with the SAHRA.</p>

4. SCOPE OF WORK AND SCOPING METHODOLOGY PHASE

The EIA process formally commences with notifying the competent authority (in this case the DFFE) of the proposed development through the submission of an application form. The EAP, along with a team of technical specialists, commence the Scoping Phase, to inform decision regarding the appropriate “scope” of the EIA phase.

The existing environmental baseline of the site proposed for development is established during this phase through a desktop assessment and site visits. The type of development is considered and its anticipated impacts on the existing environment informs the specialists’ studies to be undertaken. The methodology of how these impacts should be assessed within the EIA phase is also determined.

4.1 DFFE ENVIRONMENTAL SCREENING TOOL

In terms of GN R960 (promulgated on 5 July 2019) and Regulation 16 (1)(b)(v) of the EIA Regulations, 2014 (as amended), the submission of a Screening Report generated from the national web based environmental screening tool is compulsory for the submission of BA and EIA applications in terms of Regulation 19 and 21 of EIA Regulations, 2014 (as amended). The Screening Report generated for the proposed development is included in Volume II of this Report.

The screening report was generated based on the selected classification, i.e., Infrastructure | Electricity | Generation | Renewable | Wind. No intersections with Environmental Management Frameworks (EMF) were found. In terms of development incentives, restrictions, exclusions or prohibitions, no intersections with any development zones were found.

Based on the selected classification to produce the screening tool report, and the environmental sensitivities of the development footprint, the screening report generates a list of specialist assessments identified for inclusion in the assessment report. It is the responsibility of the EAP to confirm this list and to motivate in the assessment report, the reason for not including any of the identified specialist study.

Table 4-1 provides a summary of the specialist assessments identified by the screening tool reports, and the response to each assessment in terms of the proposed development.

Specialist assessments undertaken (Volume II) have considered the results of the DFFE Screening Tool in their terms of reference.

TABLE 4-1: SPECIALIST ASSESSMENTS IDENTIFIED IN TERMS OF THE NATIONAL WEB-BASED SCREENING TOOL FOR THE PROPOSED EMVELO WEF

Identified Specialist Assessment	Assessment Protocol	Identified Sensitivity	
		By DFFE Screening Report	By Specialist / EAP
Agriculture Theme	Protocol for the Specialist Assessment and Minimum Report Content Requirements of Environmental Impacts on Agricultural Resources by Onshore Wind and/or Solar Photovoltaic Energy Generation Facilities where the Electricity Output is 20 MW or more, gazetted on 20 March 2020. This protocol replaces the requirements of Appendix 6 of the Environmental Impact Assessment Regulations.	Very High Sensitivity	High Sensitivity
	Comment: This site sensitivity verification verifies those parts of the site that are indicated as cropland as being of high agricultural sensitivity (or very high for irrigated cropland), and the rest of the site as being of medium agricultural sensitivity with a maximum land capability of 7.		
Aquatic Biodiversity Theme	Protocol for the Specialist Assessment and minimum report content requirements for Environmental Impacts on Aquatic Biodiversity, gazetted on 20 March 2020.	Very High Sensitivity	Very High Sensitivity
	Comment: Based on the DFFE Screening Tool, the WEF and Grid Connection falls within areas of very high sensitivity. The specialist agrees with the environmental sensitivities identified on site. However, disputes the exact extent of the systems, as the Screening Tool shows a catchment wide representation of the aquatic waterbodies that were rated as sensitive.		
Archaeological and Cultural Heritage Theme	Site Sensitivity Verification Requirements where a Specialist Assessment is required but no specific assessment protocol has been prescribed, gazetted on 20 March 2020.	Low Sensitivity	Low Sensitivity
	Comment: The screening report states that the affected area is of low significance. The specialist disagrees with this as there have been no previous surveys in the general area with which the screening tool can compare. The survey results indicate the area is of low, medium and high significance		

Identified Specialist Assessment	Assessment Protocol	Identified Sensitivity		
		By DFFE Screening Report	By Specialist / EAP	
BAT Impact Theme	Not Determined	High Sensitivity	High Sensitivity	
	<p>Comment: Based on current taxonomic information and field data, no threatened species were recorded or expected to occur on site. The acoustic monitoring results show that the median number of bat passes/hour per night at height (50 m and 90 m) would classify the PAOI as low sensitivity for Cape serotine and moderate to high sensitivity for Egyptian free-tailed bat depending on season. The outcome of the site sensitivity verification (SSV) is that the overall sensitivity of the site varies by bat species and season, linked to their relative activity levels. However, the two sensitivities are based on different data types. The Screening Tool is based on broad scale habitat data whereas the SSV is based on bat collision risk with wind turbines derived from activity data collected within the project boundary, and is therefore a better approximation of the project sensitivity because collision is the primary impact.</p>			
Landscape / Visual Theme	Site Sensitivity Verification Requirements where a Specialist Assessment is required but no specific assessment protocol has been prescribed, gazetted on 20 March 2020.	Very High Sensitivity	Medium Sensitivity	
	<p>Comment: According to specialist report, the study area landscape is defined to be moderate to low due to the varied landscape.</p>			
Plant Theme	Species	Protocol for specialist assessment and minimum report content requirements for Environmental Impacts on Terrestrial Plant Species, gazetted on 20 March 2020.	Medium Sensitivity	Medium Sensitivity
	<p>Comment: The Screening Tool indicated that the Plant Theme Sensitivity as being of medium sensitivity. However, the very nature of the original vegetation in this area (Moist Sandy Highveld Grassland) is low growing and visually uniform, which does not provide much visual screening. Although the grassland vegetation is not overly sensitive to the development it does not assist in reducing the visual expose of the turbines.</p>			
Avian Theme	Impact	Protocol for the specialist assessment and minimum report content requirements for the Environmental Impact Assessment Regulations. 2014 (GNR 326, 7 April 2017) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA).	High Sensitivity	High Sensitivity

Identified Specialist Assessment	Assessment Protocol	Identified Sensitivity	
		By DFFE Screening Report	By Specialist / EAP
	<p>Comment: A High sensitivity classification for the WEF Project Site and the Grid Connection PAOI was confirmed during the on-site surveys. Several species of conservation concern were recorded on site with conservation status ranging from Vulnerable to Endangered.</p>		
Civil Aviation Theme	<p>Protocol for the specialist assessment and minimum report content requirements for Environmental Impacts on Civil Aviation Installations, gazetted on 20 March 2020.</p> <p>Comment: The Screening Tool Report indicated that there are Civil Aviation Installations within 5km of the proposed development. As such, the Civil Aviation Theme is allocated a High Sensitivity rating. The Civil Aviation Authority has requested that the Project Proponent applies or Obstacle approval by following the process outlined in their website. This will be done as required prior to the commencement of construction activities.</p>	Medium Sensitivity	Medium Sensitivity
Defence Theme	<p>Protocol for the specialist assessment and minimum report content requirements for Environmental Impacts on Defence Installations, gazetted on 20 March 2020.</p> <p>Comment: Site verification confirms the low sensitivity. During the public consultation, the South African National Defence Force (SANDF) will be consulted by the EAP / Project Applicant to confirm that there will be no impact on the defence installation of the development area and immediate surrounds. A site sensitivity verification report will be produced by the EAP for inclusion as part of the EIA process.</p>	Low Sensitivity	Low Sensitivity
Animal Theme	<p>Species</p> <p>Protocol for specialist assessment and minimum report content requirements for Environmental Impacts on Terrestrial Animal Species, gazetted on 20 March 2020.</p> <p>Comment: The screening tool indicated "High" sensitivity for the two faunal SCC species. Considering the known habitat preferences for the two SCC species, it is the opinion of the specialists that the project area ranges from Low to High sensitivity; several areas representative of important habitat are considered High sensitivity and should ideally be excluded within the development footprint, and/or a process of micro-siting would be required if development occurs in these areas. The</p>	High Sensitivity	High Sensitivity

Identified Specialist Assessment	Assessment Protocol	Identified Sensitivity	
		By DFFE Screening Report	By Specialist / EAP
	nature of the site and its suitability as habitat for the two species is discussed in the remainder of the report. The High sensitive areas are indicated on a constraints map.		
Noise Theme	Protocol for specialist assessment and minimum report content requirements for Noise Impacts, gazetted on 20 March 2020. Comment: There are permanent or temporary residential activities, and these locations are located within 2,000m from the area where wind turbines may be developed. These residential activities are considered to be noise-sensitive and the areas are considered to have a "Very High" sensitivity to noise.	Very High Sensitivity	Very High Sensitivity
Flicker Theme	Site Sensitivity Verification requirements where a specialist assessment is required but no Specific Assessment Protocol has been prescribed, gazetted 20 March 2020. Comment: No flicker assessment has been / will be undertaken for the scoping phase. The outcome of the noise assessment / visual study will assist the EAP in the flicker assessment during the EIA phase of the development.	Very High Sensitivity	Not Determined
Traffic Theme	Site Sensitivity Verification Requirements where a Specialist Assessment is required but no specific assessment protocol has been prescribed, gazetted on 20 March 2020. Comment: Traffic assessment was identified as a required specialist assessment, but no environmental sensitivity was determined by the screening report. A desk-based traffic assessment was undertaken for the proposed development. A site visit will be undertaken for the EIA phase.	Not Determined	Not Determined
Geotechnical Theme	Site Sensitivity Verification Requirements where a Specialist Assessment is required but no specific assessment protocol has been prescribed, gazetted on 20 March 2020. Comment: Geotechnical assessment was identified as a required specialist assessment, but no environmental sensitivity was determined by the screening report. The EAP is of the opinion that a Geotechnical Assessment for the development can	Not Determined	Not Determined

Identified Specialist Assessment	Assessment Protocol	Identified Sensitivity	
		By DFFE Screening Report	By Specialist / EAP
	and will only be undertaken prior to the commencement of the construction phase. The EAP has not included this assessment as part of the application process.		
Terrestrial Biodiversity Theme	Protocol for the Specialist Assessment and minimum report content requirements for Environmental Impacts on Terrestrial Biodiversity, gazetted on 20 March 2020.	Very High Sensitivity	Medium Sensitivity
	<p>Comment: Preferred areas would be low aquatic and/or terrestrial sensitivity areas, followed by moderate sensitivity areas (where strategic footprints would need to follow a clear mitigation process and rationale.</p>		
Paleontology Theme	Site Sensitivity Verification Requirements where a Specialist Assessment is required but no specific assessment protocol has been prescribed, gazetted on 20 March 2020.	Very High Sensitivity	Very High Sensitivity
	<p>Comment: The area is of very high paleontological sensitivity. Dr Alan Smith undertook a desktop Paleontological Impact Assessment (PIA) for the proposed Emvelo WEF. While the paleontology is of very high sensitivity as it forms part of the Vryheid formation, very few significant vertebrate fossils have been found in it.</p>		
RFI (Radio Frequency Interference) Theme	Site Sensitivity Verification Requirements where a Specialist Assessment is required but no specific assessment protocol has been prescribed, gazetted on 20 March 2020.	Very High Sensitivity	Not Determined
	<p>Comment: The screening tool described the study area as very high Radio Frequency Interference Theme (RFI) sensitivity. The South African Radio Astronomy Observatory (SARAO) will be included as a registered I&AP as part of the EIA process. During the public consultation of the proposed development the network operators will be consulted to determine if the closest proposed turbine will be within range which will affect the distribution from the radar stations.</p>		
Socio-Economic Theme	Site Sensitivity Verification Requirements where a Specialist Assessment is required but no specific assessment protocol has been prescribed, gazetted on 20 March 2020.	Not Determined	Not Determined
	<p>Comment:</p>		

Identified Specialist Assessment	Assessment Protocol	Identified Sensitivity	
		By DFFE Screening Report	By Specialist / EAP
	Socio-economic assessment was identified as a required specialist assessment, but no environmental sensitivity was determined by the screening report. Following the scoping assessment and verification, it is recommended that a full Social Impact Assessment be undertaken by a social specialist.		

4.2 SPECIALIST SCOPING METHODOLOGY

To evaluate the potential preliminary environmental impacts and verify the sensitivity of the screening report, information relating to the existing environmental conditions was collected through field and desktop research, this is known as the baseline.

Each of the specialist assessments followed a systematic approach to the assessment of impacts, with the key steps being:

- Description of existing environment/baseline conditions;
- Site Sensitivity Verification;
- Prediction of likely potential impacts, including cumulative impacts (both positive and negative), where relevant;
- Plan of Study for the EIA Phase, and
- Summary of findings and recommendations.

The methodology each specialist used to collate their report is summarised below and is available in each Specialist Report attached to this Report as Volume II.

4.2.1 SOILS AND AGRICULTURAL POTENTIAL

The assessment was based on a verification of current agricultural land use on the site and was informed by existing climate, soil, and agricultural potential data for the site. The level of agricultural assessment is considered entirely adequate for an understanding of on-site agricultural production potential for the purposes of this assessment.

For this purpose, only an understanding of the general range and distribution patterns of different soil conditions across the site is required. A more detailed soil survey would be extremely time-consuming and impractical to conduct, given the very large assessment area, and would not provide any additional data that would add value to the assessment of the agricultural impact of the WEF. This is because a wind farm extends over a very large surface area.

The layout design of a wind farm is complex and there are multiple interacting factors that determine the turbine locations that will ensure the viability of the wind farm. Each turbine influences the amount of wind that the other turbines receive. Therefore, the location of one turbine cannot simply be shifted without requiring other turbines to be shifted as well, to retain the viability of all the turbines. To shift turbines to account for variation in soil conditions would be extremely complex and would require a level of soil mapping detail across the whole wind farm area that would be practically impossible to achieve.

4.2.2 FRESHWATER AND WETLANDS (AQUATICS)

The aquatic study followed the approaches of several national guidelines with regards to wetland assessment. These assessments were modified by the author, to provide a relevant mechanism of assessing the present state of the study systems, applicable to the specific environment and in a clear and objective manner, assess the potential impacts associated with the proposed development site based on information collected within the relevant farm portions of a number of years for this and other proposed projects.

Current water resource classification systems make use of the Hydrogeomorphic (HGM) approach, and for this reason, the National Wetland Classification System (NWCS) approach was used in the study. It is also important to understand wetland definition, means of assessing wetland conservation and importance as well as understanding the pertinent legislation with regards to protecting wetlands.

4.2.3 TERRESTRIAL BIODIVERSITY (FLORA AND FAUNA)

The terrestrial biodiversity assessment and report is based on a comprehensive desktop study to identify potential risks to terrestrial biodiversity inclusive of the DFFE National Environmental Screening Tool, relevant regional biodiversity planning frameworks, any previous studies as well as interrogation of applicable databases.

The methodology used for the Faunal Assessment, including a background desktop study and site visit is outlined in the subsections below:

- Distributional records for the invertebrate Species of Conservation Concern (SCC) were extracted from digitized databases of several South African museums (e.g., Iziko Museum of South Africa, Ditsong National Museum of Natural History, South African National Collections of Insects);
- For both faunal SCC, online resources, such as the IUCN Red List of Threatened Species (<https://www.iucnredlist.org/>), the Orthoptera Species File Online (<http://orthoptera.speciesfile.org/HomePage/Orthoptera/HomePage.aspx>), and iNaturalist (<https://www.inaturalist.org/>) were also consulted for information on geographic distributions and habitat requirements;
- Published information on the two faunal SCC were investigated to further assess their distribution range, ecology, habitat, and any life history requirements;
- Ecosystem-level data and broad-scale habitat was assessed using the following resources:
 - Vegetation Map of South Africa (SANBI, 2018; Skowno et al., 2019);
 - Mpumalanga Biodiversity Sector Plan (MBSP) terrestrial assessment (MTPA, 2014a, 2014b; Lötter, 2015);
 - Ecosystem Threat Status and Protection level of South Africa's ecosystems (Skowno et al., 2019; South African National Biodiversity Institute and Department of Forestry, 2021);
 - Land cover based habitat modification (Skowno, 2020); and
 - South Africa's Important Bird Areas (IBA) (Marnewick et al., 2015): IBAs are selected using the presence of globally threatened species, groups of species with a restricted range (<50 000 km²), species assemblages confined to a single biome, and congregations of one or more species.

This study is primarily desktop based and relies on most recent available information including literature, online and other databases and aerial photography as well as a limited time site visit, in the late mid-autumn and mid-winter season.

4.2.4 AVIFAUNA

The following methods and sources were used to compile the avifauna specialist scoping phase report:

- Bird distribution data of the Southern African Bird Atlas Project (SABAP2) was obtained from the University of Cape Town (<https://sabap2.birdmap.africa/>), to ascertain which species occur within the Broader Area i.e. within a block consisting of 12 pentads (Table 4-2, Figure 4-1: Project Location within Broader Area of 12 SABAP2 Pentads). A pentad grid cell covers 5 minutes of latitude by 5 minutes of longitude (5'× 5'). Each pentad is approximately 8 × 9 km. From 2007 to date, a total of 179 full protocol lists (i.e., surveys lasting a minimum of two hours each) have been completed for this area. In addition, 218 ad hoc protocol lists (i.e., surveys lasting less than two hours but still yielding valuable data) have been completed.
- The national threatened status of all priority species was determined with the use of the most recent edition of the Red Data Book of Birds of South Africa (Taylor *et al.* 2015), and the latest authoritative summary of southern African bird biology (Hockey *et al.* 2005).
- The global threatened status of all priority species was determined by consulting the (2022.2) IUCN Red List of Threatened Species (<http://www.iucnredlist.org/>).
- A classification of the vegetation in the WEF application site was obtained from the Atlas of Southern African Birds 1 (SABAP 1) (Harrison *et al.* 1997) and the National Vegetation Map (2012 beta2) from the South African National Biodiversity Institute website (Mucina & Rutherford 2006 & <http://bgisviewer.sanbi.org>).
- The Important Bird Areas of Southern Africa (Marnewick *et al.* 2015) was consulted for information on potentially relevant Important Bird Areas (IBAs).
- Satellite imagery (Google Earth ©2023) was used in order to view the Broader Area on a landscape level and to help identify sensitive bird habitat.
- Priority species for wind energy developments were identified from the most recent (November 2014) list of priority species for wind farms compiled for the Avian Wind Farm Sensitivity Map (Retief *et al.* 2012).
- The South African National Biodiversity BGIS map viewer was used to determine the locality of the proposed site relative to National Protected Areas.
- The DFFE National Screening Tool was used to determine the assigned avian sensitivity of the WEF and Grid application site.
- The primary source of information on avifaunal diversity, abundance and flight patterns at the site were the results of a pre-construction programme conducted over four seasons (2022–2023) at the proposed Mulilo WEF Cluster (Emvelo WEF, Rochdale WEF and Sheepmoor WEF application sites). The primary methods of data capturing were walk transect counts, drive transect counts, focal point monitoring, vantage point counts and incidental sightings. Note: Additional species specific focussed surveys and investigation are on going and will be completed during the EIA phase of the process.
- Information gained from pre-construction monitoring at four potential wind farm sites in close proximity to the current site, namely Ujekamanzi WEFs 1–2 and Camden WEFs 1–

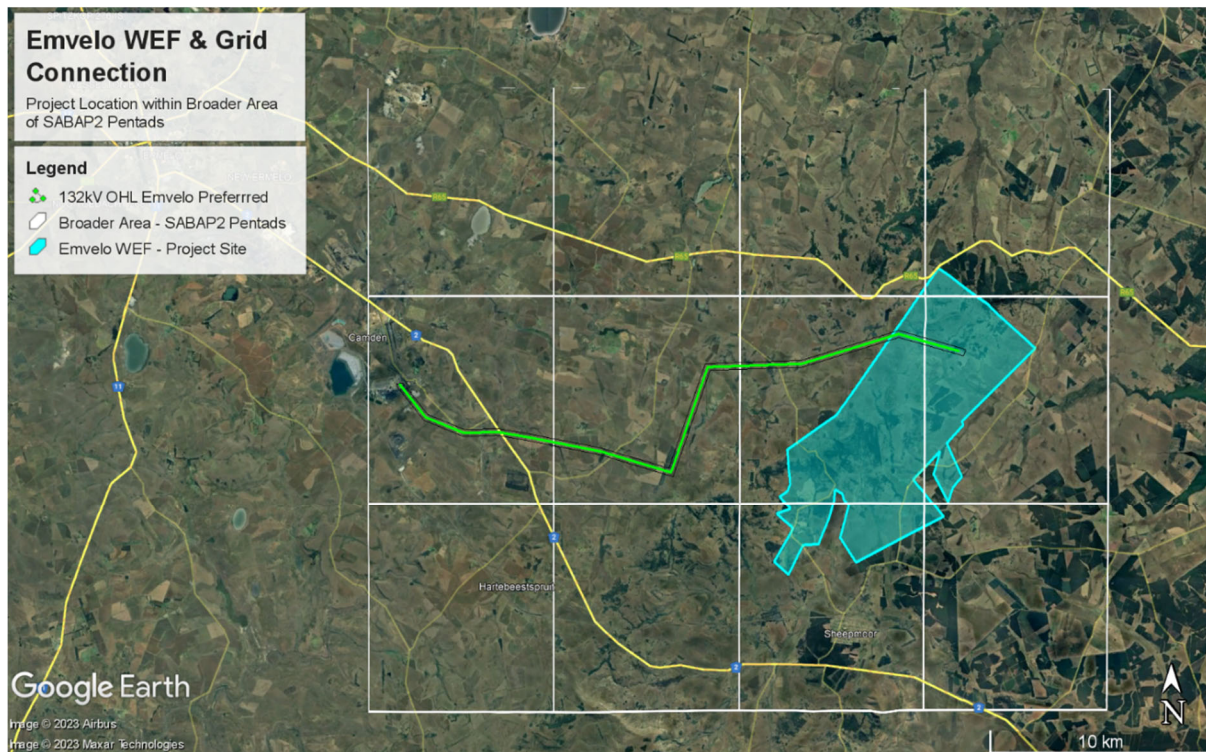
2 also assisted in providing a comprehensive picture of avifaunal abundance and diversity in the greater area, including the current study area.

TABLE 4-2: THE NUMBER OF SABAP2 LISTS COMPLETED FOR THE BROADER AREA

Pentad	Full protocol lists	Ad hoc protocol lists
2630_3005	22	11
2630_3010	17	15
2630_3015	10	17
2630_3020	5	10
2635_3005	23	44
2635_3010	13	5
2635_3015	23	8
2635_3020	15	1
2640_3005	26	14
2640_3010	6	32
2640_3015	15	36
2640_3020	4	25
Total	179	218

Source:

FIGURE 4-1: PROJECT LOCATION WITHIN BROADER AREA OF 12 SABAP2 PENTADS



4.2.5 BATS

The Project Area of Influence (PAOI) was defined as the Area of Interest (AoI) of the development cluster plus a 10 km buffer given that bats are flying mammals (Scottish Natural Heritage 2019). This area was studied at a desktop level to determine which bat species (i.e., impact receptors) are likely to occur within the PAOI, to provide information on their natural history and conservation status, and to contextualise the project site within the larger social-ecological environment with respect to bats.

Bats were also studied through 12 months of field surveys in the AoI which began on 26th April 2022 and ended on 13th May 2023. Monitoring is continuing at two locations until November 2023 and these additional data will be incorporated into the final EIA reporting for the proposed development. Bat activity was sampled at 10 locations within the AoI with Wildlife Acoustics, Inc. SM4 bat detectors.

At eight locations (AM4 – AM11), SMM-U2 microphones were positioned at the top of a 10 m aluminium mast. At the remaining two locations (AM1 and AM3), microphones were positioned on meteorological towers at 10 m, 50 m, and 90 m respectively.

Sampling took place nightly, from 30 minutes before sunset to 30 minutes after sunrise, and the study summarises 383 nights of bat activity data. This monitoring period therefore spans of all four seasons providing a representative account of temporal bat activity patterns across a year. Acoustic data retrieved from each bat detector were processed using Kaleidoscope® Pro (Version 5.4.2, Wildlife Acoustics, Inc.). Bats were automatically identified using the embedded "Bats of South Africa Version 5.4.0" reference library and verified by inspecting echolocation files. The number of acoustic files recorded was used

as a measure to quantify bat activity, whereby each file was considered one bat pass of the microphone.

Roost surveys were also undertaken which entailed discussions with landowners to locate any known roosts or potential roosts with evidence of bats. In addition, buildings at farmsteads within the PAOI, as well as accessible rocky outcrops/crevices, were systematically surveyed during field visits in November 2022 (spring), and January 2023 (summer). The surveys aimed to directly observe roosting bats, locate evidence of roosting bats (e.g., culled insect remains, fur-oil-stained exit and entry points, guano/droppings), and assess the likelihood for each potential roost to support bats.

4.2.6 NOISE

This assessment was based on a desktop study as well as ambient noise level data collected during the site visit that was undertaken in June 2023, and was assessed in terms of the Noise Sensitivity Theme using the National Web-based Environmental Screening Tool. Basic predictive models were also used to identify potential issues of concern. Wind turbines do emit noises at sufficient levels to propagate over large distances and the assessment indicates the potential noise impact on the closest receptors.

The data indicate ambient sound levels are generally low, with faunal and other natural sounds as the main source of noise in the area. Wind-induced noises influence ambient sound levels during periods with increased winds, with the ambient sound levels determined by numerous factors (vegetation type and density, faunal species in the area, etc.). The low ambient sound level was confirmed during a site visit conducted from the 7th to 9th June 2023 during periods with low winds, with data to be processed and included in the recommended Noise Impact Assessment Report for the EIA Phase. The ambient sound levels were measured in terms of Government Notice Regulation 20 of March 2020.

4.2.7 HERITAGE, ARCHAEOLOGY AND PALAEOLOGY

The method for Heritage assessment consists of several steps. The scoping assessment relied on a desktop assessment as well as a preliminary site visit to get an understanding of the features of heritage and paleontological significance in the area. The Impact Assessment phase, however, will include a more detailed field assessment.

An existing database held by the specialist was used to assess the potential presence of sites of heritage, archaeological and paleontological significance. The database includes information from several provinces, most of the national and provincial monuments and battlefields in Southern Africa (<http://www.vuvuzela.com/googleearth/monuments.html>) and cemeteries in southern Africa (information supplied by the Genealogical Society of Southern Africa). The database is in Google Earth format and thus used as a quick reference when undertaking desktop studies.

Where available, 1st and 2nd edition 1:50 000 topographical and 1937 aerial photographs are also assessed, to assist in general location and dating of buildings and/or graves.

Where required historical architects, paleontologists, and historians are also consulted where necessary.

4.2.8 VISUAL / LANDSCAPE

A field survey was undertaken on the 31st May and 13th June 2023. The method used for the study was both desk based (using Google Earth) and a site inspection. Google Earth, the Surveyor General, SANBI, the South African protected and Conservation Areas Database – DFFE, and Environment Geographic Information Systems were used to identify homesteads and structures that may be visually impacted. This information was referenced during the site inspection. The field study entailed travelling along public roads that surrounded and crossed the study area to determine the potential visibility from these areas.

The physical characteristics of the project components were described and illustrated based on information supplied by the EAP. Thereafter, the landscape's character was described and rated in terms of its aesthetic appeal using recognised contemporary research in perceptual psychology as the basis, and its sensitivity as a landscape receptor.

The sense of place of the study area was described as to its uniqueness and distinctiveness. The primary informant of these qualities was the spatial form and character of the natural landscape together with the cultural transformations associated with the historical/current use of the land. Additionally, visibility of the proposed Project was determined using on-site observations and a viewshed assessment.

Lastly, illustrations, in basic simulations, of the proposed WEF and the proposed 132kV powerlines were overlaid onto panoramas of the landscape, as seen from nearby sensitive viewing points, to give the reviewer an idea of the scale and location of the proposed Project within its landscape context. Visual intrusion (contrast) of the proposed Project was determined by simulating its physical appearance from these sensitive viewing areas. The severity and significance of the visual impact of Emvelo WEF were rated based on the method described above and measures to mitigate the negative impacts of Emvelo WEF were recommended.

4.2.9 SOCIO-ECONOMICS

The approach to the Scoping Level Social Impact Assessment (SIA) study is based on the Western Cape Department of Environmental Affairs and Development Planning Guidelines for SIA (February 2007). These guidelines are based on IBP.

The Social Impact Assessment methodology included the:

- Review of socio-economic data for the study area;
- Review of relevant planning and policy frameworks for the area;
- Review of information from similar studies, including the SIAs undertaken for other renewable energy projects in the study area;
- Site visit; and
- Identification and assessment of the social issues associated with the proposed project.

Interviews with key stakeholders and I&APs will be undertaken during the assessment phase.

4.2.10 TRAFFIC AND TRANSPORTATION

A desktop study and site visit were conducted to understand the existing receiving environment of the proposed Project site. The site was then evaluated based on its advantages and disadvantages in terms of traffic and transportation, particularly relative to available access and infrastructure of the existing road network.

The potential traffic and transport related impacts were then identified for future assessment and the data collection and consultation requirements for the full Impact Assessment were determined. This information can be used as input into the wider scoping assessment and evaluation of the sites from the perspective of other disciplines, for the selection of the final site.

5. DESCRIPTION OF THE BASELINE ENVIRONMENT

To evaluate the potential E&S impacts, information relating to the existing environmental conditions or baseline environment is collected through field and desktop research. The baseline environment also extends into the future, although predictions of any changes can involve a high number of variables and may be subject to potentially large uncertainties. As a result, in most cases, the baseline is assumed to remain unchanged throughout the operation of the development. Where this is not the case, this is stated.

The baseline environment has been used to identify any potential sensitive receptors on and near the site, and it is used to assess what changes may take place during the construction, operation and decommissioning phases of the development and the effects, if any, that these changes may have on these receptors.

Within each technical assessment, data is collected from public records and other archive sources and where appropriate, extensive field surveys are carried out. The timing/seasonality of the work within the study area is also outlined within each assessment where applicable.

5.1 REGIONAL AND LOCAL CONTEXT

The study area is located within the Msukaligwa Municipality (MM) within the Mpumalanga Province. The MM is one of the seven Local Municipalities that make up the Gert Sibande District Municipality (GSDM).

The MM is a Category B municipality, established in 2001 following the completion of the demarcation process and first democratic local government election in 2000.

It is one of the seven local municipalities in Gert Sibande District Municipality. It was an amalgamation of the erstwhile Ermelo Transitional Council (TLC), Breyten TLC, Chressiemeer Transitional Rural Council (TRC), Lothair TRC, Davel TRC and Sheepmoor TRC.

5.2 TOPOGRAPHY AND TERRAIN

The lower lying areas of the site and surrounding area fall within a gently to moderately undulating plains supporting short dense grassland (Eastern Highveld Grassland) dominated by the usual highveld grass composition, with small, scattered rocky outcrops with wiry, sour grasses and some woody species. Several herbs and forbs are also common to the unit. The area has high levels of transformation, primarily agriculture and mining (coal) with small wetlands, narrow stream alluvia and pans.

The above plains are interspersed with a mountainous escarpment just north of Sheepmoor to the south-east, west and east, comprised of low mountains and undulating plains with the vegetation comprising predominantly short montane grasslands (Wakkerstroom Montane Grassland) on the plateaus and the relatively flat areas, with short forest and Leucosidea thickets occurring along steep, mainly east-facing slopes and drainage areas. Leucosidea sericea is the dominant woody-pioneer species that invades areas because of grazing mismanagement. Acacia (wattle) and Eucalyptus thickets are also prevalent as well as commercial forestry across the units.

5.2.1 LANDSCAPE OF THE PROJECT AREA OF INFLUENCE

The Project Area of Influence (PAOI) is situated in the Grassland Biome and comprises predominantly Eastern Highveld Grassland vegetation. The landscape associated with this

vegetation consists of slight to moderately undulating plains with small scattered rocky outcrops. The vegetation is short, dense grassland (Mucina and Rutherford 2006). Wakkerstroom Montane Grassland occurs in the middle of the PAOI, on low mountains and undulating plains.

Here the vegetation comprises short montane grassland on plateaus and flat areas. On steep, east facing slopes and in drainage areas, short forest and thicket occurs. Both vegetation types are endemic, and Eastern Highveld Grassland is classified as Vulnerable while Wakkerstroom Montane Grassland is classified as Least Concern (SANBI 2018). The PAOI includes some low hills and wetland depressions and has largely been transformed by cultivation in the west, commercial forestry in the east and urban sprawl, including extensive areas of alien invasive trees. The PAOI is in a summer rainfall region and has a cool-temperate climate with dry winters, frequent occurrence of frost and large differences in both diurnal and seasonal temperature extremes (Mucina and Rutherford 2006).

Critical Biodiversity Areas (CBA), areas of high biodiversity value that must be maintained in a natural state, are located throughout the PAOI, classified as either "CBA Irreplaceable" and "CBA Optimal". The former category comprises:

- Areas required to meet conservation targets and those with irreplaceability values greater than 80 %;
- Areas which represent critical linkages or pinch-points in the landscape that must remain natural, and; and
- Critically Endangered ecosystems (MTPA 2014).

The latter category comprises areas that are not 'irreplaceable', but they are the most optimal land configuration to meet all biodiversity targets. Ecological Support Areas (ESA), not essential for meeting biodiversity targets but important in supporting the functioning of CBAs and delivering important ecosystem services, are also located throughout the PAOI.

The south of the PAOI falls within a National Protected Areas Expansion Strategy (NPAES) Focus area (Moist Escarpment Grasslands), targeted for protected area expansion for improved ecosystem representation, ecological sustainability and resilience to climate change. Chrissiesmeer Protected Environment and Jericho Dam Nature Reserve overlap the north and east of the PAOI respectively.

5.3 CLIMATE CONDITIONS

Msukaligwa Municipality falls under the central Mpumalanga climatic zone characterized by warm, rainy summers and dry winters with sharp frosts. Rainstorms are often violent (up to 80 mm per day) with severe lightning and strong winds, sometimes accompanied by hail. The winter months are droughty with the combined rainfall in June, July and August making up only 3.9% of the annual total (734 mm). The average daily maximum temperature in January (the hottest month) is 25.2°C and in July (the coldest month) is 16.7°C. Due to its position near the escarpment, the area is somewhat windier than is typical for the South - Eastern Mpumalanga Highveld, although the majority of winds are still light, and their direction is controlled by topography.

Table 5-1 below indicates the climatic conditions of the proposed Emvelo Wind Energy Facility.

TABLE 5-1: CLIMATIC CONDITIONS OF THE PROPOSED EMVELO WEF

	Parameter	Value
Climate	Köppen-Geiger climate description (Beck et al, 2018)	Temperate, dry winter, hot summer
	Mean Annual Rainfall (mm) (Schulze, 2009)	667
	Reference Crop Evaporation Annual Total (mm) (Schulze, 2009)	1,207
	Climate capability classification (out of 9) (DAFF, 2017)	6 (moderate-high)

5.4 GEOLOGY

Msukaligwa Local Municipality is underlain predominantly by arenite and dolerite intrusions of the Karoo Supergroup. Other underlying rock types include quartz monzonite, granite and basalt. The central-western part of the study area is underlain by the Ermelo coal field, where the predominant rocks are sedimentary, i.e., sandstones, shales and siltstones of the Ecca Group that contains erinaceous strata of the coal-bearing Vryheid formation.

5.5 SOILS AND AGRICULTURAL POTENTIAL

The site falls within an area that is classified as a Protected Agricultural Area. A Protected Agricultural Area is a demarcated area in which the climate, terrain, and soil are generally conducive for agricultural production and which, historically, has made important contributions to the production of the various crops that are grown across South Africa. Within Protected Agricultural Areas, the protection, particularly of arable land, is considered a priority for the protection of food security in South Africa. However, there may be much variation within a Protected Agricultural Area and all land within it is not necessarily of sufficient agricultural potential to be suitable for crop production, due to site-specific terrain, soil, and other constraints. All land within a Protected Agricultural Area is therefore not necessarily worthy of prioritised protection as agricultural production land.

5.6 NOISE

Ambient sound levels were measured over a 2-night period from 7 to 9 June 2023 at six locations in the vicinity of the WEF, resulting in more than 900 daytime and 500 night-time measurements. Each measurement was collected over a 10-minute period and included a number of sound level descriptors, including; equivalent values, minimum and maximum levels, statistical sound levels as well as spectral information. Confidence levels in the resulting data are high and it is expected that the ambient sound level data would be applicable of other locations in the area.

Bird communication noises were significant and generally dominant, with some sounds from domestic animals (dogs, cows, sheep and chickens) audible at times.

Considering the average fast-weighted sound level data collected in the area:

- daytime fast-weighted sound levels ranged from 24 to more than 70 dBA, with average daytime sound levels being 43.3 dBA. This is typical of a rural noise district and considering the developmental character, a rating level of 45 dBA (typical of a rural noise district) will be assumed for the daytime period; and
- night-time fast-weighted sound levels ranged from 21 to more than 58 dBA, with average night-time sound levels being 37.3 dBA. This is typical of a rural to suburban noise district, with a typical rating level of 35 dBA.

5.7 FRESHWATER AND WETLANDS (AQUATICS)

The baseline description was a summer and winter survey of the study area that spanned a total of two weeks and conducted in February / March 2022 (late summer) and a site-specific assessment in April (Autumn) & September (Later winter) 2023.

The study area was dominated by a variety of aquatic features associated with catchments and rivers, characterised as follows:

- Mainstem Rivers: Floodplain dominated systems with floodplain wetlands (Figure 5-4). A few reaches did contain very narrow riparian zones, consisting mostly of a single row of willow trees associated with the Vaal River
- Valley Bottom Wetlands (Channelled and Unchannelled) (Figure 5-5)
- Endorheic pans (Figure 5-6)
- Seep wetlands (Figure 5-7)

The proposed Wind Energy Facility (WEF) is located in the Inkomati-Usuthu Water Management Area, within the upper catchment of the Usuthu River (SQ W54A) and Mpama Rivers (SQ W53B), while the proposed grid connection options are located in the Upper Vaal River (SQ C11A & C11B) in the Vaal Water Management Area (Figure 5-1). Thus, several permanent rivers and a variety of wetland hydrogeomorphic types are anticipated both associated with the riverine valleys and bench or plateau areas located between river valleys on higher lying areas (Figure 5-2).

The study region is further characterised by several National Biodiversity Assessment (2018) Wetland Clusters, National Freshwater Ecosystem Area (NFEPAs) and Strategic Water Resources Areas (Figure 5-3)

The geology is mostly shales or sandstone of the Vryheid Group, with several intrusions associated with dolerite sills and dykes in areas associated with the Karoo Supergroup. This typically allows for the development of riverine areas, some with floodplains, interspersed by the rocky inselbergs and small ridges and or bench / plateaus observed.

Overall, these catchment and subsequent rivers / watercourses and wetlands range from a Largely Natural to transformed states. Current impacts occur in localised areas and included the following:

- Mining
- Large scale farming
- Forestry
- Erosion due small road crossings and tracks;
- Grazing; and
- Small to large river impoundments, and off channel farm dams.

In terms of the National Freshwater Ecosystems Priority Areas (NFEPA) assessment, all the watercourses within the site have been assigned a condition score of C (Nel et al. 2011), indicating that they are Moderately Modified, but still have biological significance, while the NBA (2018) data indicated that most mainstem system near the WEF, had a River Conservation Score of B (Usuthu) and B on the Vaal River. These scores were substantiated by observations made in the field within the study area, and due to the impacts or disturbance observed these scores would be upheld. The final EIA report will be supplied with more detailed analysis of the respective systems once the proposed layout has been refined, as there are just too many systems to assess individually at this stage.

Any ratings will the also be substantiated with an assessment of the study area catchments linked to Critical Biodiversity Areas (CBA) and Ecological Support Areas, as shown in the Mpumalanga CBA spatial data.

The National Freshwater Ecosystems Priority Areas (NFEPA) (Nel *et al.*, 2011), also earmarked sub-quaternaries, based either on the presence of important biota (e.g. rare or endemic fish species) or conversely the degree of riverine degradation, i.e. the greater the catchment degradation the lower the priority to conserve the catchment. The important catchments areas are then classified as Freshwater Ecosystems Priority Areas (FEPAs). The study area falls within several FEPA and Upstream FEPA catchments associated with the Usuthu & Vaal river systems. This is large due to the presence of several important fish and aquatic invertebrate habitats that as well as the provision and maintenance of flows within the lower catchments.

Notably the following fish are commonly found in the study areas systems (Freshwater Biodiversity Information System - FBIS):

Fish Taxon	Conservation status
Enteromius anoplus (Weber, 1897)	Least concern
Enteromius pallidus (Smith, 1841)	Least concern
Enteromius paludinosus (Peters, 1852)	Least concern
Pseudocrenilabrus philander (Weber, 1897)	Least concern

The FBIS site data from 44 sites (<https://freshwaterbiodiversity.org/map/#search//taxon=&search=&siteId=&collector=&category=&yearFrom=&yearTo=&months=&boundary=&userBoundary=&>) spanning the study area also indicated a total of 200 aquatic invertebrate species, none currently listed as conservation needy as well as the following aquatic plants that were confirmed in this assessment

Plant Taxon	Conservation Status
<i>Agrostis continuata Stapf</i>	Not evaluated
<i>Andropogon eucomus Nees</i>	Least concern
<i>Andropogon lacunosus J.G.Anderson</i>	Least concern

<i>Arundinella nepalensis</i> Trin.	Not evaluated
<i>Berula thunbergii</i> (DC.) H. Wolff	Least concern
<i>Brachiaria bovonei</i> (Chiov.) Robyns	Least concern
<i>Carex rhodesiaca</i> Nelmès	Least concern
<i>Chironia purpurascens</i> (E.Mey.) Benth. & Hook.fil.	Least concern
<i>Crinum bulbispermum</i> (Burm.f.) Milne-Redh. & Schweick.	Least concern
<i>Cyperus denudatus</i> L.f.	Least concern
<i>Cyperus macranthus</i> Boeckeler	Not evaluated
<i>Cyperus melanospermus</i> (Nees) Valck.Sur.	Not evaluated
<i>Cyperus nitidus</i> Lam.	Not evaluated
<i>Denekia capensis</i> Thunb.	Not evaluated
<i>Drosera collinsae</i> N.E.Br. ex BurtDavy	Least concern
<i>Echinochloa jubata</i> Stapf	Least concern
<i>Eleocharis dregeana</i> Steud.	Least concern
<i>Eleocharis limosa</i> (Schrad.) Schult.	Least concern
<i>Festuca caprina</i> Nees	Not evaluated
<i>Fimbristylis complanata</i> (Retz.) Link	Least concern
<i>Fuirena pubescens</i> (Poir.) Kunth	Least concern
<i>Geranium multisectum</i> N.E.Br.	Least concern
<i>Geranium wakkerstroomianum</i> R.Knuth	Least concern
<i>Gladiolus papilio</i> Hook.f.	Not evaluated
<i>Gunnera perpensa</i> L.	Least concern
<i>Hesperantha hygrophila</i> Hilliard & B.L.Burt	Least concern
<i>Isolepis costata</i> Hochst. ex A.Rich.	Not evaluated
<i>Juncus effusus</i> L.	Least concern
<i>Juncus oxycarpus</i> E.Mey. ex Kunth	Least concern
<i>Lagarosiphon muscoides</i> Harv.	Least concern
<i>Leersia hexandra</i> Sw.	Least concern
<i>Limosella major</i> Diels	Least concern
<i>Miscanthus junceus</i> (Stapf) Pilg.	Least concern
<i>Nymphoides thunbergiana</i> (Griseb.) Kuntze	Least concern
<i>Odontelytrum abyssinicum</i> Hack.	Least concern

<i>Ornithogalum flexuosum</i> (Thunb.) U.Müll.- Doblies & D.Müll.-Doblies	Not evaluated
<i>Pennisetum macrourum</i> Trin.	Least concern
<i>Persicaria decipiens</i> (R.Br.) K.L.Wilson	Least concern
<i>Persicaria madagascariensis</i> (Meisn.) S.Ortiz & Paiva	Not evaluated
<i>Pterygodium nigrescens</i> (Sond.) Schltr.	Least concern
<i>Ranunculus multifidus</i> Forssk.	Least concern
<i>Rhynchospora brownii</i> Roem. & Schult.	Least concern
<i>Rorippa nudiuscula</i> (E.Mey. ex Sond.) Thell.	Least concern
<i>Sacciolepis typhura</i> (Stapf) Stapf	Least concern
<i>Schoenoplectus muriculatus</i> (Kük.) Browning	Not evaluated
<i>Schoenoplectus paludicola</i> (Kunth) J.Raynal, 1976	Least concern
<i>Typha capensis</i> (Rohrb.) N.E.Br.	Not evaluated
<i>Veronica anagallis-aquatica</i> L.	Not evaluated
<i>Xyris gerrardii</i> N.E.Br.	Least concern

FIGURE 5-1 PROJECT LOCALITY MAP INDICATING THE VARIOUS QUATERNARY CATCHMENT BOUNDARIES (ORANGE DOTTED LINES) IN RELATION TO THE STUDY AREA (SOURCE DWS AND NGI).

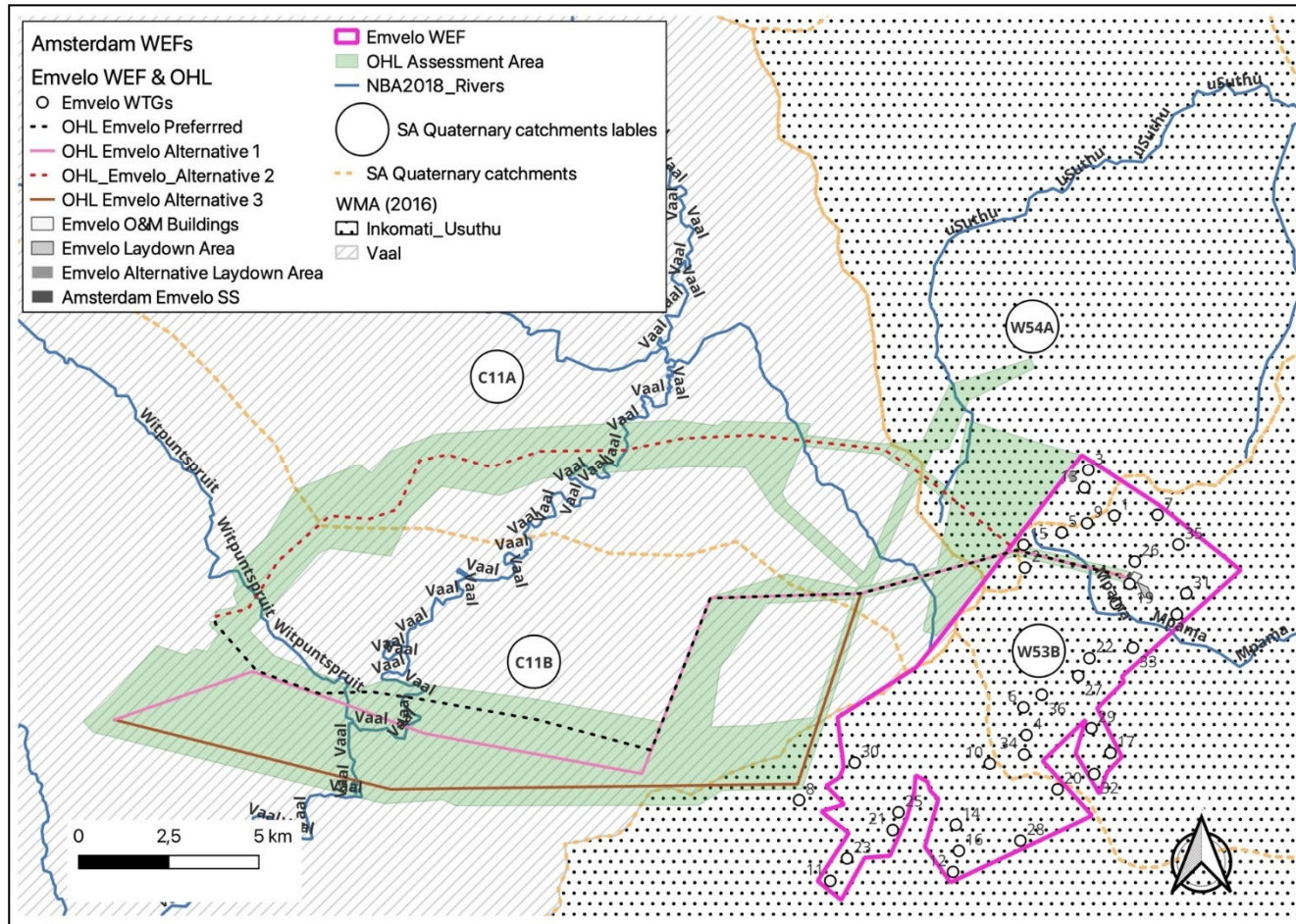


FIGURE 5-2 VARIOUS WATERBODIES IDENTIFIED IN THE NATIONAL WETLAND INVENTORY V5.2 (2020)

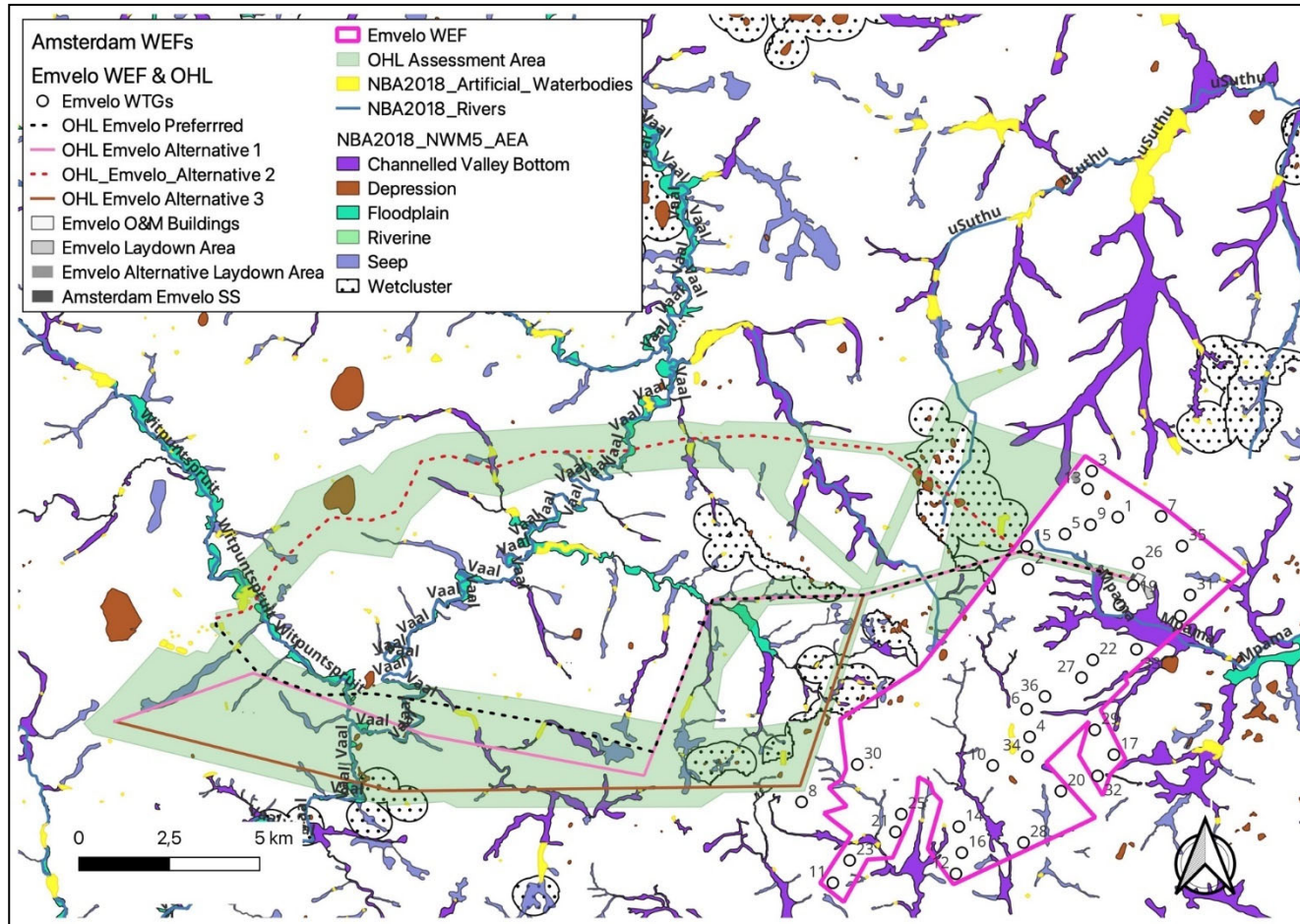


FIGURE 5-3 THE RESPECTIVE SUBQUATERNARY CATCHMENTS RATED IN TERMS OF FRESHWATER ECOSYSTEM PRIORITY AREAS (FEPAS) AND STRATEGIC WATER RESOURCE AREAS IN RELATION TO THE STUDY AREA

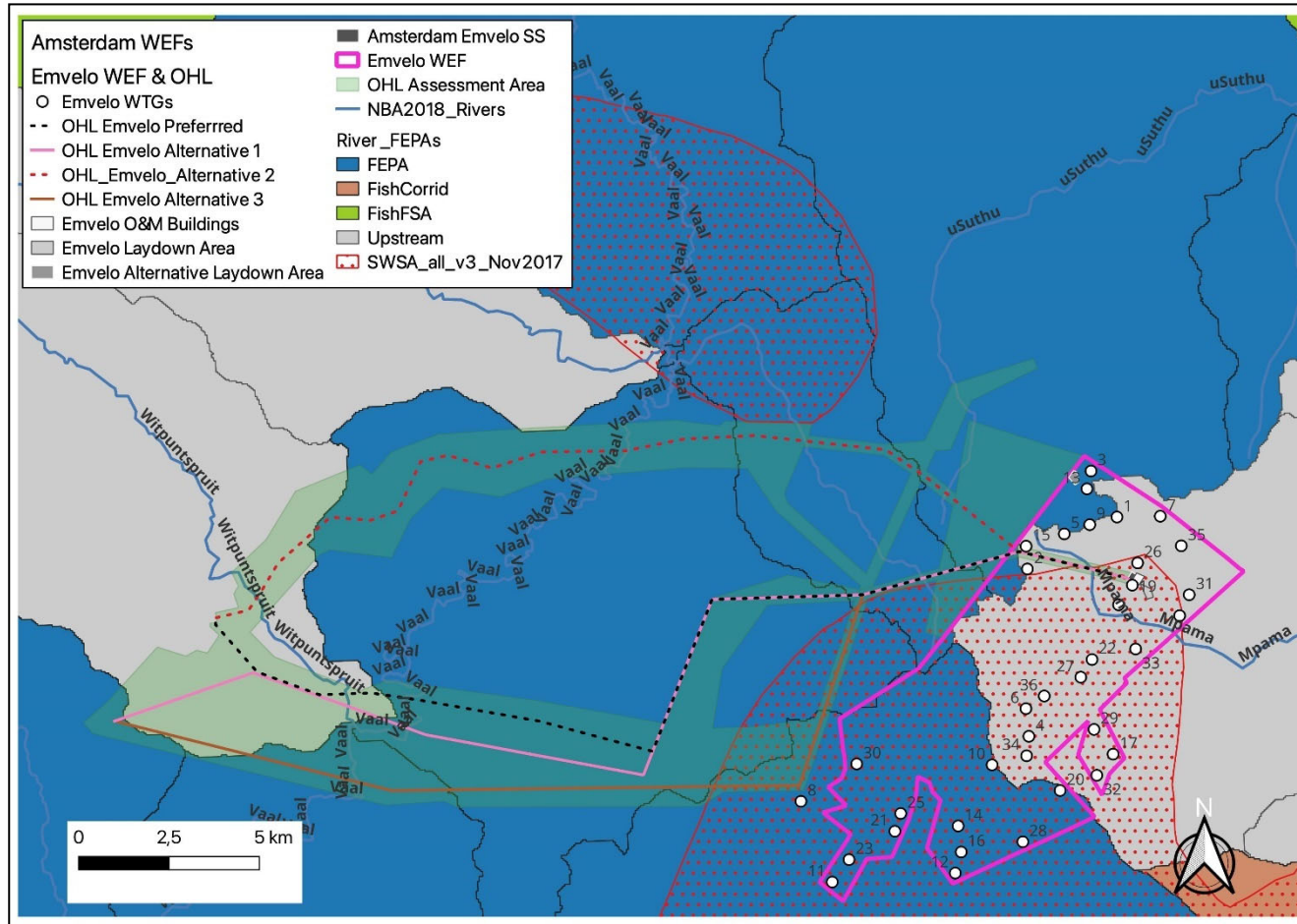


FIGURE 5-4 A VIEW OF A MAINSTEM WATERCOURSE (TRIBUTARY OF THE MPAMA RIVER), WITH TRANSFORMED FLOODPLAIN



FIGURE 5-5 A VIEW OF CHANNELLED VALLEY BOTTOM WETLAND WITHIN A TRANSFORMED CATCHMENT (CROP PRODUCTION & GRAZING)



FIGURE 5-6 ONE OF THE SMALLER ENDORHEIC PANS THAT IS LOCATED NEAR THE OHL BETWEEN THE WEF AND ERMELO



FIGURE 5-7 SEEPAGE WETLAND IN THE HEADWATER AREAS OF THE VAAL RIVER / USUTU RIVER CATCHMENT DIVIDE



5.8 TERRESTRIAL BIODIVERSITY (FLORA AND FAUNA)

5.8.1 FLORA – VEGETATION TYPES

Several threatened or protected, endemic and range restricted species are known from the surrounding area. Due to the localised nature of the impact, as well as the level of degradation of the site, the risk of a species suffering any significant loss is low to medium.

The site falls within the general distribution range of several endemic species and other SCC, some with a highly localised distribution and/or some of which may be Critically Endangered, Endangered, Vulnerable or Rare. Some of these species are also only from a single or a few populations. As per Table 5-2, Critically Endangered flora species are likely not present, but two Endangered species are known to occur in the vicinity. Seasonal site verification will be required to confirm presence or absence, which may include follow up at final walkdown stage for micro-siting. Sensitive species names have not been included as per reporting protocols.

TABLE 5-2: FLORA INCLUDING SPECIES OF SPECIAL CONCERN (ENDANGERED SPECIES IN BOLD) FLAGGED FOR THE WEF SITE AND GRID CONNECTION ROUTE

Scientific Name	Family	Status	Comment/Presence
Asparagus fractiflexus	Asparagaceae	EN A2c; B1ab(iii)	Possibly present, nearby records
Aspidoglossum xanthosphaerum	Apocynaceae	VU D2	Possibly present, nearby records
Gerbera aurantiaca	Asteraceae	EN A2ac	Possibly present, nearby records
Indigofera hybrida	Fabaceae	VU D2	Possibly present, nearby records
Khadia alticola	Aizoaceae	Rare	Possibly present, within range but no confirmed records nearby.
Khadia carolinensis	Aizoaceae	VU A3c	Possibly present, nearby records
Lotononis amajubica	Fabaceae	Rare	Possibly present, nearby records
Pachycarpus suaveolens	Apocynaceae	VU B1ab(iii)	Possibly present, within range but no confirmed records nearby.
Sensitive species 1201		VU B1ab(i,ii,iii,iv,v)	Possibly present, nearby records
Sensitive species 1219		VU B1ab(iii)+2ab(iii), PNCO	Possibly present, within range but no confirmed records nearby.
Sensitive species 1252		VU A2cd, PNCO	Possibly present, within range but no confirmed records nearby.

Scientific Name	Family	Status	Comment/Presence
Sensitive species 321		Rare, PNCO	Possibly present, within range but no confirmed records nearby.
Sensitive species 41		VU B1ab(i,ii,iii,iv,v)+2ab(i,ii,iii,iv,v)	Possibly present, nearby records
Sensitive species 691		VU B1ab(ii,iii,v)	Possibly present, within range but no confirmed records nearby.
Sensitive species 851		VU B1ab(iii)	Possibly present, within range but no confirmed records nearby.
Sensitive species 998		EN A2bd	Possibly present, within range but no confirmed records nearby.
Zaluzianskya distans	Scrophulariaceae	Rare	Possibly present, within range but no confirmed records nearby.

Fauna – Mammals (Ourebia ourebi ourebi (Zimmermann, 1783) Oribi)

Table 5-3, Endangered or Critically terrestrial fauna species are flagged for the site. The site falls within the potential distribution range of a few faunal species of concern. Since the project footprint is likely to be relatively contained, any disturbance or displacement associated with habitat destruction as a direct result of the activity is unlikely to pose a significant negative impact to terrestrial faunal species above background disturbance levels that are already present. Seasonal assessments of the fauna recommended for clarification of risk.

Ourebia ourebi ourebi (Zimmermann, 1783) Oribi. The oribi (Ourebia ourebi) is a small, territorial antelope that occurs throughout sub-Saharan Africa where it typically inhabits open temperate grasslands.

Thirteen subspecies are currently recognised, with the South African subspecies O. ourebi ourebi recognised as genetically distinct from other subspecies to the north. As such, oribi in South Africa should be managed as a distinct conservation unit (Jansen van Vuuren, Rushworth and Montgelard, 2017). It has a 2016 Regional Red List Status of Endangered C2a(ii) and is considered as the most threatened antelope species in South Africa with a minimum estimated total of approximately 2000 mature individuals remaining (Conservation Breeding Specialist Group Southern Africa et al., 2006; Shrader et al., 2016).

Ourebia ourebi ourebi populations have become restricted to small, isolated populations in grasslands in the eastern half of South Africa, occurring in grasslands in Mpumalanga, Eastern Cape and KwaZulu-Natal provinces. A few subpopulations in southern and north-eastern Free State, and southern Limpopo are also known. Fragmentation of populations and declining population numbers (~13% decline between 1996-2014) are the result of several anthropogenic factors, including hunting and poaching, habitat loss and fragmentation, and poor veld management (e.g. fencing, burning, overgrazing).

Habitat requirements include both short grass for food and long grass for food and shelter. They are selective feeders with several species of grass making up most of their diet, (*Themeda triandra*, *Hyparrhenia hirta*, *Panicum natalense*, and *Andropogon chinensis*) (Shrader et al., 2016).

They also appear to favour north and east facing slopes, with populations showing preferences for gentle slopes (less than ~10 degrees), gentle undulating plateaus, ridge tops, and spurs, and avoiding lowland areas (Conservation Breeding Specialist Group Southern Africa et al., 2006).

Further loss of grasslands on flat and undulating terrain is considered a very real threat to the survival of this charismatic sub-species.

Recent postings on iNaturalist indicate that Oribi are relatively frequently encountered within the broader grassland areas around the project site. For example, a 2020 photographic record form approximately 75 km south in Wakkerstroom Montane Grassland, a vegetation type found at the project site.

5.8.2 REPTILES

Reptiles such as lizards, snakes and tortoises may be present. Site survey and assessment would be required to confirm, however no specific species flagged.

5.8.3 INVERTEBRATE SSC - CLONIA LALANDEI (SAUSSURE, 1888) LALANDE'S BLACK-WINGED CLONIA

This species of katydid is endemic to South Africa and has an IUCN Red List Category and Criteria of Vulnerable B1ab(i,iii) (Bazelet and Naskrecki, 2014). Within South Africa, the species has a broad distribution occurring across the central parts of South Africa, having been recorded from the Free State, KwaZulu-Natal, and Mpumalanga Provinces.

It occurs in grassland and savanna habitats but has only been collected from four localities with almost nothing known about its specific habitat requirements or ecology.

It has an estimated extent of occurrence of 15,397 km² and its estimated geographic range falls just outside of the project area, approximately 12 km to the east (Bazelet and Naskrecki, 2014).

The species has not been recorded in the project area, the closest known record is approximately ~92 kms north-east for a specimen collected from Barberton Montane Grassland habitat.

5.8.4 AMPHIBIANS

Amphibians are likely to be present due to the prevalence of watercourses and wetlands. Site assessment would be required to confirm, however no specific species flagged.

5.8.5 ALIEN INVASIVE SPECIES

Alien invasive species cannot be investigated without site visit, but the nature of the site (cultivated and grazing) would suggest that several common local weed species are likely present in disturbed areas.

TABLE 5-3: FAUNA SPECIES OF SPECIAL CONCERN

Scientific Name	Common Name	Status	Comment/Presence
Mammals			
<i>Crocidura maquassiensis</i>	Makwassie musk shrew	VU, NEST (M)	Possibly present, within range but no confirmed records nearby.
<i>Ourebia ourebi</i>	Oribi	EN, NEST (M)	Possibly present, within range but no confirmed records nearby. May be a transient species to the site, unlikely to be significantly affected by the proposed WEF due to dispersed nature of layout and suitable available habitat in the area
Birds			
<i>Balearica regulorum</i>	Grey Crowned Crane	EN, NEST (H)	Refer to Avifaunal Assessment
<i>Eupodotis senegalensis</i>	White-bellied Bustard / Korhaan	VU, NEST (H, M)	Refer to Avifaunal Assessment
<i>Hydroprogne caspia</i>	Caspian Tern	VU, NEST (M)	Refer to Avifaunal Assessment
<i>Sagittarius serpentarius</i>	Secretary Bird	VU, NEST (H, M)	Refer to Avifaunal Assessment
<i>Tyto capensis</i>	African Grass Owl	VU, NEST (M)	Refer to Avifaunal Assessment
<i>Geronticus calvus</i>	Southern Bald Ibis	VU C1+2a(ii), NEST (H,M)	Refer to Avifaunal Assessment
<i>Neotis denhami</i>	Denhams Bustard	NEST (M)	Refer to Avifaunal Assessment
Reptiles			
None of concern	-	-	-
Amphibians			
None of concern	-	-	-
Invertebrates			
<i>Clonia lalandei</i>	Lalande's Black-winged Clonia	VU B1ab(i,iii)	Possibly present, within range but no confirmed records nearby.

The project area bisects large fragments of both natural vegetation, particularly of grassland escarpment, and areas of habitat that have been moderately to heavily transformed over several decades. The project area falls more-or-less equally across ecosystem types with a South African Red List of Ecosystems Status of Least Concern and Endangered (South African National Biodiversity Institute and Department of Forestry, 2021). Importantly, most of these areas still retain their natural extent. Of particular importance is the area falling over Wakkerstroom Montane Grassland which represents a large and contiguous piece of and an ecologically functional area of montane grassland.

The conservation importance of these areas, and several other areas of the project site, are further highlighted in the Mpumalanga Biodiversity Sector Plan (MTPA, 2014a). Several small areas of the project site are classed as Critical Biodiversity Areas (Irreplaceable and optimal). As detailed in Lötter, (2015), CBAs are required to meet biodiversity targets for species and ecosystems and ecological processes. They should remain in a natural state that is maintained in good ecological condition. CBAs are areas of high biodiversity value and include Critically Endangered Ecosystems and critical linkages (ecological corridors). Irreplaceable CBAs are recognised as the most important biodiversity areas in the Mpumalanga Province and are considered essential for meeting biodiversity targets. They are at high risk of being lost due to their remaining extent being near to or lower than the required biodiversity target. If Irreplaceable CBAs suffer additional losses, it is likely that species losses and breakdown of ecological processes will occur. CBA Optimal areas are the best localities (out of a potentially larger selection of available planning units) that are most optimally located to meet biodiversity targets. These areas have an irreplaceability <80%, and often represent the optimal solution for meeting biodiversity targets. They collectively reflect the most cost-efficient and smallest spatial extent required to meet biodiversity targets.

Most of the north, and parts of the southern area of the project site is classed as a 'priority focus area' by the national protected areas expansion strategy for South Africa (NPAES) (Balfour et al., 2018). These areas represent large, intact and unfragmented areas of high importance for biodiversity representation and ecological persistence, suitable for the creation and/or expansion of large, protected areas. They present the best opportunities for meeting the ecosystem-specific protected area targets of the NPAES and were modelled with emphasis on climate change resilience and requirements for protecting freshwater ecosystems.

The northern part of project area falls over an Important Bird Area (IBA): Grasslands (Marnewick et al., 2015). It also falls close to two other IBAs. IBAs are areas of high importance for bird conservation and are selected on the presence bird species of global or regional conservation concern; assemblages of restricted-range bird species; assemblages of biome-restricted bird species; and concentrations of numbers of congregatory bird species.

5.9 AVIFAUNA

The WEF and Grid Connection Project Site is situated in the Grassland Biome, in the Mesic Highveld Grassland Bioregion (Mucina & Rutherford 2006). The proposed site is comprised of undulating grassland plains, with small, scattered patches of dolerite outcrops in areas, low hills, pan depressions and drainage lines with associated wetland areas. Vegetation on site consists

predominantly of Wakkerstroom Montane Grassland and Eastern Highveld Grassland. Wakkerstroom Montane Grassland comprises predominantly short montane grasslands on the plateaus and the relatively flat areas, with short forest and *Leucosidea* (ouhout) thickets occurring along steep, mainly east-facing slopes, and drainage areas (Mucina & Rutherford 2006). Eastern Highveld Grassland vegetation is comprised of a short, closed grassland cover, largely dominated by a dense *Themeda triandra* sward, often severely grazed to form a short lawn (Mucina & Rutherford 2006). The black wattle *Acacia mearnsii* is an aggressive invader of riparian areas. Stands of alien *Eucalyptus* and *Pinus* species are scattered throughout the proposed development area.

Ermelo has a temperate climate. January is the warmest month with a maximum temperature of 24 C°. June and July are the coldest months, with a minimum temperature of 0.2 C°. The driest month is June with an average of 3 mm of precipitation. Most of the precipitation falls in December, averaging 151 mm. The average annual precipitation is around 756 mm (Climate – data.org 2021). The topography in the project area is characterised by gentle undulating plains. The predominant land use for this area is livestock grazing with some crop farming, mostly maize, soya beans and pastures. The livestock in the study area is a combination of mostly sheep and cattle, with a few horses.

5.9.1 MODIFIED ENVIRONMENT

Whilst the distribution and abundance of the bird species in the Broader Area are mostly associated with natural vegetation, as this comprises virtually all the habitat, it is also necessary to examine the few external modifications to the environment that have relevance for birds.

The following avifaunal-relevant anthropogenic habitat modifications were recorded within the Broader Area:

- Surface Water: The WEF Project Site and Grid Connection PAOI contains several man-made sources of surface water such as ground dams and boreholes. These sources of water are important for birds for drinking and bathing.
- Alien Trees: There are clumps and stands of alien trees throughout the WEF Project Site and Grid Connection PAOI. Alien trees could attract a variety of bird species for the purposes of nesting and roosting.
- Agriculture: The predominant land use for this area is livestock grazing with some crop farming, mostly maize, soya beans and pastures. Birds could be attracted to these areas in search of food.

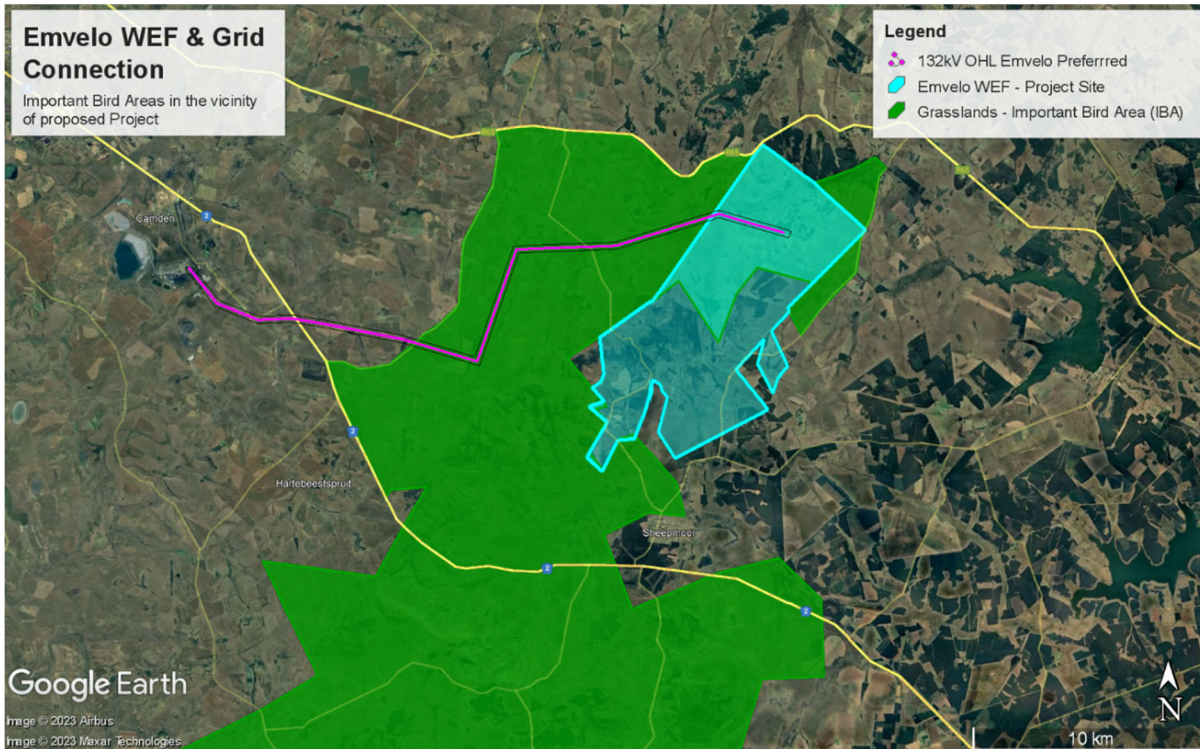
5.9.2 IMPORTANT BIRD AREAS (IBAS)

The Project Site partially overlaps with one Important Bird Area (IBA), namely the Grasslands IBA SA020 (Figure 5-8). Due to the proximity of the IBA, it is possible that some priority species that are also IBA trigger species, and occur either permanently or sporadically in the IBA, might be impacted by the project. Species recorded in the Broader Area that fall in this category include the following:

- Secretarybird
- Pied Avocet

- Denham's Bustard
- Blue Crane
- Grey Crowned Crane
- Wattled Crane
- White-backed Duck
- Yellow-billed Duck
- Martial Eagle
- Lanner Falcon
- Greater Flamingo
- Lesser Flamingo
- Black-necked Grebe
- Little Grebe
- African Marsh Harrier
- Black Harrier
- Southern Bald Ibis
- African Grass Owl
- Southern Pochard
- Cape Shoveler
- White-winged Tern

FIGURE 5-8: IMPORTANT BIRD AREAS IN THE VICINITY OF THE PROPOSED PROJECT.



5.9.3 NATIONAL PROTECTED AREAS

The closest protected area to the proposed development is the Nooitgedacht Dam Nature Reserve (70km). The avifauna in this protected area is not expected to be impacted by the proposed development due to the distance from the WEF and Grid project sites.

5.9.4 AVIFAUNA IN THE BROADER AREA

According to the Southern African Bird Atlas Project (SABAP2) a total of 253 bird species could potentially occur in the Broader Area where the proposed Emvelo WEF and Grid Connection Infrastructure are located. Of the 253 species, 38 species are classified as priority species for wind energy developments. The wind priority species include all species of conservation concern and although a few IBA trigger species are not included in this list the exclusion areas recommended for other similar species included as priority species offer adequate protection for these additional (particularly wetland associated) species. Of the wind energy development priority species in the Broader Area, 32 (84%) have been recorded during the pre-construction monitoring conducted thus far. Of the 253 species, 76 are considered power line sensitive species and 57 (75%) of the power line sensitive species have been recorded during the pre-construction monitoring.

Table 5 and Table 6 below list all the priority species and the possible impact on the respective species by the proposed WEF and Grid Connection.

LC = Least Concern	H = High
NT = Near Threatened	M = Medium
VU = Vulnerable	L = Low
EN = Endangered	

TABLE 5-4 WIND ENERGY PRIORITY SPECIES RECORDED IN THE BROADER AREA.

Species Name	Scientific Name	Full Protocol	Ad Hoc Protocol	Global Conservatio	Regional Conservatio	Recorded During	Likelihood Of Regular	Grassland	Woodland & Alien	Drainage & Lines	Dams	Agriculture	Collision With	Displaceme nt - Habitat	Displaceme nt -	Electrocuti on MV	Collision MV
African Fish Eagle	<i>Haliaeetus vocifer</i>	7,26	0,92	-	-	x	M			x	x		x		x	x	
African Harrier-Hawk	<i>Polyboroides typus</i>	15,64	2,29	-	-	x	H		x		x		x		x	x	
African Marsh Harrier	<i>Circus ranivorus</i>	4,47	0,46	-	EN	x	M	x		x	x		x		x	x	
Amur Falcon	<i>Falco amurensis</i>	26,26	9,63	-	-	x	H	x	x		x	x	x			x	
Black Harrier	<i>Circus maurus</i>	0,00	0,46	EN	EN		L	x			x		x		x	x	
Black Sparrowhawk	<i>Accipiter melanoleucus</i>	15,08	1,38	-	-	x	M		x		x		x		x	x	
Black-bellied Bustard	<i>Lissotis melanogaster</i>	4,47	0,00	-	-	x	M	x				x	x	x	x		x

Species Name	Scientific Name	Full Protocol	Ad Hoc Protocol	Global Conservatio	Regional Conservatio	Recorded During	Likelihood Of Regular	Grassland	Woodland & Alien	Drainage & Lines	Dams	Agriculture	Collision With	Displaceme nt - Habitat	Displaceme nt -	Electrocuti on	Collision MV
Black-chested Snake Eagle	<i>Circaetus pectoralis</i>	4,47	0,46	-	-	x	M		x		x		x		x	x	
Black-rumped Buttonquail	<i>Turnix nanus</i>	2,79	0,00	-	EN		L	x		x				x	x		
Black-winged Kite	<i>Elanus caeruleus</i>	65,92	14,22	-	-	x	H	x	x		x		x		x	x	
Black-winged Lapwing	<i>Vanellus melanopterus</i>	21,23	1,38	-	-	x	H	x		x		x	x	x			
Blue Crane	<i>Grus paradisea</i>	12,85	0,46	VU	NT	x	M	x		x	x	x	x	x	x		x
Blue Korhaan	<i>Eupodotis caerulescens</i>	0,56	0,00	NT	LC		L	x					x	x	x		x
Brown Snake Eagle	<i>Circaetus cinereus</i>	2,79	0,00	-	-	x	M		x		x		x		x	x	
Buff-streaked Chat	<i>Campicoloides bifasciatus</i>	7,82	0,00	-	-	x	M	x						x	x		

Species Name	Scientific Name	Full Protocol	Ad Hoc Protocol	Global Conservatio	Regional Conservatio	Recorded During	Likelihood Of Regular	Grassland	Woodland & Alien	Drainage & Lines	Dams	Agriculture	Collision With	Displacement - Habitat	Displacement -	Electrocution	Collision MV
Cape Eagle-Owl	<i>Bubo capensis</i>	- ⁸	-	-	-	x	M	x	x	x		x	x	x	x	x	x
Cape Vulture	<i>Gyps coprotheres</i>	3,35	0,00	VU	EN	x	M	x			x		x		x	x	x
Common Buzzard	<i>Buteo buteo</i>	39,11	16,97	-	-	x	H	x	x		x	x	x			x	
Denham's Bustard	<i>Neotis denhami</i>	5,03	0,00	NT	VU	x	M	x				x	x	x	x		x
Forest Buzzard	<i>Buteo trizonatus</i>	-	-	NT	LC	x	M		x	x	x		x	x	x	x	x
Greater Flamingo	<i>Phoenicopterus roseus</i>	1,68	0,00	-	NT	x	M			x	x		x				x
Grey Crowned Crane	<i>Balearica regulorum</i>	15,64	0,46	EN	EN	x	H	x			x		x	x	x	x	x

⁸ No Reporting Rate as this species was recorded during monitoring only and not through SABAP2.

Species Name	Scientific Name	Full Protocol	Ad Hoc Protocol	Global Conservatio	Regional Conservatio	Recorded During	Likelihood Of Regular	Grassland	Woodland & Alien	Drainage & Lines	Dams	Agriculture	Collision With	Displacement - Habitat	Displacement -	Electrocution MV	Collision MV
Grey-winged Francolin	<i>Scleroptila afra</i>	15,08	0,00	-	-	x	M	x				x	x	x	x		
Jackal Buzzard	<i>Buteo rufofuscus</i>	32,40	8,72	-	-	x	H	x	x		x	x	x		x	x	
Lanner Falcon	<i>Falco biarmicus</i>	12,85	0,46	-	VU	x	M	x			x		x		x	x	
Lesser Flamingo	<i>Phoeniconaias minor</i>	1,12	0,00	NT	NT		L			x	x		x				x
Long-crested Eagle	<i>Lophaetus occipitalis</i>	13,97	14,22	-	-	x	M		x		x		x		x	x	
Marsh Owl	<i>Asio capensis</i>	1,68	0,46	-	-	x	M	x		x	x		x	x	x	x	x
Martial Eagle	<i>Polemaetus bellicosus</i>	5,59	0,00	EN	EN	x	M	x	x		x		x		x	x	
Northern Black Korhaan	<i>Afrotis afraoides</i>	0,56	0,00	-	-		L	x				x	x	x	x		x

Species Name	Scientific Name	Full Protocol	Ad Hoc Protocol	Global Conservatio	Regional Conservatio	Recorded During	Likelihood Of Regular	Grassland	Woodland & Alien	Drainage & Lines	Dams	Agriculture	Collision With	Displaceme nt - Habitat	Displaceme nt -	Electrocuti on	Collision MV
Rufous-breasted Sparrowhawk	<i>Accipiter rufiventris</i>	1,68	0,00	-	-	x	M		x		x		x		x	x	
Secretarybird	<i>Sagittarius serpentarius</i>	24,02	2,29	EN	VU	x	H	x					x	x	x		x
Southern Bald Ibis	<i>Geronticus calvus</i>	26,82	4,13	VU	VU	x	H	x			x	x	x		x	x	x
Spotted Eagle-Owl	<i>Bubo africanus</i>	11,73	1,38	-	-	x	M		x	x			x		x	x	x
Western Osprey	<i>Pandion haliaetus</i>	0,56	0,00	-	-		L				x		x		x	x	
White Stork	<i>Ciconia ciconia</i>	10,61	2,29	-	-	x	M	x		x	x	x	x				x
White-bellied Bustard	<i>Eupodotis senegalensis</i>	12,29	0,00	-	VU	x	H	x				x	x	x	x		x

Species Name	Scientific Name	Full Protocol	Ad Hoc Protocol	Global Conservatio	Regional Conservatio	Recorded During	Likelihood Of Regular	Grassland	Woodland & Alien	Drainage & Lines	Dams	Agriculture	Collision With	Displacement - Habitat	Displacement -	Electrocution MV	Collision MV
Yellow-breasted Pipit	<i>Anthus chloris</i>	1,12	0,00	VU	VU	x	M	x					x	x	x		

TABLE 5-5: POWERLINE SENSITIVE SPECIES RECORDED IN THE BROADER AREA.

Species Name	Scientific Name	Full Protocol	Ad Hoc Protocol	Global Conservation Status	Regional Conservation Status	Recorded During Monitoring	Likelihood Of Regular Occurrence	Grassland	Woodland & Alien Trees	Drainage Lines & Wetlands	Dams	Agriculture	Power line - Electrocutation HV	Power line - Collision
African Black Duck	<i>Anas sparsa</i>	4,47	0,00	-	-		L			x	x			x
African Darter	<i>Anhinga rufa</i>	14,53	3,21	-	-	x	M			x	x			x
African Fish Eagle	<i>Haliaeetus vocifer</i>	7,26	0,92	-	-	x	M			x	x			
African Goshawk	<i>Accipiter tachiro</i>	0,56	0,00	-	-	x	M		x					
African Harrier-Hawk	<i>Polyboroides typus</i>	15,64	2,29	-	-	x	H		x		x			
African Marsh Harrier	<i>Circus ranivorus</i>	4,47	0,46	-	EN	x	M	x		x	x			
African Sacred Ibis	<i>Threskiornis aethiopicus</i>	37,43	5,50	-	-	x	H			x	x	x		x
African Spoonbill	<i>Platalea alba</i>	22,91	1,83	-	-	x	H			x	x			x

African Swamphen	<i>Porphyrio madagascariensis</i>	6,15	2,75	-	-		M			x	x			
Amur Falcon	<i>Falco amurensis</i>	26,26	9,63	-	-	x	H	x	x		x	x		
Black Harrier	<i>Circus maurus</i>	0,00	0,46	EN	EN		L	x			x			
Black Heron	<i>Egretta ardesiaca</i>	0,56	0,00	-	-		L			x	x			x
Black Sparrowhawk	<i>Accipiter melanoleucus</i>	15,08	1,38	-	-	x	M		x		x			
Black-bellied Bustard	<i>Lissotis melanogaster</i>	4,47	0,00	-	-	x	M	x				x		x
Black-chested Snake Eagle	<i>Circaetus pectoralis</i>	4,47	0,46	-	-	x	M		x		x			
Black-headed Heron	<i>Ardea melanocephala</i>	50,28	2,75	-	-	x	H	x		x	x	x		x
Black-necked Grebe	<i>Podiceps nigricollis</i>	0,56	0,46	-	-		L			x	x			x
Black-winged Kite	<i>Elanus caeruleus</i>	65,92	14,22	-	-	x	H	x	x		x			
Blue Crane	<i>Grus paradisea</i>	12,85	0,46	VU	NT	x	M	x		x	x	x		x
Blue Korhaan	<i>Eupodotis caerulescens</i>	0,56	0,00	NT	LC		L	x						x
Blue-billed Teal	<i>Spatula hottentota</i>	0,56	0,00	-	-		L			x	x			x
Brown Snake Eagle	<i>Circaetus cinereus</i>	2,79	0,00	-	-	x	M		x		x			

Cape Crow	<i>Corvus capensis</i>	12,85	0,00	-	-		M	x	x			x		
Cape Eagle-Owl	<i>Bubo capensis</i>	-	-	-	-	x	M	x	x	x		x		x
Cape Shoveler	<i>Spatula smithii</i>	15,08	0,46	-	-	x	H			x	x			x
Cape Teal	<i>Anas capensis</i>	0,56	0,00	-	-		L			x	x			x
Cape Vulture	<i>Gyps coprotheres</i>	3,35	0,00	VU	EN	x	M	x			x		x	x
Common Buzzard	<i>Buteo buteo</i>	39,11	16,97	-	-	x	H	x	x		x	x		
Common Moorhen	<i>Gallinula chloropus</i>	29,61	4,13	-	-	x	H			x	x			
Denham's Bustard	<i>Neotis denhami</i>	5,03	0,00	NT	VU	x	M	x				x		x
Egyptian Goose	<i>Alopochen aegyptiaca</i>	69,27	9,63	-	-	x	H	x		x	x	x		x
Forest Buzzard	<i>Buteo trizonatus</i>	-	-	NT	LC	x	M		x	x	x			x
Fulvous Whistling Duck	<i>Dendrocygna bicolor</i>	0,00	0,46	-	-		L			x	x			x
Glossy Ibis	<i>Plegadis falcinellus</i>	4,47	0,92	-	-	x	M			x	x			x
Goliath Heron	<i>Ardea goliath</i>	1,68	0,00	-	-		L			x	x			x
Great Egret	<i>Ardea alba</i>	8,94	1,38	-	-	x	M			x	x			x

Greater Flamingo	<i>Phoenicopterus roseus</i>	1,68	0,00	-	NT	x	M			x	x			x
Grey Crowned Crane	<i>Balearica regulorum</i>	15,64	0,46	EN	EN	x	H	x		x	x	x		x
Grey Heron	<i>Ardea cinerea</i>	20,67	1,83	-	-	x	H			x	x			x
Hadada Ibis	<i>Bostrychia hagedash</i>	83,24	12,84	-	-	x	H	x		x	x	x		x
Hamerkop	<i>Scopus umbretta</i>	16,76	0,46	-	-	x	H			x	x			x
Helmeted Guineafowl	<i>Numida meleagris</i>	54,19	3,67	-	-	x	H	x	x	x	x	x		
Intermediate Egret	<i>Ardea intermedia</i>	16,76	1,83	-	-	x	H			x	x			x
Jackal Buzzard	<i>Buteo rufofuscus</i>	32,40	8,72	-	-	x	H	x	x		x	x		
Lanner Falcon	<i>Falco biarmicus</i>	12,85	0,46	-	VU	x	M	x			x			
Lesser Flamingo	<i>Phoeniconaias minor</i>	1,12	0,00	NT	NT		L			x	x			x
Little Egret	<i>Egretta garzetta</i>	1,68	0,92	-	-		L			x	x			x
Little Grebe	<i>Tachybaptus ruficollis</i>	51,96	5,96	-	-	x	H			x	x			x
Long-crested Eagle	<i>Lophaetus occipitalis</i>	13,97	14,22	-	-	x	M		x		x			
Marsh Owl	<i>Asio capensis</i>	1,68	0,46	-	-	x	M	x		x	x	x		x

Martial Eagle	<i>Polemaetus bellicosus</i>	5,59	0,00	EN	EN	x	M	x	x		x	x		
Northern Black Korhaan	<i>Afrotis afraoides</i>	0,56	0,00	-	-		L	x				x		x
Pied Crow	<i>Corvus albus</i>	11,73	3,67	-	-	x	M	x	x	x	x	x		
Purple Heron	<i>Ardea purpurea</i>	10,06	0,00	-	-	x	M			x	x			x
Red-billed Teal	<i>Anas erythrorhyncha</i>	21,79	2,29	-	-	x	H			x	x			x
Red-knobbed Coot	<i>Fulica cristata</i>	58,10	8,26	-	-	x	H			x	x			x
Reed Cormorant	<i>Microcarbo africanus</i>	56,98	6,88	-	-	x	H			x	x			x
Rock Kestrel	<i>Falco rupicolus</i>	7,26	0,92	-	-		M	x	x			x		
Rufous-breasted Sparrowhawk	<i>Accipiter rufiventris</i>	1,68	0,00	-	-	x	M		x		x			
Secretarybird	<i>Sagittarius serpentarius</i>	24,02	2,29	EN	VU	x	H	x						x
South African Shelduck	<i>Tadorna cana</i>	30,73	4,59	-	-	x	H			x	x			x
Southern Bald Ibis	<i>Geronticus calvus</i>	26,82	4,13	VU	VU	x	H	x						x
Southern Pochard	<i>Netta erythrophthalma</i>	3,91	0,00	-	-	x	L			x	x			x

Spotted Eagle-Owl	<i>Bubo africanus</i>	11,73	1,38	-	-	x	M		x	x				x
Spur-winged Goose	<i>Plectropterus gambensis</i>	57,54	5,50	-	-	x	H	x		x	x	x		x
Squacco Heron	<i>Ardeola ralloides</i>	1,12	0,00	-	-		L			x	x			x
Western Barn Owl	<i>Tyto alba</i>	5,03	0,92	-	-		M	x	x			x		x
Western Cattle Egret	<i>Bubulcus ibis</i>	34,08	6,88	-	-	x	H	x		x	x	x		x
Western Osprey	<i>Pandion haliaetus</i>	0,56	0,00	-	-		L				x			
White Stork	<i>Ciconia ciconia</i>	10,61	2,29	-	-	x	M			x	x			x
White-backed Duck	<i>Thalassornis leuconotus</i>	5,59	0,46	-	-	x	M			x	x			x
White-bellied Bustard	<i>Eupodotis senegalensis</i>	12,29	0,00	-	VU	x	H	x				x		x
White-breasted Cormorant	<i>Phalacrocorax lucidus</i>	8,94	1,38	-	-	x	M			x	x			x
White-faced Whistling Duck	<i>Dendrocygna viduata</i>	1,68	0,00	-	-		L			x	x			x
Yellow-billed Duck	<i>Anas undulata</i>	60,89	6,88	-	-	x	H			x	x			x
Yellow-billed Kite	<i>Milvus aegyptius</i>	3,91	0,46	-	-	x	M	x	x	x	x	x		

5.9.5 RESULTS OF PRE-CONSTRUCTION BIRD MONITORING

The objective of the pre-construction monitoring at the proposed Emvelo WEF was to gather baseline data over a period of four seasons (seven surveys) on the following aspects pertaining to avifauna:

- The abundance and diversity of birds at the proposed WEF site and at a suitable control site, to measure the potential displacement effect of the wind farm.
- Flight patterns of priority species to assess the potential collision risk with the turbines and associated power line infrastructure.

Monitoring at the WEF sites and a Control Site were conducted by a team of monitors 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 (Transect counts only)
- 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
- 15–23 November 2023
- 30 November–05 December 2023
- 17–22 January 2024
- 14–20 February 2024

Table 5-6 and Figure 5-9 to 5-11 below present the results of the pre-construction monitoring conducted at the WEF site and control area.

5.9.5.1 TRANSECTS

The results of the transect counts after seven surveys are presented in Table 5-6:

TABLE 5-6: THE RESULTS OF THE WALK AND DRIVE TRANSECTS.

TURBINE SITE	
Species Composition	Number
All Species	180

Priority Species	19 (11%)
Non-Priority Species	161
Total Count	
Drive Transects	10 583
Walk Transects	8095
Total	18 678

CONTROL SITE

Species Composition	Number
All Species	110
Priority Species	9 (8%)
Non-Priority Species	101
Total Count	
Drive Transects	3309
Walk Transects	1870
Total	5179

An Index of Kilometric Abundance (IKA = birds/km) was calculated for each priority species recorded during transects across four seasons and seven surveys (FIGURE 5-9 and Figure 5-10). Figure 5-11 below shows the spatial distribution of the priority species recorded during transect counts and incidental sightings over all four seasons.

FIGURE 5-9: INDEX OF KILOMETRIC ABUNDANCE OF PRIORITY SPECIES RECORDED AT THE WEF AND CONTROL SITE DURING DRIVE TRANSECT SURVEYS (SEVEN SURVEYS).

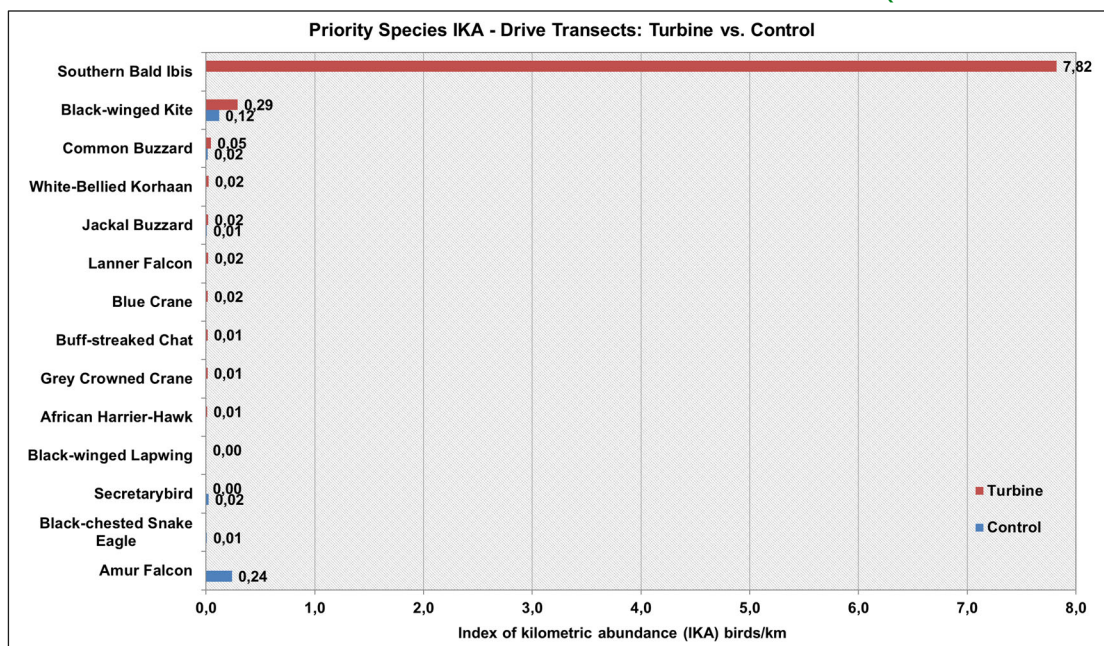


FIGURE 5-10: INDEX OF KILOMETRIC ABUNDANCE OF PRIORITY SPECIES RECORDED AT THE WEF DURING WALK TRANSECT SURVEYS (SEVEN SURVEYS).

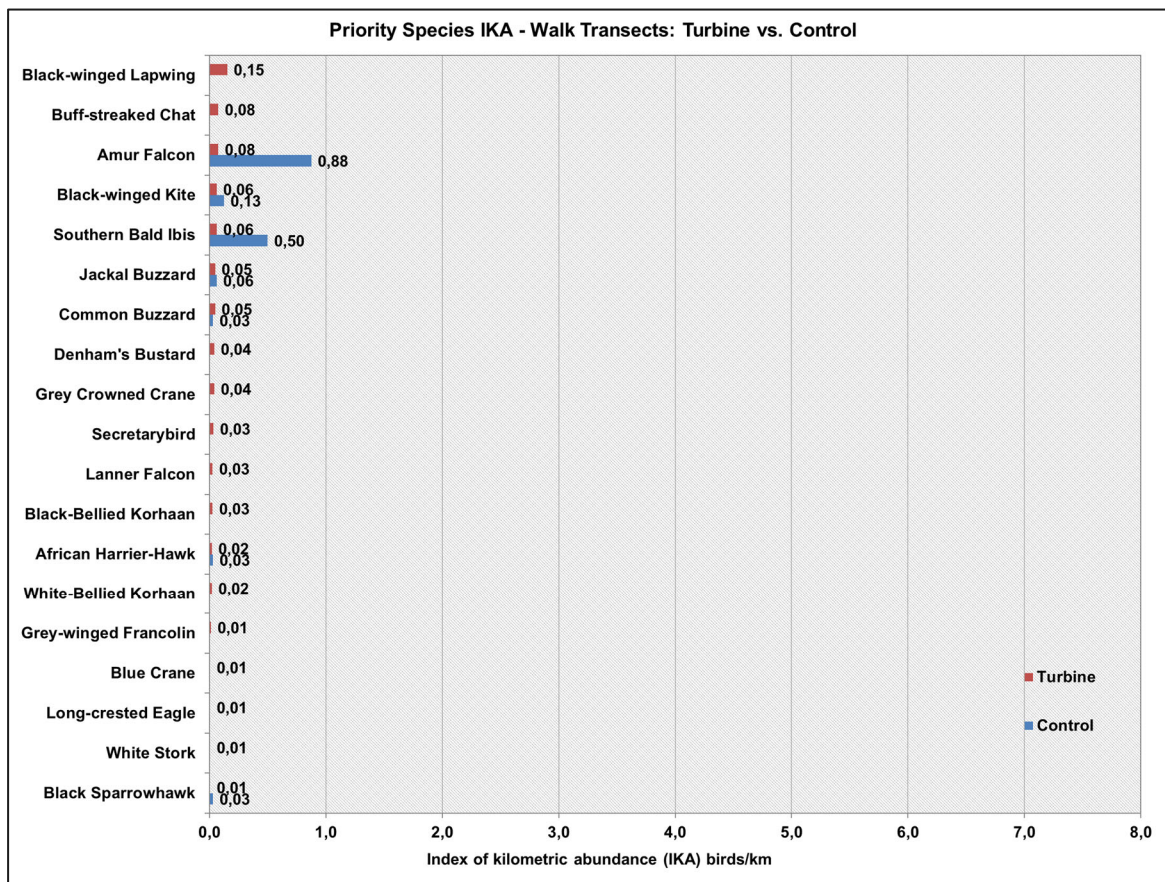
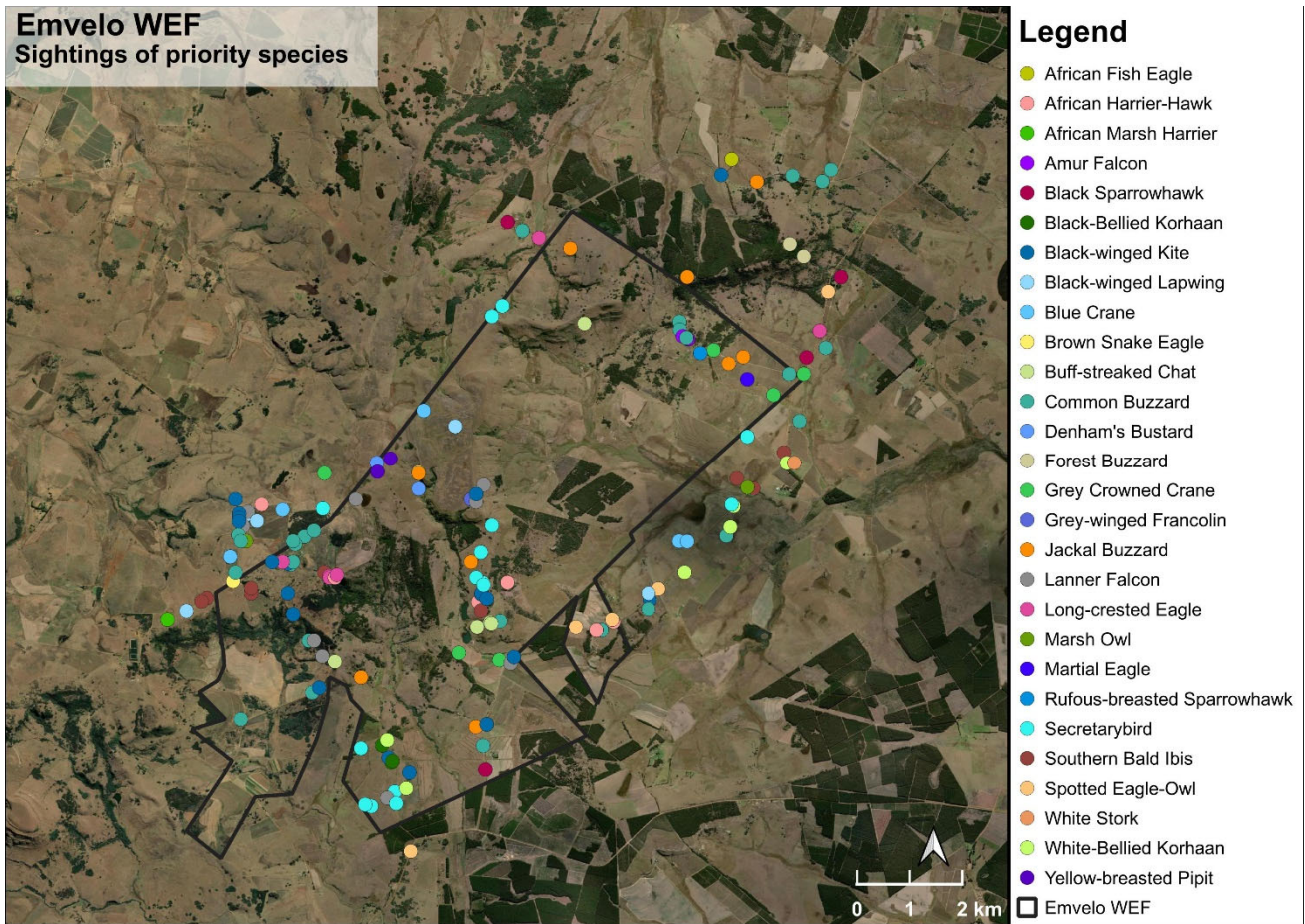


FIGURE 5-11: THE LOCATION OF PRIORITY SPECIES RECORDED AT THE PROPOSED EMVELO WEF THROUGH TRANSECT COUNTS AND INCIDENTAL SIGHTINGS



5.9.6 FOCAL POINTS

Three focal points (FP) of bird activity have been identified thus far:

- FP1: A large farm dam in a drainage line. This FP was surveyed once during each survey.
- FP2: Southern Bald Ibis colony (26°37'20.82" South, 30°18'36.43" East)
- FP3: Southern Bald Ibis colony (26°38'28.47" South, 30°17'37.67" East)

A Martial Eagle nest was discovered towards the end of the initial pre-construction monitoring campaign and subsequent additional monitoring effort was devoted to the nest to better understand the flight risk of the eagles around the nest.

TABLE 5-7: RESULTS OF FOCAL POINT SURVEYS

Focal Points	Survey 1	Survey 2	Survey 3	Survey 4	Survey 5	Survey 6	Survey 7
	Priority Species Recorded						
FP1	Southern Bald Ibis (SBI),	No Priority Species	Southern Bald Ibis	Southern Bald Ibis	47 SBIs seen	36 SBIs seen	2 SBIs seen and Black Sparrowhaw

	Grey Crowned Crane Roost						seen hunting in area
FP2: SBI Colony	NA	NA	NA	Southern Bald Ibis (nesting with chicks), Long-crested Eagle, African Harrier Hawk and African Goshawk	No Priority Species	more than 8 SBI seen, no nests or remnants of nests seen	8 SBIs and Lanner Falcon seen
FP3: SBI Colony	NA	NA	NA	Southern Bald Ibis (2 confirmed active nests), Buff-streaked Chat, Jackal Buzzard and Denham's Bustard	No SBIs, no nests and no whitewash seen. Long-Crested Eagle flew past	3 SBI nests with guano, 1 Jackal Buzzard seen, and 1 Cape Eagle-Owl heard	No SBIs, nests nor remnants seen

5.9.6.1 INCIDENTAL COUNTS

Table 5-8 provides an overview of the incidental sightings of priority species during the four seasonal surveys.

TABLE 5-8: INCIDENTAL SIGHTINGS OF PRIORITY SPECIES MADE DURING THE SEASONAL SURVEYS (SEVEN SURVEYS) AT THE WEF CLUSTER (ROCHDALE, EMVELO, AND SHEEPMOOR WEFS).

Priority Species – Incidental Sightings		S1	S2	S3	S4	S5	S6	S7	Total
Southern Bald Ibis	<i>Geronticus calvus</i>	70	28	0	24	3	0	1	126
Black-winged Kite	<i>Elanus caeruleus</i>	6	3	8	18	5	2	2	44
Common Buzzard	<i>Buteo buteo</i>	12	0	0	18	0	0	0	30

Black-winged Lapwing	<i>Vanellus melanopterus</i>	4	1	0	11	0	3	9	28
Jackal Buzzard	<i>Buteo rufofuscus</i>	5	5	2	4	4	0	3	23
Grey-winged Francolin	<i>Scleroptila afra</i>	0	0	0	1	1	18	0	20
Grey Crowned Crane	<i>Balearica regulorum</i>	12	2	0	4	0	0	0	18
Spotted Eagle-Owl	<i>Bubo africanus</i>	1	5	3	4	1	1	2	17
White Stork	<i>Ciconia ciconia</i>	0	0	0	16	0	0	0	16
Secretarybird	<i>Sagittarius serpentarius</i>	0	7	1	1	6	0	0	15
Long-crested Eagle	<i>Lophaetus occipitalis</i>	7	2	0	2	2	0	0	13
Amur Falcon	<i>Falco amurensis</i>	6	0	0	1	0	0	0	7
Yellow-breasted Pipit	<i>Anthus chloris</i>	0	0	0	7	0	0	0	7
Lanner Falcon	<i>Falco biarmicus</i>	2	3	0	0	0	1	0	6
Black Sparrowhawk	<i>Accipiter melanoleucus</i>	0	3	0	1	0	0	1	5
Buff-streaked Chat	<i>Campicoloides bifasciatus</i>	0	0	0	3	0	0	2	5
African Harrier-Hawk	<i>Polyboroides typus</i>	0	0	1	2	0	1	0	4
Denham's Bustard	<i>Neotis denhami</i>	0	0	0	3	1	0	0	4
Marsh Owl	<i>Asio capensis</i>	0	1	3	0	0	0	0	4
Blue Crane	<i>Grus paradisea</i>	0	0	0	3	0	0	0	3
African Marsh Harrier	<i>Circus ranivorus</i>	0	0	0	2	0	0	0	2
Forest Buzzard	<i>Buteo trizonatus</i>	0	0	0	0	0	0	2	2
White-bellied Korhaan	<i>Eupodotis senegalensis</i>	2	0	0	0	0	0	0	2
African Fish Eagle	<i>Haliaeetus vocifer</i>	0	0	0	1	0	0	0	1
Brown Snake Eagle	<i>Circaetus cinereus</i>	1	0	0	0	0	0	0	1

Martial Eagle	<i>Polemaetus bellicosus</i>	0	1	0	0	0	0	0	1
Rufous-breasted Sparrowhawk	<i>Accipiter rufiventris</i>	0	0	0	1	0	0	0	1

5.9.7 VANTAGE POINT OBSERVATIONS

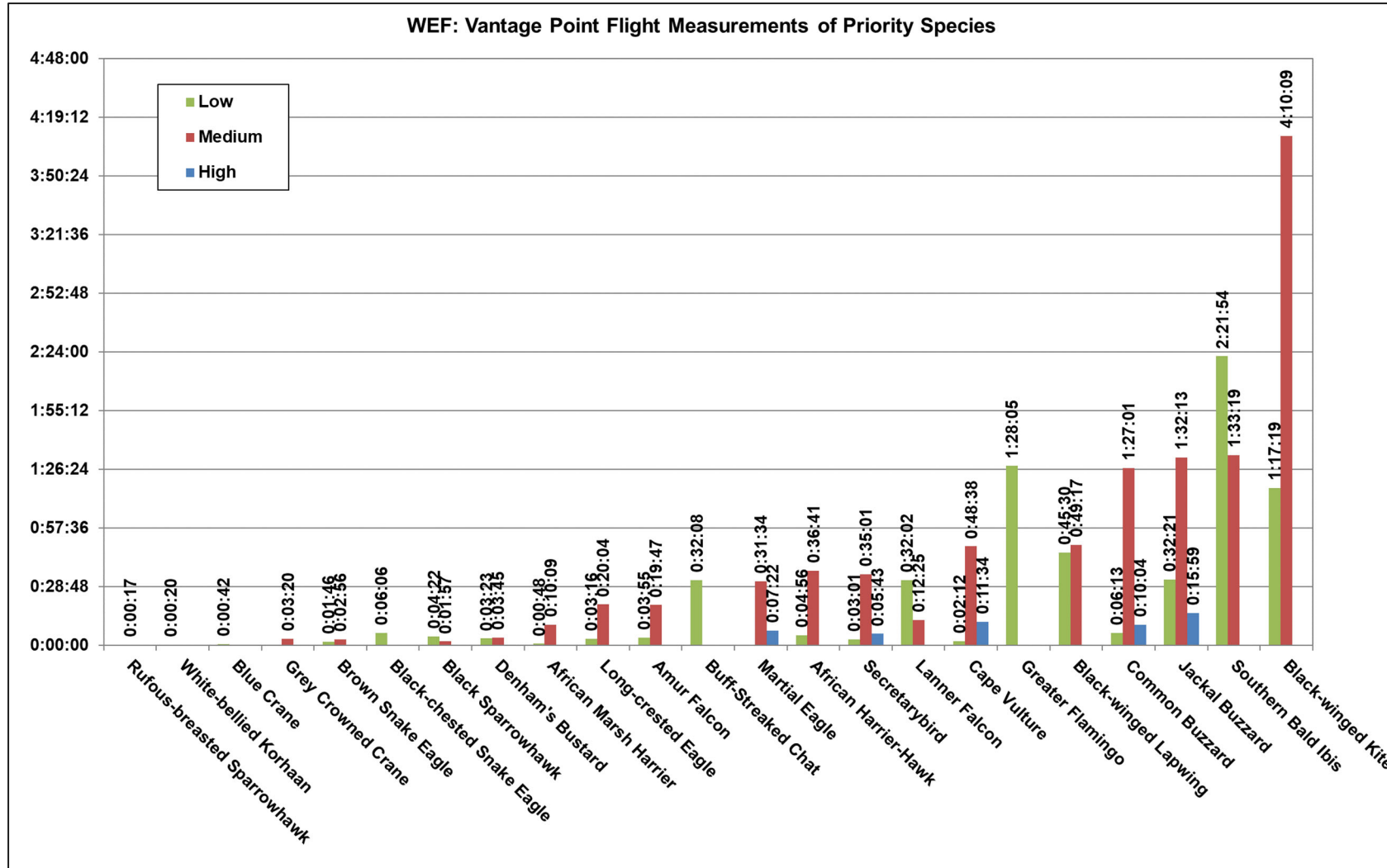
A total of 756 hours of Vantage Point watches were completed at nine vantage points, at the WEF Cluster (Rochdale, Emvelo, and Sheepmoor WEFs), to record flight patterns of priority species. In the seven sampling periods, the duration of priority species flights amounted to 22 hours, 19 minutes, and 34 seconds. A total of 488 individual flights were recorded. The passage rate for priority species was 0.65 birds/hour⁹. This amounts to about 8–9 birds per day.¹⁰ See Figure 5-12Error! Reference source not found. below for the duration of flights for each priority species¹¹.

⁹ A distinction was drawn between passages and flights. A passage may consist of several flights e.g. every time an individual bird changes height or mode of flight, this was recorded as an individual flight, although it still forms part of the same passage.

¹⁰ Assuming 13 hours daylight averaged over all four seasons.

¹¹ Flight duration was calculated by multiplying the flight time with the number of individuals in the flight e.g. if the flight time was 30 seconds and it contained two individuals, the flight duration was 30 seconds x 2 = 60 seconds.

Figure 5-12: Recorded Flight Times (in Hours: Minutes: Seconds) and Flight Altitudes of Priority Species (during the first seven surveys, excluding the additional five surveys conducted as part of the Martial Eagle monitoring)



5.9.8 FLIGHT RISK MODELLING

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.

We scripted and used R and python workflows to prepare, pre-process and analyse all predictor variables. Predictor variables represented various facets of topography, drainage, and vegetation productivity. Topographical features included ruggedness, drainage, TWI, and topographical relief, whilst aspects of vegetation productivity were derived from remote sensing indices. We utilised an Artificial Neural Network (ANN) predictive modelling workflow to train and develop the flight risk model (FRM). ANNs are capable of learning complex patterns and relationships in data, making them suitable for a wide range of classification problems. The modelling workflow included data partitioning, model training, optimization of algorithms and hyperparameters, and model testing and validation.

Model training suggested that certain topographical features related to slope and ruggedness increased flight risk. Undulating slopes, wide gorges and valleys, particularly less steep features such as back-slopes, foot-slopes, toe-slopes, and terrace/floodplains positively influence flight risk. Additionally, the presence and quantity of perch structures in the form of linear power infrastructure and/or woody vegetation positively influenced flight risk, along with cumulative and minimum vegetation productivity.

The raw predictive FRM surface was further processed to derive two risk classes, namely high and medium risk classes around the nest. The risk classes were derived by the quantity of observed high risk flights being accommodated by each respective risk envelope. The high-risk class encompassed approximately 79km², which is very comparable to the area covered by a 5km circular buffer (78.5km²).

5.9.9 SPATIAL DISTRIBUTION OF FLIGHTS OVER THE TURBINE AREA

Flight lines of priority species were recorded during Vantage Point watches to determine the flight activity and distribution of flight across the WEF site. The results after seven (7) surveys are presented in Figure 5-12

Additional monitoring (another five surveys) was conducted to gather additional data on the flight activity and distribution of flight across the WEF site, with particular focus given to Martial Eagles due to the active nest near the Project Site. The results after the additional five (5) surveys are presented in Figure 5-14 and Figure 5-13.

Figure 5-13: Recorded flight lines of priority species in and near the Emvelo WEF Project Site (seven surveys).

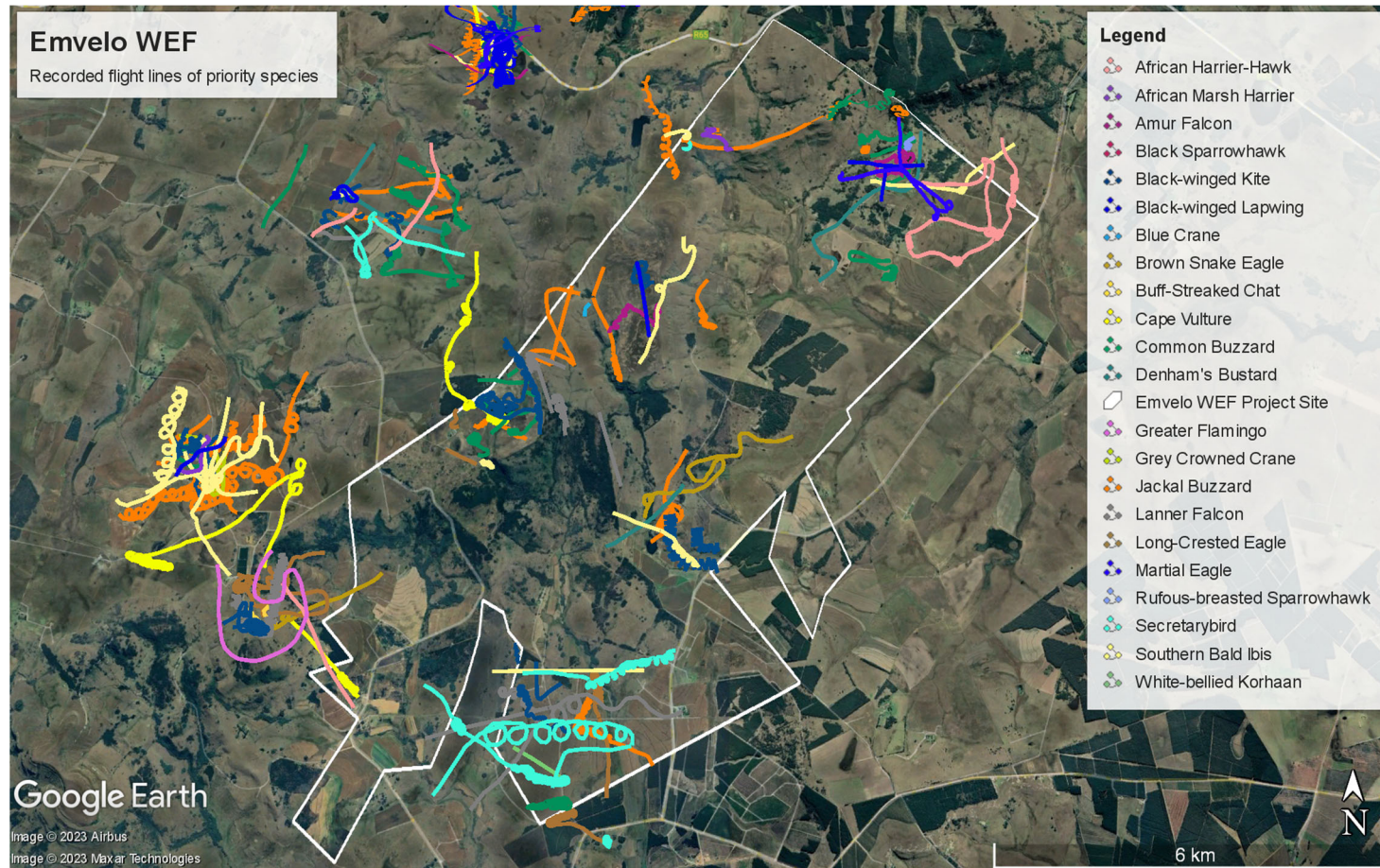


FIGURE 5-14: RECORDED FLIGHT LINES FOR MARTIAL EAGLE IN AND NEAR THE EMVELO WEF PROJECT SITE (ADDITIONAL FIVE SURVEYS).

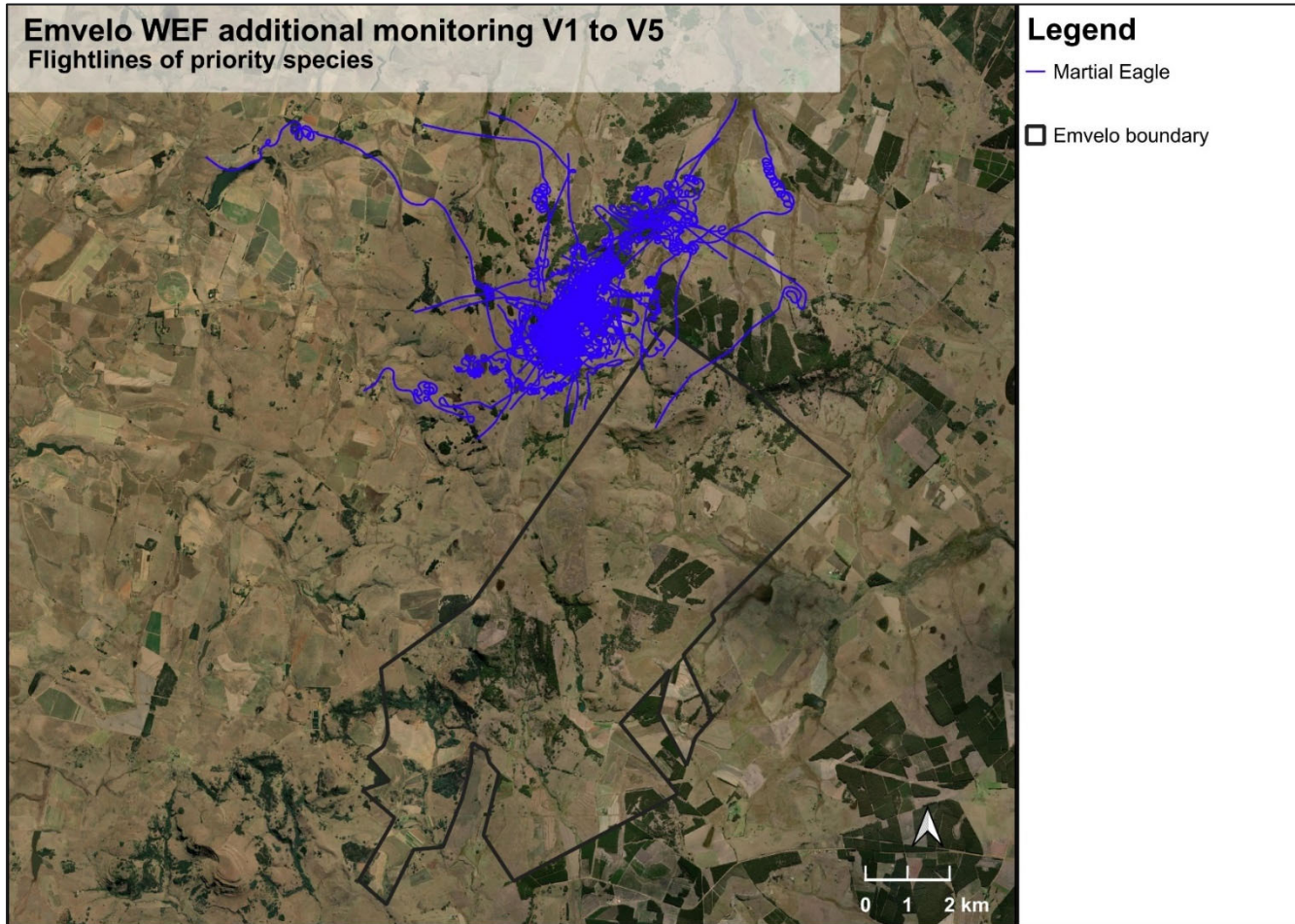
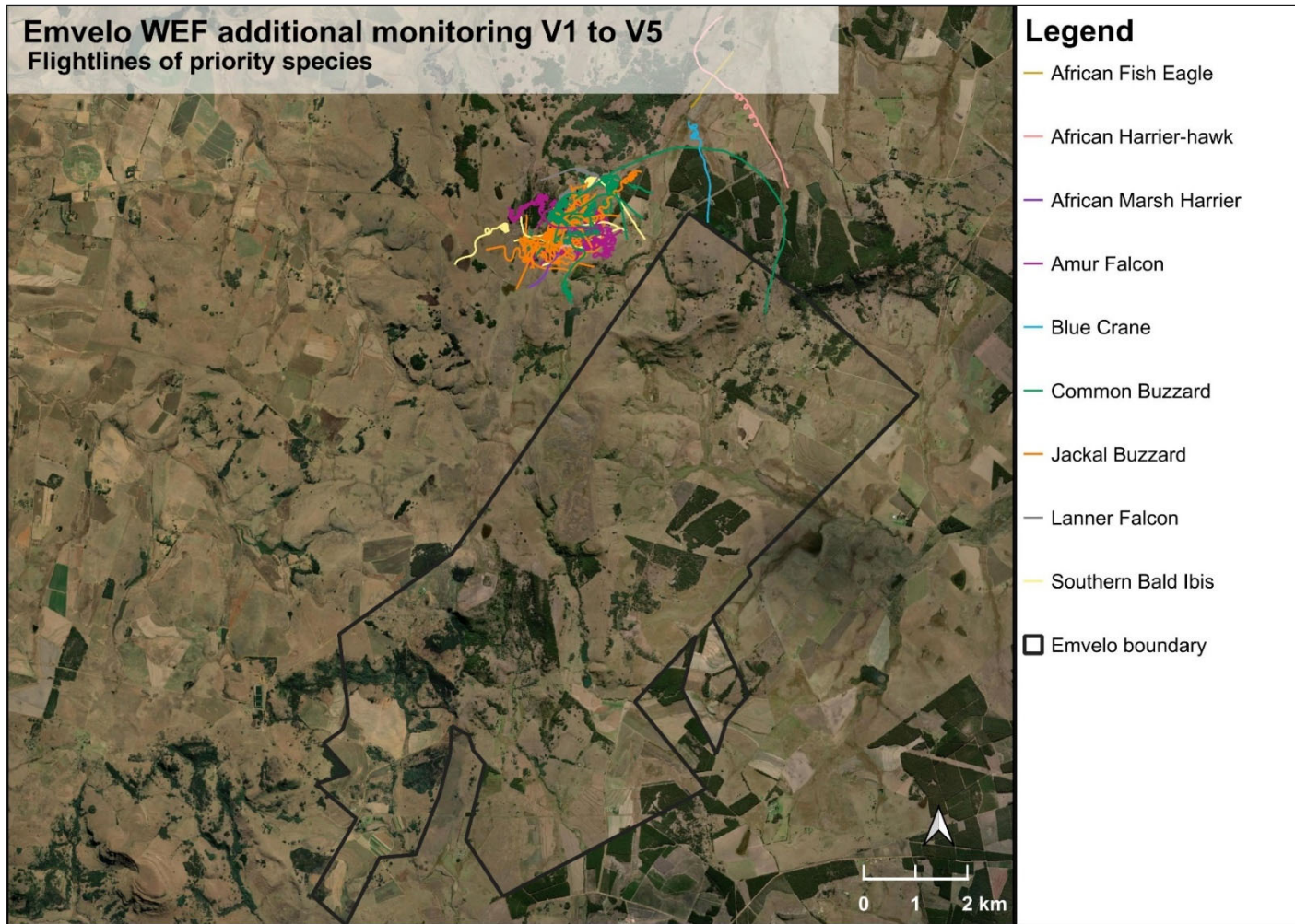


Figure 5-15: Recorded flight lines of all other priority species (excluding Martial Eagle) in and near the Emvelo WEF Project Site (additional five surveys)



5.9.10 ADDITIONAL MARTIAL EAGLE MONITORING

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

A total of 60 hours of Vantage Point watches were completed to record flight patterns of Martial Eagles as well as other priority species. Observations were primarily concentrated in the vicinity of the Martial Eagle nest, but where feasible, the eagles were followed to collect as much flight data in the landscape around the nest as possible.

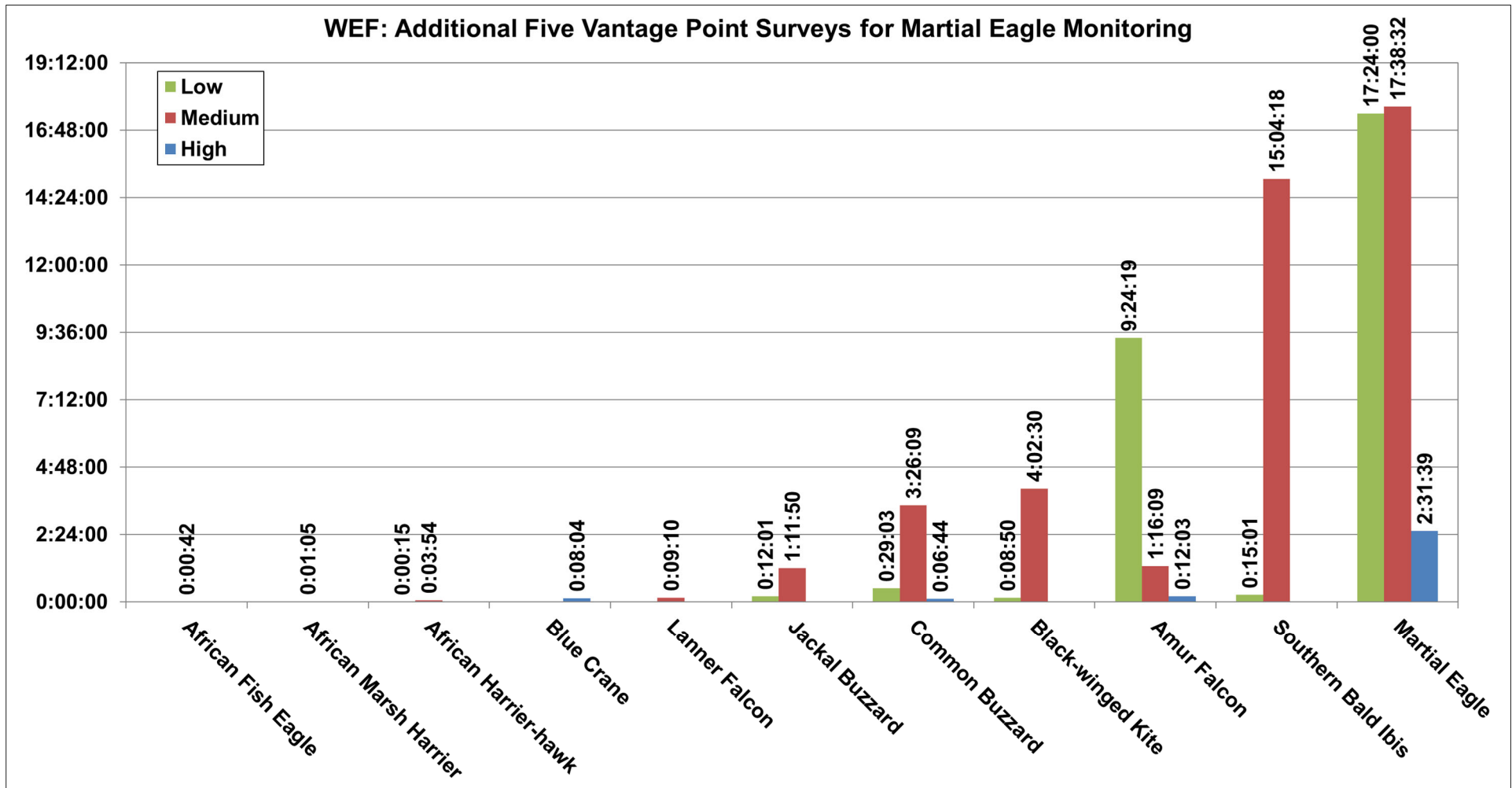
During the five sampling periods, the duration of priority species flights amounted to 73 hours, 46 minutes, and 18 seconds, with 42 hours, 54 minutes and 19 seconds (almost 60%) of the flights being at medium height (at turbine blade height). See Figure 5-16 below for the duration of flights for each priority species.

5.9.11 NO-GO AREAS

- A **2.5km No-Go zone** (for all infrastructure) around the identified Martial Eagle nest should be implemented and maintained to reduce the risk of collision mortality and displacement due to disturbance. However, the Martial Eagle nest turbine no-go buffer is currently being investigated further with detailed modeling and additional survey work. This investigation will form part of the EIA phase, and the final exclusion area/s (i.e. all infrastructure & turbine only etc.) confirmed during the EIA phase.
- 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.
- 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. This will be done to understand if the proposed development poses any risk to the species.

FIGURE 5-16: RECORDED FLIGHT TIMES (IN HOURS: MINUTES: SECONDS) AND FLIGHT ALTITUDES OF PRIORITY SPECIES.



5.10 BATS

Bat roosting sites in the PAOI are relatively limited and unlikely to support large congregations of bats, with no underground sites (e.g., caves, mines, sinkholes) known to be present. The closest known major bat roost is approximately 70 km north of the PAOI. Although occasional ridges and rocky outcrops are features of the landscape (Mucina and Rutherford 2006) these are not extensive. Bats are likely to roost in buildings associated with farmsteads within and bordering the AoI especially Cape Serotine and Egyptian Free-tailed Bat (Monadjem et al. 2020).

Trees growing at these farmsteads and elsewhere on site where they form clumps, could also provide roosting space for bats, as well as the limited rocky outcrops even though most are alien invasive species. Completed surveys of some buildings in the of the PAOI did not reveal the presence of roosting bats and as such were assessed as being of low relative suitability. However, these could be used by bats as night-roosts (locations used by bats to feed on captured prey, or to rest between foraging bouts) and should therefore still be considered, and avoided where possible, in the spatial planning.

Sensitive features in the PAOI at which bat foraging activity may be concentrated include farm buildings where they would forage for insects attracted to lighting (Rydell 1992, Jung and Kalko 2010), dams and wetland areas (Sirami et al. 2013), within and along the edge of woodland/tree patches, and over cultivated areas (Bohmann et al. 2011, Noer et al. 2012). Free-tailed bats (Molossidae) will fly at high altitudes, and their foraging habitat is essentially all airspaces (McCracken et al. 2008, Nguyen et al. 2019).

Based on current taxonomic information and bat occurrence data, 23 species could occur within the PAOI (Table 5-9). The majority have a low likelihood of occurrence however the potential suite of species includes 10 high risk species, including fruit bats (Pteropodiae) and free-tailed bats (Molossidae) which are vulnerable to wind energy impacts in South Africa (MacEwan 2016, Aronson 2022).

TABLE 5-9 BAT SPECIES POTENTIALLY OCCURRING WITHIN THE EMVELO WEF POAI

Common Name Species Name	Key Requirements* Habitat	Prob. Of Occurrence	Conservation Status		Wind Energy Risk ^o
			IUCN [†]	RSA [!]	
Natal Long-fingered bat <i>Miniopterus natalensis</i>	Temperate or subtropical species. Primarily in savannahs and grasslands. Roosts in caves, mines, and road culverts. Clutter- edge forager. Migratory.	Confirmed (4,420 passes)	LC/U	LC	High
Lessor Long-fingered bat <i>Miniopterus fraterculus</i>	Temperate species, associated with grasslands. Cave-dependant but also roosts in tunnels and mines. Habitat includes savannah	Moderate	LC/U	LC	High

	bushveld, moister mistbelt and coastal forest habitats. Clutter-edge forager. Migratory.				
Cape Serotine <i>Laephotis capensis</i>	Arid semi-desert, montane grassland, forests, savannah and shrubland. Roosts in vegetation and human-made structures. Clutter-edge forager.	Confirmed (45,125 passes)	LC/S	LC	High
Mauritian tomb bat <i>Taphozous mauritianus</i>	Savannah woodland preferring open habitat. Roosts on rock faces, the outer bark of trees or on the outer walls of buildings under the eaves of roofs. Forages in urban areas and over cultivation. Open-air forager.	High	LC/U	LC	High
Little Free-tailed bat <i>Chaerephon pumilus</i>	Semi-arid savannah, forested regions, woodland habitats. Roosts in narrow cracks in rock and trees but also in buildings. Open-air forager. Forages in urban areas and over cultivation.	Confirmed (1,216 passes)	LC/U	LC	High
Midas Free-tailed bat <i>Mops midas</i>	Hot low-lying savannah and woodland. Roosts in narrow cracks in rock and trees but also in buildings. Open-air forager.	Low	LC/D	LC	High
Egyptian Free-tailed bat <i>Tadarida aegyptiaca</i>	Desert, semi-arid scrub, savannah, grassland, and agricultural land. Roosts in rocky crevices, caves, vegetation, and human-made structures. Open-air forager.	Confirmed (18,842 passes)	LC/U	LC	High
Wahlberg's Epauletted fruit bat <i>Epomophorus wahlbergi</i>	Roost in dense foliage of large, leafy trees. Associated with forest and forest-edge habitats but will forage in urban environments.	Low	LC/S	LC	High
African Straw-coloured fruit bat <i>Eidolon helvum</i>	Non-breeding migrant in the PAOI.	Low	NT/D	LC	High

Egyptian Rousette <i>Rousettus aegyptiacus</i>	Distribution influenced by availability of suitable caves roosts.	Low	LC/S	LC	High
Temminck's <i>Myotis Myotis tricolor</i>	Montane forests, rainforests, coastal forests, savannah woodlands, arid thicket, and fynbos. Roosts communally in caves (and mines) and closely associated with mountainous terrain. Migratory. Clutter-edge forager.	Low	LC/U	LC	Medium-High
Welwitsch's <i>Myotis Myotis welwitschii</i>	Mainly open woodland and savannah but also high-altitude grassland, tropical dry forest, montane tropical moist forest, savannah and shrublands. Clutter-edge forager.	Low	LC/U	LC	Medium-High
Yellow-bellied house bat <i>Scotophilus dinganii</i>	Occurs throughout the Savannah Biome but avoids open habitats such as grasslands and Karoo scrub. Roosts in hollow trees and buildings. Clutter-edge forager.	Confirmed (165 passes)	LC/U	LC	Medium-High
Dusky Pipistrelle <i>Pipistrellus hesperidus</i>	Woody habitats, such as riparian vegetation and forest patches. Recorded roosting in narrow cracks in rocks and under the loose bark of dead trees. Clutter-edge forager.	Low	LC/U	LC	Medium-High
Rusty Pipistrelle <i>Pipistrellus rusticus</i>	Savannah woodland and associated with open water bodies. Roosts in trees and old buildings. Clutter-edge forager.	Low	LC/U	LC	Medium-High
Long-tailed Serotine <i>Eptesicus hottentotus</i>	Montane grasslands, marshland and well-wooded riverbanks, mountainous terrain near water. Roosts in caves, mines, and rocky crevices. Clutter-edge forager.	Confirmed (239 passes)	LC/U	LC	Medium

Egyptian Slit-faced bat <i>Nycteris thebaica</i>	Savannah, desert, arid rocky areas, and riparian strips. Gregarious and roosts in caves but also in mine adits, Aardvark holes, rock crevices, road culverts, roofs, and hollow trees. Clutter forager.	Medium	LC/U	LC	Low
Geoffroy's Horseshoe bat <i>Rhinolophus clivosus</i>	Savannah woodland, shrubland, dry, riparian forest, open grasslands, and semi- desert. Roosts in caves, rock crevices, disused mines, hollow baobabs, and buildings. Clutter forager.	Medium	LC/U	LC	Low
Bushveld Horseshoe bat <i>Rhinolophus simulator</i>	Occurs in caves within areas of moist savannah, adjacent to rivers and savannah woodland, montane habitats, and coastal mosaics. Commonly associated with riparian forest and along wooded drainage lines. Roosts in caves and mines. Clutter forager.	Medium	LC/D	LC	Low
Blasius's Horseshoe bat <i>Rhinolophus blasii</i>	Savannah woodlands and are dependent on the availability of daylight roosting sites such as caves, mines, or boulder piles. Clutter forager.	Low	LC/D	NT	Low
Darling's Horseshoe bat <i>Rhinolophus darlingi</i>	Mesic woodland savannahs. Roosts in caves, boulder piles, mines, culverts, large hollow trees and disused buildings. Clutter forager.	Low	LC/U	LC	Low
Sundevall's Leaf-nosed bat <i>Hipposideros caffer</i>	Savannah, bushveld and/or coastal forests, near to rivers and other water sources. Roosts in caves, sinkholes, rock fissures, hollow trees, mines, and culverts. Clutter forager.	Low	LC/D	LC	Low
Percival's Short-eared Trident bat <i>Cloeotis percivali</i>	Savannah and woodland areas. Roosts in caves and mine tunnels. Clutter forager.	Low	LC/U	EN	Low

*Child et al. (2016), *Monadjem et al. (2020); ¹ Child et al. (2016); ¹ IUCN (2021); ^o MacEwan et al. (2020b)

5.11 SOCIO-ECONOMIC

The study area is located within the MM within the Mpumalanga Province. The MM is one of the seven Local Municipalities that make up the Gert Sibande District Municipality (GSDM).

Three national highways, namely the N2, N11 and the N17 intersect at Ermelo. The N2 freeway connects Ermelo with Richards Bay on the KwaZulu Natal coastline. The N11 South connects the town to Newcastle to the south and then onto the Ladysmith before linking up with the N3 to Durban. The N11 north connects to Middelburg and the N4 freeway west to Pretoria. The N17 West connects the town to the southern suburbs of Johannesburg and N17 East to eSwatini.

Ermelo is also a major railway junction between Mpumalanga and KwaZulu-Natal. The rail junction connects to Machadodorp which is on the Pretoria and Maputo railway line. The town also lies on the Richards Bay railway line that connects the Mpumalanga coalfields with the export Port of Richards Bay on the Indian Ocean. The N2 and Richards Bay railway line run to the south of the study area. The proposed Emvelo WEF project is located to the north of the N2 and south of the R65. The grid connections run in an east west direction linking up with the Camden substation located adjacent to Eskom's Camden Power Station, located ~ 31 km to the west of the study area.

Construction of the 1,600 MW power station commenced in November/December 1962 and the first turbo-generator was commissioned in April 1967. The last of the eight units was commissioned in 1969. The Camden Power station became the starting point of the national power grid, consisting of a series of 400 kV lines which today interconnect the entire country. The power station has six 111.86 m high cooling towers and four 154 chimney (smoke stacks) that served 8 boilers. Between 1990 and 2006 the station was mothballed, but South Africa's energy crisis in the early 21st century prompted Eskom to recommission the station, starting with unit 6 in July 2005 and completing with unit 1 in July 2008. The development of the Camden Power station also involved the construction of the village of Camden, located ~ 1.3km to the north of the power station.

As previously stated, the study area is not located within a designated Renewable Energy Development Zone (REDZ). No operational REFs renewable energy facilities are currently located within significant proximity of the site. The DFF&E's Renewable Energy applications interactive viewer (last updated February 2022) indicates no historic applications within a 35 km radius of the site. In addition to the three WEFs proposed by Mulilo, two WEFs and a Solar Energy Facility area proposed in the vicinity of the Camden Power Station (Enertrag).

5.11.1 POPULATION

The population of the MM in 2016 was 164 608 (Community Household Survey 2016). Of this total, 35.4% were under the age of 18, 60.4% were between 18 and 64, and the remaining 4.1% were 65 and older. The MM therefore had a high percentage of the population that fall within the economically active group of 18-65. The figures are higher

than the figures for the GSDM and Mpumalanga (57.7% and 56.6% respectively). This is likely to be due to the employment opportunities associated with the mining and manufacturing activities in the MM.

The dependency ratio is the ratio of non-economically active dependents (usually people younger than 15 or older than 64) to the working age population group (15-64). The higher the dependency ratio the larger the percentage of the population dependent on the economically active age group. This in turn translates to reduced revenue for local authorities to meet the growing demand for services. The traditional approach is based on people younger than 15 or older than 64. The information provided provides information for the age group under 18. The total number of people falling within this age group will therefore be higher than the 0-15 age group. However, most people between the age of 15 and 17 are not economically active (i.e., they are likely to be at school).

Using information on people under the age of 18 is therefore likely to represent a more accurate reflection of the dependency ratio. Based on these figures, the dependency ratios for the MM, the GSDM and Mpumalanga in 2016 were 65.4%, 73.5% and 77% respectively. The high dependency ratios reflect the limited employment and economic opportunities in the area and the province. As indicated above, a high dependency ratio also places pressure on local authorities in terms of service delivery.

In terms of race groups, Black Africans made up 91.6% of the population in the MM, followed by Whites, 6.9% and Asian or Indians, 0.9%, and Coloureds, 0.6%. These figures for the GSDM are similar. The main first language spoken in the MM is isizulu, 79.1%, followed by Siswati, 7.3% and Afrikaans, 6.2%.

5.11.2 HOUSEHOLDS AND HOUSE TYPES

The total number of households in the MM in 2016 was 51 090, which constituted approximately 20% of the total number of households in the GSDM. Of these 66.2% were formal houses, 9.1% flats in backyards, 6.6% traditional dwellings, and 9.4% shacks or informal dwellings. The figures for the GSDM were 67.2%, 4.6%, 6.7% and 13.4% respectively. Majority of dwellings in the MM are therefore formal structures. A relatively large percentage of the properties in the MM (43.3%), while 5.9% were owned and in the process of being paid off. 22.1% of the households rented their properties, while 10.6% occupied their properties rent free. The rent-free figure is likely to be associated with farm workers. The relatively high number of properties that are owned and or in the process of being paid off reflects a relatively stable and established community.

In terms of household heads, approximately 38.9% of the households in the MM and 39.1% of the households in the GSDM were headed by women. These figures are similar to the provincial figure of 39.71%. The high percentage of households headed by women reflects the likelihood that the men have left the area in search of employment opportunities in Gauteng. Women headed households tend to be more vulnerable.

5.11.3 HOUSEHOLD INCOME

Based on the data from the 2011 Census, 12.6% of the population of the MM had no formal income, 4.1% earned less than R 4 800, 7.1% earned between R 5 000 and R 10 000 per

annum, 17.7% between R 10 000 and R 20 000 per annum and 20.9% between R 20 000 and 40 000 per annum (2016). The poverty gap indicator produced by the World Bank Development Research Group measures poverty using information from household per capita income/consumption. This indicator illustrates the average shortfall of the total population from the poverty line. This measurement is used to reflect the intensity of poverty, which is based on living on less than R3 200 per month for an average sized household (~ 40 000 per annum). Based on this measure, in the region of 62.4% of the households in the MM and 65.2% in the GSDM live close to or below the poverty line. The low-income levels reflect the rural nature of the local economy and the limited formal employment opportunities outside in the urban areas. This is also reflected in the high unemployment rates. The low-income levels are a major concern given that an increasing number of individuals and households are likely to be dependent on social grants. The low-income levels also result in reduced spending in the local economy and less tax and rates revenue for the MM. This in turn impacts on the ability of the MM to maintain and provide services.

Household income levels are likely to have been impacted by the COVID-19 pandemic. The number of households in the MM and GSDM that live close to or below the poverty line is likely to have increased over the last 18 months. This, coupled with the high dependency ratio, is a major cause of concern for the area.

5.11.4 EMPLOYMENT

The official unemployment rate in the MM in 2016 was 15.6%, while 42.6% were employed, and 36.4% were regarded as not economically active. However, the COVID-19 pandemic is likely to have resulted in an increase in unemployment rates in both the ULM and Ward 3. Recent figures released by Stats South Africa also indicate that South Africa's unemployment rate is in the region of 36%, the highest formal unemployment rate in the world.

5.11.5 EDUCATION

In terms of education levels, the percentage of the population over 20 years of age in the MM and GSDM with no schooling was 10.6% (2016), compared to 10.8% and 11.3% for the GSDM and Mpumalanga Cape Province, respectively. The percentage of the population over the age of 20 with matric was 34.12%, compared to 34.3% and 36.1% for the GSDM and Mpumalanga Cape Province. The education levels for the MM are therefore similar to the DM and Provincial figures.

5.12 HERITAGE, ARCHAEOLOGY AND PALAEOLOGY

According to a desktop PIA undertaken by Alan Smith Consulting (2023) for the proposed Emvelo WEF:

"The SAHRIS Palaeosensitivity Map ... considers the Vryheid Formation as a Very High Palaeosensitivity Zone... In practise, no vertebrate fossils have been recorded from the Vryheid Formation in this area, however invertebrate trace fossils are common (Tavener Smith et al, 1989; Mason and Christie, 1985; Hastie et al., 2019), but these are of no particular value, in this area.

Groenewald (2018) pointed out that the aquatic marine reptile, Mesosaurus (earliest known reptile from the Karoo Basin), as well as the fish, Palaeoniscus capensis, have been recorded in the Whitehill Formation in the southern part of the basin (MacRae, 1999), which is correlated with the Vryheid Formation... The Vryheid Formation in this area has its provenance in the north (Tavener Smith, 1982). The Whitehill Formation source is in the south. There is also a southerly source to the lower Vryheid Formation (Hastie et al., 2019), but this regime does not extend north of Vryheid. The Vryheid Formation is generally believed to be marine (Hastie et al., 2019) but no significant fossils have been discovered. The lack of vertebrate fossils is problematic. In the marine case it may be due to the water being heavily silted but this is speculation."

The Emvelo WEF is mostly non-fossiliferous Karoo Dolerite. The 1969 topographical map indicated that there were several settlements, or homesteads, kraals and farm buildings along the route.

The black wattle woodlots have greatly expanded and covered many of the settlements from the desktop study. There was no evidence of these settlements where access through the woodlots was possible. The Black Wattle has literally destroyed the sites and any potential graves. The situation is exacerbated by the current program of removing the black wattle being removed by bulldozers in some areas.

5.13 VISUAL / LANDSCAPE

The Project site is approximately 28 km east of Ermelo and 37km west of Amsterdam in Mpumalanga. The study area was determined as the site provided by the Developer, and a 40 km buffer zone around it determined by the visual specialist as the maximum area of potential impact. The visibility of the turbines would be insignificant beyond this point.

The 40 km buffer zone has also been established for the study, as it may be possible, that when viewed from an elevated position or when the turbines are silhouetted on a ridgeline, the structures could be visible depending on light and atmospheric conditions. The other consideration is the effect of flashing red lights on top of the turbines at night, which would be visible from great distances against what is currently a relatively dark rural sky.

It is anticipated that the potential visual impact should not extend beyond 5km and for this reason the visual specialist has limited the study area to 5km either side of the centre line of the proposed corridors.

The study area consists of a landscape that varies from relatively flat with wide open grasslands and agricultural lands, to rolling with low ridges, valleys, ridges, escarpments, and flat-topped hills. In the east the landscape drops down to the edge of the Mpumalanga escarpment with steeper valleys and ridges. The study area comprises gently undulating land originally covered with Eastern Highland Grassveld with Wakkerstroom Montane Grassland on the eastern edge (Mucina and Rutherford 2006:460). Most of the area is not often ploughed due to the clay soils. However, the very nature of the original vegetation in this area is low growing and visually uniform which does not provide much visual screening. Although the grassland vegetation is not overly sensitive to the development it does not assist in reducing the visual expose of the turbines. The vegetation is typical of the Highveld ambience, and it is this together with the topography which provides the Highveld sense of place.

The area in the northern sector of the study area exhibits a high aesthetic appeal imparted by the rolling topography, farmsteads, streams and rivers, dams and lakes, and farmlands.

The area further to the east forms the edge of the upper reaches of the escarpment and is well forested with timber plantations which may assist in screening the visibility of the turbines (i.e., visual absorption capacity (VAC) is relatively high for the eastern sections of the study area.

The landscape in the west and southwestern parts of the study area are visually intruded by existing power lines, views of the Camden Power Station and settlements such as Sheepmoor, which do not have the aesthetic appeal of the north. Although the hills to the far south of the N2 exert a reasonably powerful sense of place.

The study area is well populated¹², especially in the central/south which was borne out by the site visit.

The study area's visual quality (resource) can be categorised into five landscape character zones. The area north of the R65 exhibits a high visual quality due to the rural agricultural ambience. The area to the east is more diverse with a mixture of grasslands, hills and valleys and timber production. The area to the south of the R65 to the N2 is a mix of farming, grazing settlements roads, power lines and game farms. In the far south and southwest are grassland covered rolling hills that reach elevations of over 1,700 m above sea level.

The area north of the R65 exhibits a high visual quality due to the rural agricultural ambience and presence of water bodies (dams, vleis, pans and rivers) and the Chrissiesmeer Protected Environment.

5.14 TRAFFIC AND TRANSPORTATION

The general location of the sites is made up of farmlands with rural unpaved Class 4 Provincial roads such as D532 and D1299 supporting movement between the various farms, as well as access to some of these land parcel.

¹² It is noted that the potential receptor locations have been identified by building locations on the Surveyor General data base. Not all these building would necessary be of a residential (sensitive viewing location) nature. During the assessment stage this would be verified.

The N2 National Road is a paved/tarred single carriageway (undivided road) with a single lane per direction. It serves as a major primary east-west link between the towns of Ermelo and Piet Retief, which are situated to the west and east of the proposed development, respectively.

The R65 is a paved/tarred single carriageway (undivided road) with a single lane per direction. This road is a primary east-west regional road connecting the towns of Amsterdam and Ermelo, which are situated to the east and west of the proposed development, respectively.

The proposed Emvelo WEF development site is in a rural area where the predominant activity includes livestock farming, crop farming and logging. These activities are expected to continue during the construction, operation, and eventual decommissioning of the site.

6. ALTERNATIVES ASSESSMENT

In accordance with the requirements of Appendix 1 of the 2014 EIA Regulations (as amended), an assessment report must contain consideration of all alternatives, which can include activity alternatives, site alternatives, location alternatives and the “No Development” alternative. At a minimum, this chapter must address:

- The consideration of the No Development alternative as a baseline scenario;
- A comparison of reasonable and feasible selected alternatives; and
- The provision of reasons for the elimination of an alternative.

Alternatives are required to be assessed in terms of social, biophysical, economic and technical factors.

When assessing alternatives, they should be “practical”, “feasible”, “relevant”, “reasonable” and “viable”, and I&APs should be given the opportunity to provide input into the process of formulating alternatives. In this instance, this chapter provides a brief overview of the alternatives that have been considered for the scoping phase offer this development.

6.1 THE NO DEVELOPMENT SCENARIO OR “NO-GO OPTION”

This scenario assumes that the proposed development does not proceed. It is equivalent to the future baseline scenario in the absence of the proposed development. Relative to the proposed development, the implications of this scenario include:

- The land-use remains agricultural, with no further benefits derived from the implementation of a complementary land use;
- There is no change to the current landscape or environmental baseline;
- No additional electricity will be generated on-site or supplied through means of renewable energy resources. This would have negative implications for the South African government in achieving its proposed renewable energy target, given the need for increased generation;
- There would be a lost opportunity for South Africa to generate renewable energy. This would represent a significant negative social cost;
- There is no opportunity for additional employment (permanent or temporary) in the local area where job creation is identified as a key priority; and
- The national and local economic benefits associated with the proposed project’s REIPPPP commitments and broader benefits would not be realised.

The purpose of the proposed development is to generate renewable electricity and export this to the national grid. Other socio-economic and environmental benefits will result from the proposed development such as:

- Reduced air pollution emissions - burning fossil fuels generates CO₂ emissions which contributes to global warming. Emissions of sulphurous and nitrous oxides are produced which are hazardous to human health and impact on ecosystem stability.
- Water resource saving – conventional coal-fired power stations use large quantities of water during their cooling processes. WEFs require limited amounts of water during

construction and a minimal amount of water during operation. As a water stressed country, South Africa needs to be conserving such resources wherever possible.

- Improved energy security – renewables can be deployed in a decentralised way close to consumers, improving grid strength while reducing expensive transmission and distribution losses. Renewable energy projects contribute to a diverse energy portfolio.
- Exploit significant natural renewable energy resources – biomass, solar and wind resources remain largely unexploited.
- Sustainable energy solutions – the uptake of renewable energy technology addresses the country's energy needs, generation of electricity to meet growing demands in a manner which is sustainable for future generations.
- Employment creation and other local economic benefits associated with support for a new industry in the South African economy.

The 'No Development' alternative would not assist the government in addressing climate change, energy security and economic development.

If the project were not implemented, then the site would stay as it currently is. Although the heritage impacts with implementation would be greater than the existing impacts, the loss of socio-economic benefits is more significant and suggests that the No-Go option is less desirable in heritage terms.

The No-Development option would represent a lost opportunity for South Africa to improve energy security and supplement its current energy needs with clean, renewable energy. Given South Africa's current energy security challenges and its position as one of the highest per capita producers of carbon emissions in the world, this would represent a significant negative social cost. The proposed WEF should be developed, and the mitigation and enhancement measures identified in the EIA should be implemented.

No other location (development areas) alternatives are being considered. Renewable Energy (RE) development in South Africa is highly desirable from a social, environmental and development point of view and a wind energy installation is more suitable for the site due to the high wind resource.

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

6.2 SITE SELECTION

The Applicant identified the Emvelo WEF after conducting a series of pre-feasibility assessments by considering aspects such as climatic conditions (wind speed databases, pre-dominant wind directions), grid connection scenarios, site geography and topography, avifauna nest survey to identify restrictive no go buffers, ecological features and site accessibility.

Feasibility studies undertaken by the Project Applicant indicated that the Emvelo WEF site is suitable to develop and operate a wind farm as it satisfies the following criteria:

- Feasibility of access for wind turbine delivery as the site is easily accessible from the national road;
- Viable wind resource;
- The surrounding area is not densely populated;
- The proposed site is largely agricultural land;
- Willingness of landowner to host a wind farm on their property; and
- No environmental fatal flaws identified in the screening assessment.

The unique features of this site eliminates the possibility of alternatives with similar site conditions. Alternatives are restricted to on-site aspects such as turbine footprints and layouts, roads and related infrastructure options.

At this phase, it was concluded, based on available information, that the Emvelo WEF site is suitable for the construction and operation of the WEF.

6.3 DESIGN EVOLUTION ALTERNATIVES

Following the selection of a suitable site, consideration is given to the design of the WEF. It is important that wind turbines are sited in the optimum position to maximise the wind energy yield whilst minimising environmental impacts as far as possible.

Information collated during the scoping phase will be used to inform the design of the WEF progressively. Best practice advises that the EIA should be an iterative process rather than a post design environmental appraisal. In this way, the findings of the technical environmental studies will be used to inform the design of a development.

This approach will be adopted with respect to this proposed development, and where potentially significant impacts are identified, efforts will be made to avoid these through evolving the design of the proposed development. This will be referred to as mitigation to be embedded in the layout and design, or 'embedded mitigation'.

A preliminary layout was produced showing suggested locations of wind farm turbines on the site. This layout will be adjusted, based on the initial scoping assessment and specialists' findings. This adjusted layout will be called the 'preferred layout' and will be assessed in further detail during the EIA Phase.

6.4 TECHNOLOGY ALTERNATIVES

Additional renewable energy technologies include hydro-electric power, photovoltaic solar or concentrated solar power. The site itself has no resource for hydro-electricity. Solar electricity generation would require a much greater infrastructure footprint to generate the equivalent energy of the proposed WEF.

Based on the site's physical characteristics and existing land uses, the renewable energy technology best suited to the site, considering the potential environmental impacts, is a WEF, however the specific design at the site should be informed by the EIA process.

Various wind turbine designs and layouts will be considered for the site to maximise the electricity generation capacity and efficiency, whilst considering environmental constraints.

One alternative for the placement of the laydown area and on-site substation were provided to specialists. The placement of either of these alternatives is acceptable from the specialist perspective. According to the Bat specialist, the Preferred Laydown Area and the Alternative Laydown Area are both located within no-go areas and must be relocated.

As the sites are in a similar location, particularly in terms of the major road network, the main differentiation between sites from a transportation perspective was in terms of local access and available infrastructure. The Substation site was evaluated; however, grid connection and integration lines were not evaluated from a transportation perspective as the effects of these do not have significant impacts on the transportation related assessment criteria.

7. DESCRIPTION OF PREFERRED ALTERNATIVE

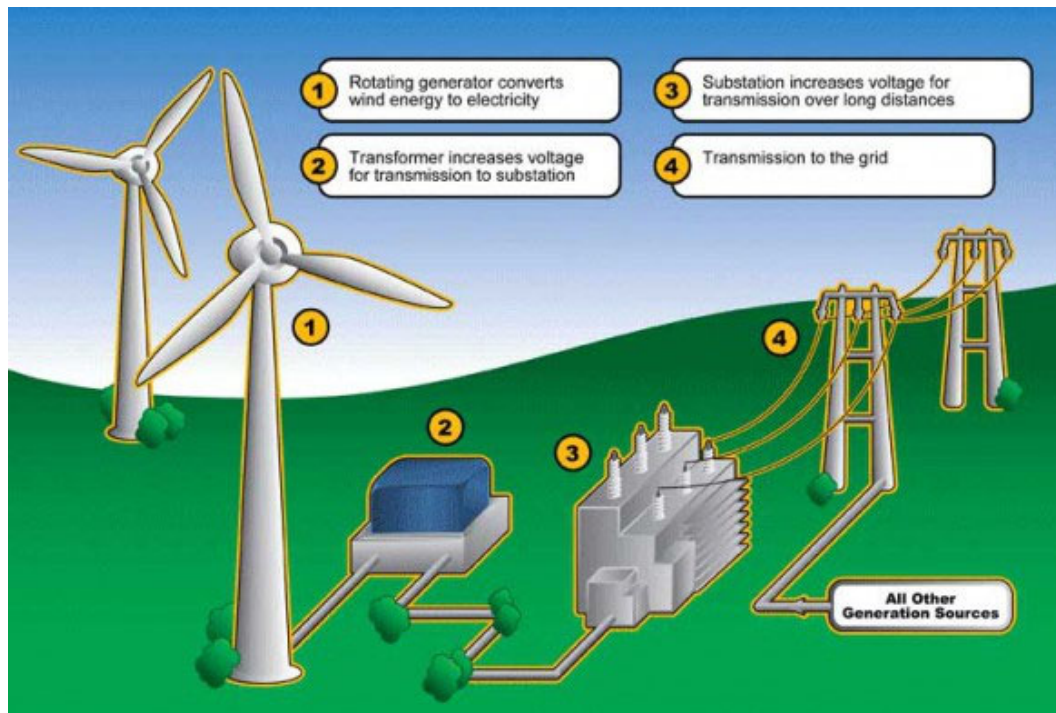
The proposed development will consist of:

- Up to 45 wind turbines, with a maximum hub height of up to 150 m and a rotor diameter of up to 220 m;
- Temporary laydown areas which will accommodate the crane platforms and hardstand laydown area;
- Battery Energy Storage System (BESS);
- Cabling between the turbines, to be laid underground where practical and feasible;
- One on-site substation with capacity of up to 132 kV to facilitate the connection between the wind farm and the electricity grid;
- Internal roads (existing roads will be upgraded wherever possible);
- A temporary site camp establishment and concrete batching;
- O&M buildings; and
- Total permanent development footprint of up to 180 ha after rehabilitation.

7.1 WIND ENERGY FACILITY COMPONENTS

The WEF will comprise components described below. It should be noted that as the design of the proposed development is not yet finalised, all dimensions are maximums as is required by the EIA process. The final design may include infrastructure which is of equal or less than dimensions to those stated below, but not more than.

FIGURE 7-1: SIMPLE ILLUSTRATION OF A TYPICAL WIND ENERGY FACILITY OPERATING SEQUENCE



7.1.1 WIND TURBINE GENERATORS AND HARDSTAND AREAS

The proposed WEF will comprise of up to 45 turbines.

At this stage, it is envisaged that the turbines will each have a capacity to generate up to 8 MW of power. The turbines will be three-bladed horizontal-axis design with a hub height of up to 150 m, a rotor diameter of up to 220 m and a blade length of up to 110 m. The exact turbine model has not yet been selected and will be identified based on the wind resource distribution, technical, commercial and site-specific considerations.

The turbine rotor speed will vary according to the energy available in the wind, the wind speed. The turbines will generate power in wind speeds between approximately 3 metres per second (m/s) and 28 m/s (depending on the model of turbine) with maximum power output usually achieved at wind speeds of around 10 - 12 m/s. On average, wind speeds greater than approximately 25 m/s the turbines will automatically turn the angle of the blade to reduce energy capture (this is known as 'feathering') and stop turning to prevent damage.

Each turbine will have a circular foundation with a diameter of up to 32 m and this will be placed alongside the 45 m wide hardstand resulting in an area of about 32 m x 45 m that will be permanently disturbed for the turbine foundation. The combined permanent footprint for the turbine foundations will be approximately 5.5 ha.

The permanent footprint for turbine hardstands will be approximately 0.75 ha.

Each turbine will have a blade hardstand of 80 m x 45 m. The temporary footprint for turbine hardstands will be approximately 13.7 ha.

FIGURE 7-2: AN ILLUSTRATION OF TYPICAL COMPONENTS OF A WIND TURBINE GENERATOR (WTG)

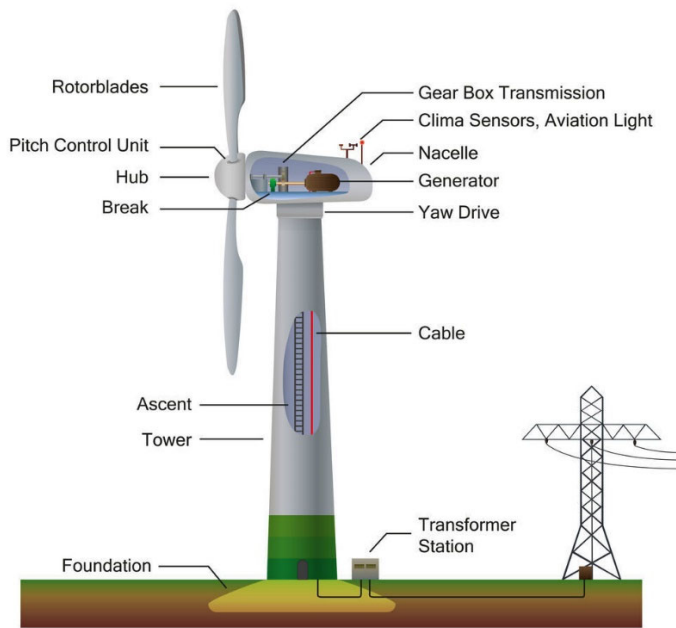


FIGURE 7-3: THE INSIDE OPERATION OF A TYPICAL WIND TURBINE

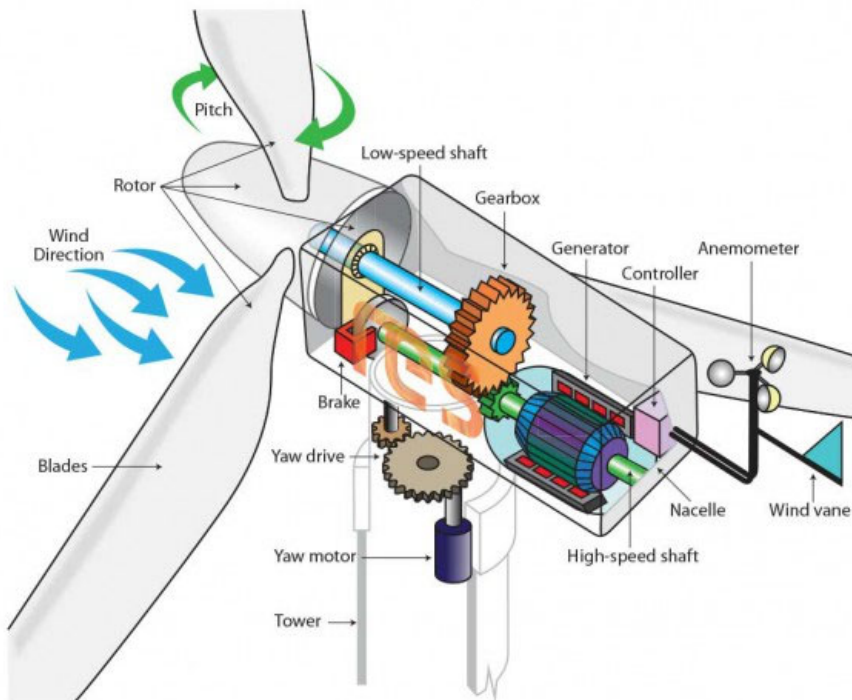


FIGURE 7-4: ILLUSTRATION OF A TYPICAL TURBINE HARDSTAND AND LAYDOWN AREA



7.1.2 ELECTRICAL CABLING AND ON-SITE SUBSTATION

It is proposed that an on-site substation with a capacity up to 132 kV and an up to 132 kV Overhead Powerline (OHPL) of approximately 30 km (300 m corridor) in distance, traversing 18 land parcels, be constructed to connect the proposed WEF to the Eskom Uitkoms Substation.

7.1.3 BATTERY ENERGY STORAGE SYSTEM

The substation area will also house the BESS. The function of the BESS will be to store peak kinetic energy produced by the Emvelo WEF for use in the following ways:

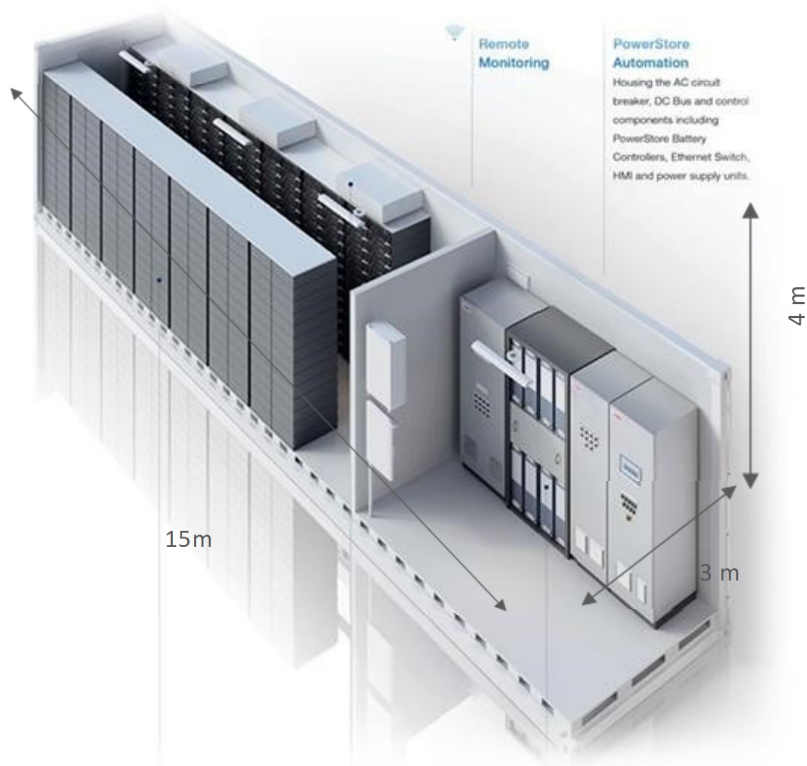
- To power the operation of the proposed development when the national grid is strained by high (or peak) demand, often resulting in load-shedding;
- To provide excess generation to the national grid which will assist with stabilizing electricity supply during peaks and troughs of demand; and
- To reduce the impact caused by the variability and limited predictability of wind generation.

The preferred battery technology being considered would be Solid-State, Lithium Ion (Li-Ion) batteries, which consists of multiple battery cells that are assembled together to form module. Each cell contains a positive electrode, a negative electrode and an electrolyte. A module may consist of thousands of cells working in conjunction. Modules are normally packaged inside containers (similar to shipping containers) and these containers are delivered pre-assembled to the project site.

The containers will have approximate dimension ranges of: height 2 m - 5 m, width 1.5 m - 3 m, length 7 m - 20 m. The containers are raised slightly off the ground and are banded to prevent possible environmental damage resulting from any equipment malfunction. The proposed development is considering the option of stacking these containers vertically to a maximum of two container layers or a height of 8 m.

The BESS storage capacity will be up to 1000 (MWh) with up to four hours of storage and will be placed on a concrete footprint of up to 5 ha. The BESS will be in close proximity to the on-site substation, will be fenced off and will be linked to the substation via internal cables and will not have any additional office / operation / maintenance infrastructure as those of the substation.

FIGURE 7-5: TYPICAL REPRESENTATION OF HOW BATTERIES AND BATTERY MODULES ARE HOUSED AND ASSEMBLED



This proposed development will have similar project components and will be designed in a similar manner.

FIGURE 7-6: SOLARCITY'S TESLA BATTERY STORAGE FACILITY, HAWAII.



FIGURE 7-7: A STOCK IMAGE OF A SIMILAR DEVELOPMENT WITH AN ON-SITE SUBSTATION AND BESS



7.1.4 LAYDOWN AREAS AND SITE OFFICES

Individual turbine temporary laydown areas including crane boom laydown areas, blade laydown areas and other potential temporary areas will be up to a maximum 36 ha.

The construction laydown area will be located within the permanent footprint area of up to 180 ha.

7.1.5 INTERNAL SITE ACCESS ROADS

The majority of the access road will follow existing, gravel farm roads that may require widening up to 15 m (inclusive of storm water infrastructure). Where new sections of road need to be constructed (lengthened), this will be gravel/hard surfaced access road and only tarred if necessary.

A network of gravel internal access roads and a perimeter road (cumulatively up to 33 km in length), each with a width of up to ~ 12 m, will be constructed to provide access to the various components of the WEF.

Site access is proposed directly off an unnamed gravel road surrounding the site; however, this will be confirmed based on the outcome of the traffic impact assessment.

7.2 SERVICE PROVISION

7.2.1 HEALTH AND SAFETY

The IFC guidelines for Health and Safety are based on the Occupational Health and Safety Act (OHSA) of America and are subsequently aligned with South African legislation (OHS Act no 85 of 1993). It is understood that the project infrastructure and equipment will be designed to good industry standards to minimise risks for personnel working at the proposed development site.

Emvelo Wind Energy Facility (Pty) Ltd will institute a Health and Safety (H&S) Plan prior to construction, for all persons working at the proposed development site. The plan will need to evaluate the risks and impacts to the health and safety of the affected community during the design, construction and operation of the proposed development, and establish preventive measures to address them in a manner commensurate with the identified risks and impacts within this assessment. Such measures need to adhere to the precautionary principle for the prevention or avoidance of risks and impacts over minimization and reduction.

7.2.2 WATER REQUIREMENTS

Water will be sourced from either the Local Municipality, supplied from a contractor and trucked in, from existing boreholes located within the application site or from a new borehole if none of these options are available. Note, however, that should municipal water supply not be confirmed, the Applicant will investigate other water sources considering any necessary and relevant legal requirements.

High water use is only anticipated during the first six months of the construction phase mainly for purposes of the turbine foundations, roads and dust suppression. Thereafter the water usage will decrease drastically. The anticipated water usage for the proposed development for the duration of the construction phase includes the following:

- Drinking;
- Ablution facilities;
- Access Road construction;
- Dust suppression;

- Fire-fighting reserve;
- Cleaning of facilities; and
- Construction of foundations for the WEF infrastructure, i.e., turbines and substation, etc.

The water use requirement during the operational phase will be primarily for human consumption and sanitation purposes.

7.2.3 STORMWATER MANAGEMENT

Stormwater drainage systems will be constructed and kept separate from the sewerage effluent system on site to ensure that stormwater run-off from site is appropriately managed. Water from these systems is not likely to contain any chemicals or hazardous substances and will be released into the surrounding environment based on the natural drainage contours.

Wastewater and sludge will be managed by local authorities and service providers. All wastewater will be handled in accordance with the *Guidelines for the Utilisation and Disposal of Wastewater Sludge Volumes 1 to 6 (Herselmann & Snyman, 2006)*.

7.2.4 WASTE

During the construction phase, it is estimated that the WEF would generate solid waste, which includes (but is not limited to) packaging material, building rubble, discarded bricks, wood, concrete, plant debris and domestic waste. Solid waste will be collected and temporarily stockpiled within designated areas on site during construction, and thereafter removed and disposed of at a nearby registered waste disposal facility on a regular basis as per agreement with the local municipality. Where possible, recycling and re-use of materials will be encouraged.

During the operational phase, the WEF will typically produce minor quantities of general non-hazardous waste mainly resulting from the O&M and office areas. General waste will be collected and temporarily stockpiled in skips in a designated area on site and thereafter removed and disposed of at a nearby registered waste disposal facility (or registered landfill) on a regular basis as per agreement with the local municipality. Where possible, recycling and re-use of materials will be encouraged.

Any hazardous waste such as chemicals or contaminated soil as a result of spillages, which may be generated during the construction and operational phases, will be temporarily stockpiled within a designated area on site and thereafter removed off site by a suitable service provider for safe disposal at a registered hazardous waste disposal facility.

The Project will adopt the 4R principle for solid waste management, which includes (in order or priority) to:

- Refuse single use plastics as much as possible;
- Reduce the use of non-recyclable products;
- Reuse solid wastes where possible to convert it into other useful products; and
- Recycle all wastes where possible.

7.2.5 SEWAGE

The Wind Energy Facility will require sewage services during the construction and operational phases. Low volumes of sewage or liquid effluent are estimated during both phases. Liquid effluent will be limited to the ablution facilities during the construction and operational phases. Portable sanitation facilities (i.e., Chemical toilets) will be used during the construction phase, which will be regularly serviced and emptied by a registered contractor on a regular basis.

The Applicant may consider a conservancy tank system which will be employed on site during the operational phase for which a registered company will be contracted to store and transport sewage from site to an appropriate municipal wastewater treatment facility.

7.2.6 ELECTRICITY

Electricity on site will be from on-site diesel generators as well as sourced from the national grid distribution networks.

7.3 EMPLOYMENT

In addition to the workforce required during the construction phase, the Project is anticipated to require additional staff during the operational phase of the Project.

7.4 SUMMARY OF PROJECT INFORMATION

Project Component	Detail
DFFE Reference	To be confirmed
Site Access	Locality to be confirmed. Total width up to 15 m (12 m after rehabilitation) consisting of up to 3 m width for underground 33 kV reticulation.
WEF Maximum Capacity	Generation Up to 200 MW
Number of Turbines	Up to 45
Wind Turbine Model	Goldwind GW6-165 6000
Hub Height from ground level	Up to 120 m
Blade Length	Up to 110 m
Rotor Diameter	Up to 220 m
Length of internal roads	Unknown at this point.
Width of internal roads	Up to 12 m to be rehabilitated to up to 9 m.
On-site substation capacity	Up to 132 kV
Proximity to grid connection	Approximately 30 km

Project Component		Detail
Grid Connection Capacity		Up to 132 kV
Area occupied by both permanent and construction laydown areas	Temporary turbine construction laydown and storage areas.	Crane platforms and hardstand laydown area up to 36Ha
	Construction laydown/staging area which will also accommodate the O&M buildings	Will be located within the permanent footprint area.
	Permanent footprint area dimensions, including roads, turbine hardstand areas, O&M buildings and battery pad.	O&M: Up to 0.5 ha Hardstand areas: Up to 0.75 ha Total area of final footprint (including roads): up to 150 ha
Operations and maintenance buildings (O&M building) with parking area		Up to 0.5 ha
Height of fencing		2.8 m
Type of fencing		Where site offices are required, temporary screen fencing used to screen offices from the wider landscape.

8. NEED AND DESIRABILITY

The EIA Regulations, 2014, as amended state that the objective of the scoping process includes to, through a consultative process, motivate the need and desirability of the proposed activity, including the need and desirability of the activity in the context of the preferred location.

8.1 THE NEED & DESIRABILITY OF RENEWABLE ENERGY FACILITIES

WEFs can play a role in mitigating or reducing climate change, addressing South Africa's energy resource constraints and producing low-cost energy. In addition, operating WEFs in South Africa contribute significantly to the economic development of the areas in which they are located through the requirements of the REIPPPP adjudication process. This section of the report highlights the national, provincial and local plans and policies that are in support of renewable energy facilities. Throughout this section, it is demonstrated that at all levels of governance, policy supports the development of renewable energy to address energy supply issues, and to promote economic growth in South Africa.

8.1.1 MITIGATING CLIMATE CHANGE

The scientific consensus is that the climate is changing and that these changes are in large part caused by human activities¹³. Of these human activities, increase in carbon dioxide (CO₂) levels due to emissions from fossil fuel combustion is regarded as a significant contributor to anthropogenic climate change.

As explained in National Treasury's Carbon Tax Policy Paper (May 2013)¹⁴, addressing the challenges of climate change through facilitating a viable and fair transition to a low-carbon economy is essential to ensure an environmentally sustainable economic development and growth path for South Africa. Further the Policy Paper states that the South African government is of the view that South Africa needs to reduce its greenhouse gas emissions while working to ensure economic growth, increase employment, and reduce poverty and inequality¹⁵.

Renewable energy projects will play a significant role in meeting the targets of the Paris Agreement and assisting the transition to a low-carbon economy.

8.1.2 DIVERSIFICATION AND DECENTRALISATION OF SUPPLY

With its abundant coal supplies, approximately 89% of South Africa's energy needs are currently met through coal-fired generators, with nuclear energy contributing approximately 5% and the balance by pumped storage and hydroelectric (3.6%), renewable energy (2.4%) and gas turbines (0.1%). Electricity generation is dominated by state-owned power company Eskom, which currently produces over 96.7% of the power used in the country.

¹³ <http://adsabs.harvard.edu/abs/2013ERL.....8b4024C>.

¹⁴ National Treasury Carbon Tax Policy Paper. Available online

<http://www.treasury.gov.za/public%20comments/Carbon%20Tax%20Policy%20Paper%202013.pdf>

¹⁵

<http://www.treasury.gov.za/public%20comments/Carbon%20Tax%20Policy%20Paper%202013.pdf>

A diversification of energy supplies and producers, particularly with respect to renewable energy sources, would lead to greater energy security and economic and environmental benefits.

The deployment of various renewable technologies increases the diversity of electricity sources and, through local decentralised generation, contributes to the flexibility of the system and its resistance to central shocks.

According to the International Energy Agency, "renewable energy resources ... exist virtually everywhere, in contrast to other energy sources, which are concentrated in a limited number of countries. Reduced energy intensity, as well as geographical and technological diversification of energy sources, would result in far-reaching energy security and economic benefits."¹⁶

The renewables programme has resulted in over 6,000 MW of generation capacity being allocated to bidders across a variety of technologies, principally in wind and solar in South Africa. Progress in this regard has been made under the DoE REIPPPP. According to the DoE's Integrated Resource Plan for Electricity 2010-2030, South Africa is aiming to procure 9,200 MW of wind power by 2030.

8.1.3 ECONOMIC DEVELOPMENT AND JOB CREATION

The REIPPPP requires Economic Development ("ED") commitments from onshore wind energy projects and projects are adjudicated according to their ED commitments. The main ED beneficiaries of approved projects are currently communities living within a 50 km radius of renewable energy facilities. Projects are bid and thereafter adjudicated according to tariff (70 %) and Economic Development (30 %). There is therefore an incentive for projects to focus on Economic Development of the Local Community and to assign as much revenue, jobs, procurement etc. to local people as well as South African companies and people as possible to stand a chance of having a successful project.

TABLE 8-1: REIPPPP WEIGHTING

Economic Development Elements	Weighting
Job Creation	25%
Local Content	25%
Ownership	15%
Management Control	5%
Preferential Procurement	10%
Enterprise Development	5%
Socio-Economic Development	15%
Total	100%
Total points	30 points

¹⁶ www.iea.org/textbase/npsum/ETP2012SUM.pdf

A number of these elements will have a significant and positive impact on the Local Community.

In terms of job creation, bidders are required to indicate the actual number of jobs that will be created for South African citizens, Skilled People, Black People, Skilled Black People and Citizens from the Local Communities. Significant skilled and unskilled job opportunities will be created in the Local Communities, particularly during the construction period.

For Ownership, bidders are required to indicate the total shareholding of the Project Company in the hands of Black People and Local Communities. The minimum ownership percentage for Local Community is 2.5% but projects have committed up to 40% Local Community Ownership to have a competitive project. Broad-based community trusts are established as a vehicle for Local Community Ownership to receive dividend revenue from an operating project that will be invested in socio-economic development imperatives as determined by trustees. The ownership stake is funded either through debt or through equity partners ("a free-carry").

The Socio-Economic Development and Enterprise Development commitments require a percentage of gross revenue from the operating wind farm to be invested in education, health, small business development etc. Projects are required to commit at least 1% of gross revenue towards socio-economic development. As an indication, 1 % of gross revenue of a hypothetical 140 MW wind farm, with a capacity factor of 35% and a tariff of 80 c/kWh would equal approximately R3.5 m/year (and R68 million over the 20-year operation period of a project). Projects in the REIPPPP receive additional points if the socio-economic and enterprise development investments are committed to be invested in the Local Community.

WEFs in South Africa will create skilled and unskilled jobs, particularly during the construction period. Under the REIPPPP, projects are incentivised to maximise the direct job creation opportunities, particularly for people in the communities surrounding the project.

WEFs tend to be constructed in rural areas with small communities and limited infrastructure and social amenities. A wind farm would create indirect jobs in accommodation, catering and other services that would support a wind farm and cater for the material and social needs of wind farm workers.

Localisation is considered one of the major contributors to job creation and general improvement of the economy of South Africa. Localisation through the construction of new manufacturing facilities to build wind turbine towers and other turbine components in South Africa is currently progressing.

Wind energy can provide technical skills to South Africans and thus improve the technical skills profile of the country and the regions where wind energy facilities are located. Through the REIPPPP, developers' own initiatives and through support from international donor agencies, a number of young South Africans are being trained on various aspects of wind farm construction and operation.

These projects, if successfully implemented, have the potential to transform for the better key development areas of South Africa and would assist South Africa in meeting its

development goals, while meeting its carbon emission reduction targets as per international protocols.

8.2 JUST ENERGY TRANSITION (JET)

The Eskom Just Energy Transition Project (EJETP) is a \$497 million project approved by the World Bank Group in November 2022 at the request of the Government of South Africa. It will support its public energy utility, Eskom, to decommission the 56-year-old Komati coal-fired power plant, repurpose the project area with renewable energy and batteries, and create opportunities for workers and communities. If successful, the project could provide a blueprint for a just energy transition in South Africa and beyond.

South Africa's highly coal-dependent power generation is aging, unreliable, polluting, and unable to keep up with demand. The current power supply gap is estimated at 4-to-6 GW causing load shedding of up to 10 hours daily, affecting people's day-to-day life and the country's economic prospects. Although electricity access is high compared to regional averages, about 10% of South Africans still lack access to electricity and 47% are considered "energy poor". Investing in reform that provides reliable electricity services and universal electricity access is urgently needed.

Renewable solutions require less than 2-year build time (coal requires 10-12 years) after financial closure. Additionally, renewables will help ensure South Africa can continue to have competitive exports in the face of growing carbon tariffs (e.g., European Union's Carbon Border Adjustment Mechanism - CBAM) and provides a significant reduction in emissions (NO_x, SO_x, PPM, CO₂) and water usage.

The EJETP will finance the decommissioning of a 1 GW coal plant that is over 56 years old. Only one of its units (Unit 9 with installed capacity of 125 MW) was operational at the time of the shutdown on October 31, 2022. The other eight units were taken out of operation, with some of them formally put in cold reserve mode but without adequate maintenance schedules, between February 2017 and May 2022. The Komati power station had been operating at only 125 MW capacity since 2021. This will be replaced with a combination of 220 MW of renewable energy solutions (including 150 MW solar PV solar and 70 MW wind) and 150 MW batteries, improving power supply and grid stability.

Beyond improving supply and grid stability, the technical solutions tested at Komati can demonstrate how South Africa can integrate renewables and batteries in the national energy grid, leading to employment creation opportunities through the installation of those new technologies.

The project is also in line with South Africa's Integrated Resource Plan (IRP), a 2019 analysis of its energy needs and costs. The plan concludes wind and solar are least cost technologies and calls for reducing the share of fossil fuel as the primary energy mix and scaling up renewable energy.

Employees at Komati Plant will be upskilled for deployment to the renewable plants as the renewable energy component will create new jobs.

The coal mining industry and coal power stations are integral to both the economic and social fabric of Mpumalanga's local economy. As the province shifts towards a low-carbon

future, it will be crucial to match or surpass the economic benefits currently provided by fossil fuels. Therefore, the success of the Just Energy Transition hinges not only on moving from fossil fuels to renewable energy sources but also on securing a fair transition in terms of jobs and skill development.

8.3 POLICIES IN SUPPORT OF RENEWABLE ENERGY

Renewable energy is supported in terms of meeting the country's climate change goals, and in terms of reducing the country's dependence on fossil fuels as the main source of meeting the country's electricity requirements. The National Climate Change Adaptation Strategy¹⁷ (NCCAS) for The Republic of South Africa Version UE10, 13 November 2019, explains that the South African primary sectors, such as agriculture and mining, which are natural resource dependent are high consumption uses of energy. The NCCAS is adopting a cluster approach to assist with the changing climate conditions and the affect it has on various sectors. An action in support of this development is the approach to "create a more adaptive energy system to reduce dependence on a centralised system and increase distributed generation, especially in rural areas". "This will involve encouraging the development of an adaptive and decentralised energy system so that the system is more resilient to climate disruptions".

Both national and provincial policies and planning documents support the development of renewable energy facilities. The development of and investment in renewable energy is supported by the National Development Plan (NDP), New Growth Path Framework, Integrated Resource Plan (IRP) and National Infrastructure Plan. At a provincial level, the development of renewable energy is supported by the Mpumalanga Provincial Spatial Development Framework (PSDF) of 2019, Gert Sibande District Municipality Integrated Development Plan (IDP) for 2020/2021, and Spatial Development Framework; and the Ubuntu Local Municipality Integrated Development Plan for 2022 - 2023.

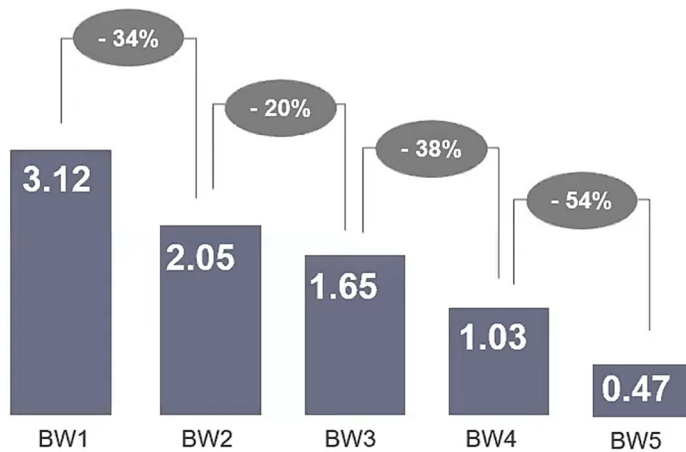
The need and desirability for renewable energy developments play a role in South Africa meeting its energy and climate change targets and provides a socio-economic boost at the local level in areas that are in need of it.

Aside from environmental considerations, investment in renewables have been driven by dramatic reductions in their costs. Plate 8-1 shows this trend and that in the six years between bid windows 4 and 5, the average price of electricity purchased through the REIPPPP fell by 54% (Magoro, 2021).

17

https://www.environment.gov.za/sites/default/files/docs/nationalclimatechange_adaptationstrategy_ue10november2019.pdf

PLATE 8-1: REIPPP AVERAGE BID PRICES IN APRIL 2021 TERMS (MAGARO, 2021)



8.4 NEED & DESIRABILITY GUIDELINE

Reference is made to the DFFE 2017 Guideline on Need and Desirability¹⁸ which states that while the “concept of need and desirability relates to the type of development being proposed, essentially, the concept of need and desirability can be explained in terms of the general meaning of its two components in which need refers to time and desirability to place – i.e. is this the right time and is it the right place for locating the type of land-use/activity being proposed? Need and desirability can be equated to wise use of land – i.e. the question of what is the most sustainable use of land.”

The guidelines pose questions that should be considered in this investigation, which will be addressed in EIA Phase.

¹⁸DEA (2017) Guideline on Need and Desirability. Department of Environmental Affairs (DEA), Pretoria, South Africa, ISBN: 978-0-9802694-4-4.

9. PUBLIC PARTICIPATION PROCESS

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

A PPP is an important part of any application. The aim of PPP is:

- To inform I&APs of the proposed project;
- 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 project and associate activities;
- 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 project; and
- To ensure that all I&AP issues and comments are accurately recorded, addressed and documented in a Comments & Response Report (CRR).

9.1 PRE-SCOPING PHASE PUBLIC PARTICIPATION PROCESS

- 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.

9.2 SCOPING PHASE PPP

I&APs were, and continue to be, able to register throughout the duration of the process and all registered I&APs are kept informed about the progress of the application.

The Scoping Phase PP included distribution of the DSR to the public, local communities, and stakeholders, who were invited to comment on the DSR. The initial DSR was made available for public review and comment from the **22 August until the 21 September 2024 (both days inclusive)** at the following locations:

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.

The PPP for the Scoping process takes cognisance of the DFFE (2017) Public Participation Guidelines in terms of NEMA EIA Regulations, as amended.

Throughout the process, stakeholders were encouraged to communicate with the PPP team to raise issues, ask questions or make suggestions. Communication with stakeholders was through telephonic means and in written form. All issues are included in the Comments and Responses Trail, and responses to address comments have been provided.

Registration of I&APs continued throughout the Scoping PPP.

9.3 SUMMARY OF COMMENTS AND RESPONSES

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

During the public consultation phase of the DSR, comments were received from the DFFE, other authorities and I&APs. Towards the end of the public comment period, follow up e-mails were sent to all registered I&APs, stakeholders and authorities.

Responses to comments received during both DSR PP periods are provided in Section 7, Table 7.1 of the PP Report (Volume III), with EAP / specialist / applicant responses, and the original comments received and associated responses have been appended to the PP report (Appendix E).

9.4 EIA PHASE PPP

The following PPP activities will be undertaken as part of the EIA Phase engagement:

- Notifications will be sent to registered I&APs, key stakeholders, and organs of state to inform them of the availability of the Draft EIA Report for their review and comment for a period of 30 days;
- The CRR will be updated, recording comments and/or queries received and recording the responses provided; and
- Notification regarding the submission of the Final EIA for DFFE approval, which will include the CRR, will be sent to registered I&APs, key stakeholders, and organs of state.

9.5 EA DECISION PHASE

Notifications will be sent to all registered I&APs, key stakeholders, and organs of state to inform them of the decision by the DFFE and the appeal procedure.

10. SCOPING PHASE ASSESSMENTS OF POTENTIAL IMPACTS

This section provides the preliminary scoping phase potential impact assessment of the proposed development.

10.1 SOIL AND AGRICULTURAL POTENTIAL

An agricultural impact is a change to the future agricultural production potential of land. In most developments, this is primarily caused by the exclusion of agriculture from the footprint of the development. Soil erosion and degradation may also contribute to loss of agricultural production potential. The significance of the impact is a direct function of the following three factors:

- The size of the footprint of land from which agriculture will be excluded (or the footprint that will have its potential decreased);
- The baseline production potential (particularly cropping potential) of that land; and
- The length of time for which agriculture will be excluded (or for which potential will be decreased).

In the case of wind farms, the first factor, size of footprint, is so small that the total extent of the loss of future agricultural production potential is insignificantly small, regardless of how much production potential the land has, and regardless of the duration of the impact. This is because the required spacing between turbines means that the amount of land excluded from agricultural use is extremely small in relation to the surface area over which a wind farm is distributed.

Wind farm infrastructure (including all associated infrastructure and roads) typically occupies less than 2% of the surface area, according to the typical surface area requirements of wind farms in South Africa (DEA, 2015). Most WEFs, occupy less than 1% of the surface area. All agricultural activities can continue unaffectedly on all parts of the farmland other than this small footprint, from which agriculture is excluded, and the actual loss of production potential is therefore insignificant.

A study done to measure the impact of existing WEFs on agricultural production potential (Lanz, 2018) is highly informative of the extent of the agricultural impact that is likely for this proposed development. Although the study was done in a different agricultural environment, it is similar in terms of being a highly productive and intensively farmed environment with cultivation. There is no reason that the results obtained in that study would not be applicable to the area in this assessment. The overall conclusion of the study was that, although wind farms have been established within an area of cultivated farmland that supports intensive and productive farming, it is highly unlikely that this has caused a reduction in agricultural production. Small amounts of production land have been lost, but the consequence of this for agricultural production has been negligible. It is likely that the positive financial impacts of wind farming have outweighed the negative impacts, and that wind farming has benefited agriculture and agricultural production in the area.

As identified in the study, it is important to note that wind farms have both positive and negative effects on the production potential of land. It is the net sum of these positive and negative effects that determines the extent of the change in future production potential. The positive effects are:

- **Increased financial security for farming operations** - reliable and predictable income will be generated by the farming enterprises through the lease of land to the energy facility. This will increase financial security and could improve farming operations and productivity through increased investment into farming.
- **Improved security against stock theft and other crime** due to the presence of security infrastructure and security personnel at the energy facility.
- **An improved road network**, with associated stormwater handling system. The WEF will construct turbine access roads of a higher standard than the existing farm roads, which will give farming vehicles better access to farmlands. This will be especially relevant during wet periods when access to croplands for spraying etc. is limited by the current farm roads.

There are two additional effects, but because they are highly unlikely to influence agricultural production, they are not considered further. They are:

- **Prevention of crop spraying by aircraft over land occupied by turbines** – ground based or using drones for spraying are effective, alternative methods that can be used without implications for production or profitability.
- **Interference with farming operations** - construction (and decommissioning) activities are likely to have some nuisance impact for farming operations but are highly unlikely to have an impact on agricultural production.

Due to the fact that the proposed development will exclude agricultural production from only a very small area of land, and that its negative impact is offset by economic and other benefits to farming, the overall negative agricultural impact of the development (loss of future agricultural production potential) is assessed here as being of low significance and as acceptable.

The agricultural protocol requires an indication of the potential losses in production and employment from the change of the agricultural use of the land as a result of the proposed development. As this assessment has shown, the agricultural use of the land will be integrated with the renewable energy facility, and it will continue with no discernible change in terms of production. The expected losses in production and employment will therefore be zero.

10.2 NOISE

Increased noise levels are directly linked with the various activities associated with the construction of the proposed development, as well as the operation phase of the WEF. In South Africa the document that addresses the issues concerning environmental noise is SANS 10103. It provides the maximum average ambient noise levels, $L_{Req,d}$ and $L_{Req,n}$, during the day and night respectively to which different types of developments may be exposed. For rural areas the Zone Sound Levels (Rating Levels) are:

- Day (06:00 to 22:00) - $L_{Req,d} = 45$ dBA, and
- Night (22:00 to 06:00) - $L_{Req,n} = 35$ dBA.

10.2.1 CONSTRUCTION PHASE

There are a number of factors that determine the audibility as well as the potential of a noise impact on receptors. Maximum noises generated can be audible over a large distance, however, maximum noises are generally of very short duration. If maximum noise levels however exceed 65 dBA at a receptor, or if it is clearly audible with a significant number of instances where the noise level exceeds the prevailing ambient sound level with more than 15 dB, the noise can increase annoyance levels and may ultimately result in noise complaints. Average or equivalent sound levels are another factor that impacts on the ambient sound levels and is the constant sound level that the receptor can experience.

Increased noises or disturbing noises during the construction phase may increase annoyance levels with project. Noise levels could exceed 45 dBA during construction. (temporary construction of access roads, construction of WTG as well as construction traffic passing close to NSR). Multiple construction activities taking place simultaneously may impact an area up to 2,000 m from the activities at night.

As a preliminary guideline, construction activities within 160 m from an identified and verified NSR is not recommended considering daytime noise limits (considering only construction noises). This buffer would be more considering night-time noise rating levels.

Without noise propagation modeling where cumulative effects are included, it is difficult to assess the potential significance of the noise impact. Using the precautionous approach, it is Possible to Highly Probable that a noise impact will occur (depending on location of NSR), with the consequence likely Negligible to Moderately Severe (depending on location of NSR in relation to noise generating activities).

10.2.2 OPERATIONAL PHASE

The proposed development would be designed to have an operational life of up to 25 years with the possibility to further expand the lifetime of the WEF. The only development related activities on-site will be routine servicing (access roads and light traffic) and unscheduled maintenance.

However, projected operational noise impacts will only be modelled during the future EIA phase. However, considering the presence of NSRs as well as noise levels associated with operating WTG, noises could change existing ambient sound levels, will be audible and could annoy NSR.

Increases in noise levels at closest receptors, though WTG will only operate during periods with increased wind speeds. Considering international guidelines, a noise limit of 45 dBA is recommended. The extent of the impact relates to multiple WTG operating at night could impact on an area up to 2,500 m from the WTG.

Depending on the layout and the sound power emission levels (SPL) of WTG available on the market, noise levels may be higher than 45 dBA for a worst-case scenario (using the SPL of 112.6 dBA). Without noise propagation modelling where cumulative effects are

included, it is difficult to assess the potential significance of the noise impact. Using a precautionary approach, it is Probable to Highly Probable that a noise impact will occur. The potential significance of the noise impact will be assessed in more detail in EIA phase using a more detailed noise model.

10.3 FRESHWATER AND WETLANDS (AQUATICS)

The primary aquatic impacts anticipated from the proposed development during the project phases are summarized below:

- Loss of habitat containing protected species or Species of Special Concern - activities resulting in physical disturbance of aquatic systems which provide ecosystem services, especially where new crossings are made, or large hard engineered surfaces are placed within the buffer zones. Loss can also include a functional loss, through change in vegetation type via alien encroachment, reducing aquatic biodiversity. However no aquatic vegetation or fauna with conservation concern were observed during this assessment, coupled to the fact that any sensitive areas will be avoided.
- Loss of any critical corridors, important catchment areas and connected habitats that are linked to any Critical Biodiversity Areas or Ecological Support Areas - activities resulting in physical disturbance of aquatic systems which provide ecosystem services, especially where new crossings are made, or large hard engineered surfaces are placed within the buffer zones and have been included in any Critical Biodiversity Areas. It is assumed that the final layout will orientate the hardstands, crane pads, blade laydowns and construction camps outside of any of the No-Go areas. The current preferred laydown area is located within a sensitive aquatic areas and will need to be adjusted.
- The potential spread of alien vegetation - during construction, complete clearing of the roads and turbine areas, as well any ancillary structures (offices and substations) will be required. This disturbance then allows for the alien species to colonise the soils, if left unmanaged.
- Loss of riparian and or wetland habitat - It was recommended that all wetlands / riverine systems as well as the inclusive of buffers, be avoided. It is assumed that the final layout will orientate the hardstands, crane pads, blade laydowns and construction camps outside of any of the No-Go areas. This also includes the current substation site and O/M Buildings that are located within a sensitive aquatic area.
- Changes to the hydrological regime and increased potential for erosion - it was recommended that all wetlands / riverine systems as well as the inclusive of buffers, be avoided. It is assumed that the final layout will orientate the hardstands, crane pads, blade laydowns and construction camps outside of any of the No-Go areas. This also includes the current substation site and O/M Buildings that are located within a sensitive aquatic area.
- Changes to water quality - during construction or decommissioning, earthworks will expose and mobilise earth materials, and a number of materials as well as chemicals will be imported and used on site and may end up in the surface water, including soaps, oils, grease and fuels, human wastes, cementitious wastes, paints and solvents, etc. Any spills during transport or while works area conducted in proximity to a watercourse

has the potential to affect the surrounding biota. This can result in possible deterioration in aquatic ecosystem integrity and species diversity.

- The cumulative impact assessment considers the combined impact of the remaining and other renewable projects within a 30 km radius, that are also in the development phase and the associated grid lines on the aquatic resources. The rating below is based on the premise that important or sensitive features will be avoided by the various projects, while the mitigations proposed will ensure that the form and or function of downstream areas remain intact

10.4 TERRESTRIAL BIODIVERSITY (FLORA AND FAUNA)

The main terrestrial biodiversity impacts likely to result from the proposed development are summarised below:

- Vegetation - permanent or temporary loss of indigenous vegetation cover because of site clearing. Site clearing before construction will result in the blanket clearing of vegetation within the affected footprint.
- Flora Species - loss of flora species of special concern during pre-construction site clearing activities.
- Alien Invasive Species - susceptibility of post construction disturbed areas to invasion by exotic and alien invasive species and removal of exotic and alien invasive species during construction. Post construction disturbed areas having no vegetation cover are often susceptible to invasion by weedy and alien species, which can not only become invasive but also prevent natural flora from becoming established.
- Erosion - susceptibility of some areas to erosion because of construction related disturbances. Removal of vegetation cover and soil disturbance may result in some areas being susceptible to soil erosion after completion of the activity.
- Ecological Processes - disturbances to ecological processes: Activity may result in disturbances to ecological processes.
- Aquatic and Riparian processes - aquatic and Riparian processes: Aquatic habitat is present and could be affected.
- Faunal Habitat - loss of Faunal Habitat: Activity will result in the loss of habitat for faunal species.
- Faunal Processes - impacts to faunal processes because of the activity.
- Faunal Species - loss of faunal SSC due to construction activities: Activities associated with bush clearing, killing of perceived dangerous fauna, may lead to increased mortalities among faunal species.

10.5 AVIFAUNA

The following potential impacts on avifauna have been identified (Note: Impacts will be rated for significance during the EIA phase once final sensitivities are determined and the layout is updated):

10.5.1 CONSTRUCTION PHASE

- Displacement of priority species due to disturbance associated with the construction of the wind turbines and associated infrastructure.
- Displacement of priority species due to habitat transformation associated with the construction of the wind turbines and associated infrastructure.
- Displacement of power line sensitive species due to disturbance
- Displacement of power line sensitive species due to habitat transformation.

10.5.2 OPERATIONAL PHASE

- Mortality due to collisions with the wind turbines.
- Mortality due to electrocutions on the overhead sections of the internal 33kV cables.
- Mortality due to collisions with the overhead sections of the internal 33kV cables.
- Displacement of power line sensitive species due to disturbance
- Displacement of power line sensitive species due to habitat transformation.

10.5.3 DECOMMISSIONING PHASE

- Displacement due to disturbance associated with the decommissioning (dismantling) of the wind turbines and associated infrastructure.
- Displacement of power line sensitive species due to disturbance
- Displacement of power line sensitive species due to habitat transformation.

10.5.4 CUMULATIVE PHASE

10.5.4.1 WIND ENERGY FACILITY

The proposed Emvelo WEF will consist of up to 45 turbines, contributing to a total of 202 potential wind turbines within a 35km radius, including those planned for Rochdale WEF, Sheepmoor WEF, Camden I WEF, and Camden II WEF. None of these projects have been constructed yet, as they are pending a competitive bidding process for power purchase agreements. Emvelo WEF's 45 turbines represent 22% of the total planned turbines, leading to a moderate to high cumulative impact.

The total land area designated for renewable energy developments, including Emvelo WEF, is approximately 268.3 km² (7% of similar habitat available to birds within the 35km radius). The Emvelo WEF itself covers 70.3 km², which is 26% of the designated renewable energy land but less than 2% of the total area within the 35km radius. Thus, its contribution to habitat transformation and potential displacement of priority species is considered medium to low.

10.5.4.2 GRID CONNECTION INFRASTRUCTURE

Within a 35km radius around the proposed Grid Connection Project, there are several existing high-voltage (HV) lines totaling approximately 300km (Figure 26). The combined length of all existing and planned HV lines in this area is estimated at 383km. The proposed Emvelo WEF Grid Connection will add 30km, representing about 8% of the total HV lines.

The Emvelo WEF Grid Connection's contribution to the cumulative impact of all HV lines is low. However, the overall impact of all grid connections and HV lines in the area, primarily due to collision mortality of priority species with powerlines, is assessed as high. This cumulative collision impact is considered high before mitigation measures and medium after mitigation.

10.6 BATS

Impacts to bats are likely to occur because of the construction, operation and decommissioning of the WEF and grid connection. Potential impacts include habitat modification and disturbance, fatality due to collisions with wind turbine blades, and light pollution since these are the major impacts likely to be associated with the project (Kunz et al. 2007b, Cryan and Barclay 2009).

10.6.1 CONSTRUCTION PHASE

Removal of vegetation, noise and dust generated during construction activities, and the presence of new infrastructure in the landscape, will negatively and indirectly impact bats by removing habitat used for foraging and commuting, through disturbance, and displacement (Kunz et al. 2007b, Millon et al. 2015, Millon et al. 2018, Bennun et al. 2021, Leroux et al. 2022).

Construction of WEF infrastructure could result in destruction (direct impact) of bat roosts (rocky crevices, buildings) and disturbance (indirect impact) of bat roosts potentially resulting in roost abandonment. Bat mortality can occur if roosts containing bats are destroyed. Installation of new infrastructure in the landscape (e.g., buildings, turbines, road culverts) can provide new roosting spaces for some bat species, attracting them to areas with wind turbines and potentially increasing the likelihood of collisions.

10.6.2 OPERATIONAL PHASE

Bat mortality (direct impact) through collisions with wind turbine blades is the principal impact of WEFs on bats (Cryan and Barclay 2009, Arnett et al. 2016).

Construction of project infrastructure will increase ecological light pollution from artificial lighting associated with the substation and other operational and maintenance buildings. Light pollution can alter ecological dynamics (Horváth et al. 2009). Lighting attracts and can cause direct mortality of insects, reducing the prey base for bats, especially bat species that are light-phobic. These species may also be displaced from previous foraging areas due to lighting. Other bat species forage around lights, attracted by higher numbers of insects. This may bring these species into the vicinity of the project and indirectly increase the risk of collision with wind turbines.

The direct impact of grid connection infrastructure is collisions with powerlines. Insectivorous bats are unlikely to collide with powerlines since they can avoid these obstacles using echolocation, but fruit bats do collide with powerlines (Tella et al. 2020), although the likelihood of occurrence for fruit bats species in the AoI is low. Indirect impacts include loss of habitat to construct substations and OHL pylons, and ecological light pollution (Longcore and Rich 2004).

Construction of grid infrastructure will increase ecological light pollution from artificial lighting associated with the substation and other operational and maintenance buildings. Light pollution can alter ecological dynamics (Horváth et al. 2009). Lighting attracts and can cause direct mortality of insects, reducing the prey base for bats, especially bat species that are light-phobic. These species may also be displaced from previous foraging areas due to lighting. Other bat species forage around lights, attracted by higher numbers of insects. This may bring these species into the vicinity of the project and indirectly increase the risk of collision with wind turbines.

10.6.3 DECOMMISSIONING PHASE

Impacts for the WEF and grid connection during the decommissioning phase will be indirect and involve disturbance to bats through excessive noise and dust, and damage to vegetation.

10.7 SOCIO-ECONOMIC

10.7.1 CONSTRUCTION PHASE

The key potential social impacts during the construction phase include:

Potential positive impacts

- Creation of employment and business opportunities, and opportunity for skills development and on-site training.

Potential negative impacts

- Impacts associated with the presence of construction workers on local communities;
- Impacts related to the potential influx of jobseekers;
- Increased risks to livestock and farming infrastructure associated with the construction related activities and presence of construction workers on the site;
- Increased risk of grass fires associated with construction related activities;
- Nuisance impacts, such as noise, dust, and safety, associated with construction related activities and vehicles; and
- Impact on productive farmland.

The construction phase will extend over a period of approximately 18-24 months and create in the region of 200-250 employment opportunities that will benefit members from the local communities in the area, specifically Ermelo. These opportunities will include opportunities for low, semi and highly workers. Most of the employment opportunities will accrue to Historically Disadvantaged (HD) members of the community. A percentage of the wage bill will be spent in the local economy which will also create opportunities for local businesses in the local towns in the area, specifically Ermelo. Given relatively high local unemployment levels and limited job opportunities in the area, this will represent a significant, if localised, social benefit. Based on information from similar projects the total wage bill will be in the region of R 25 million (2023 Rand values). A percentage of the wage bill will be spent in the local economy which will also create opportunities for local businesses in the local towns in the area.

Impacts associated with the Presence of Construction Workers on Local Communities

The presence of construction workers poses a potential risk to family structures and social networks. While the presence of construction workers does not in itself constitute a social impact, the manner in which construction workers conduct themselves can impact on local communities. The most significant negative impact is associated with the disruption of existing family structures and social networks. This risk is linked to potentially risky behaviour, mainly of male construction workers, including:

- An increase in alcohol and drug use;
- An increase in crime levels;
- The loss of girlfriends and/or wives to construction workers;
- An increase in teenage and unwanted pregnancies;
- An increase in prostitution; and
- An increase in sexually transmitted diseases (STDs), including HIV.

Impacts related to the Potential Influx of Jobseekers

Large construction projects tend to attract people to the area in the hope that they will secure a job, even if it is a temporary job. These job seekers can in turn become “economically stranded” in the area or decide to stay on irrespective of finding a job or not. While the proposed project on its own does not constitute a large construction project, the establishment of a number of renewable energy projects in the area may attract job seekers to the area. As in the case of construction workers employed on the project, the actual presence of job seekers in the area does not in itself constitute a social impact. However, the way in which they conduct themselves can impact on the local community. The main areas of concern associated with the influx of job seekers include:

- Impacts on existing social networks and community structures;
- Competition for housing, specifically low-cost housing;
- Competition for scarce jobs; and
- Increase in incidences of crime.

Increased Risks to Livestock and Farming Infrastructure associated with the Construction Related Activities and Presence of Construction Workers on the Site

The presence on and movement of construction workers on and off the site poses a potential safety threat to local farmers and farm workers in the vicinity of the site. In addition, farm infrastructure, such as fences and gates, may be damaged and stock losses may also result from gates being left open and/or fences being damaged, or stock theft linked either directly or indirectly to the presence of farm workers on the site. The potential risks (safety, livestock, and farm infrastructure) can be effectively mitigated by careful planning and managing the movement of construction on and off the site workers during the construction phase.

Increased Risk of Grass Fires associated with Construction Related Activities

The presence of construction workers and construction-related activities on the site poses an increased risk of grass fires that could, in turn pose, a threat to livestock, crops, wildlife and farm infrastructure. The local landowners indicated that the area is very susceptible to grass fires during the winter months (May-October) and that the veld can take up to 3 years to recover to full productivity.

Nuisance Impacts, such as Noise, Dust, and Safety, associated with Construction Related Activities and Vehicles

Construction activities on site and movement of heavy construction vehicles during the construction phase has the potential to create noise and dust impacts, damage local roads and create safety impacts for other road users. Potential dust and noise impacts associated with the construction phase are likely to be limited. The traffic related impacts associated with the transport of materials to the site can also be effectively managed if the required mitigation measures are implemented.

Impact on Productive Farmland

The activities associated with the construction phase and establishment of the proposed project and associated infrastructure will result in the disturbance and loss of land available for crops and grazing. However, experience from other WEFs is that impact on farming operations can be effectively minimised and mitigated by careful planning in the final layout of the proposed WEF and associated components. The impact on farmland associated with the construction phase can also be mitigated by minimising the footprint of the construction related activities and ensuring that disturbed areas are fully rehabilitated on completion of the construction phase.

The timing / phasing on construction activities should where possible also be planned to avoid and or minimise disruption to planting and harvesting operations. Affected landowners should be involved in planning of timing of construction activities. Consideration should also be given to planning the construction activities so as to ensure arable areas remain productive for as long as possible, i.e., are not withdrawn from production months in advance. Ideally, construction should start after harvesting and be planned to reduce disruptions to the following planting season.

10.7.2 OPERATIONAL PHASE

The following key social issues are of relevance to the operational phase:

Potential Positive Impacts

- The establishment of infrastructure to improve energy security and support renewable sector;
- Creation of employment opportunities;
- Benefits to the affected landowners; and
- Benefits associated with the socio-economic contributions to community development.

Potential Negative Impacts

- Impact on property values; and
- Impact on tourism.

The Establishment of Infrastructure to Improve Energy Security and Support Renewable Sector

The primary goal of the proposed project is to improve energy security in South Africa by generating additional energy. The proposed WEF also reduces the carbon footprint associated with energy generation. The project should therefore be viewed within the context of the South Africa's current reliance on coal powered energy to meet the majority of its energy needs, and secondly, within the context of the success of the REIPPPP.

Impact on Property Values

A literature review was undertaken as part of the SIA. It should be noted that the review does not constitute a property evaluation study and merely seeks to comment on the potential impact of WEFs on property values based on the findings of studies undertaken overseas. The assessment rating is based on the findings of the review. Based on the findings of the literature review the potential impact of WEFs on rural property values is likely to be low, specifically for farms that are farmed as productive farms. As indicated above, the potential loss of productive land and the associated potential impact on property values can also be minimised by careful planning and siting of wind turbines.

Impact on Tourism

A review of international literature in the impact of wind farms was undertaken. Based on the findings of the review there is limited evidence to suggest that the proposed WEF would impact on the tourism in the area. As indicated above, the area has also been impacted by the Camden Power Station and associated transmission lines and large-scale coal mining.

10.7.3 DECOMMISSIONING PHASE

Typically, the major social impacts associated with the decommissioning phase are linked to the loss of jobs and associated income. This has implications for the households who are directly affected, the communities within which they live, and the relevant local authorities. However, in the case of the proposed facility the decommissioning phase is likely to involve the disassembly and replacement of the existing components with more modern technology. This is likely to take place in the 20 - 25 years post commissioning. The decommissioning phase is therefore likely to create additional, construction type jobs, as opposed to the jobs losses typically associated with decommissioning. The number of people employed during the operational phase will be in the region of 20. Given the low number of people employed during the operational phase the decommissioning of the facility will not have a significant negative social impact on the local community. The potential impacts associated with the decommissioning phase can also be effectively managed with the implementation of a retrenchment and downscaling programme.

The decommissioning phase will also create employment opportunities. This will represent a positive impact. These jobs will, however, be temporary.

10.7.4 CUMULATIVE PHASE

Cumulative Impact on Sense of Place

The potential cumulative impacts on the areas sense of place will be largely linked to potential visual impacts. The establishment of the WEF and other WEFs in the area will create the potential for combined and sequential visibility impacts. The impact on sense of place will be informed by the findings of the VIA.

Cumulative Impact on Local Services and Accommodation

The objective will be to source as many low and semi-skilled workers for the construction phase from the MM, specifically Ermelo. This will reduce the pressure on local services and accommodation in Ermelo. For a single WEF project ~ 200-250 workers may require accommodation. In the event of the construction phase for 3 projects overlapping, the total number of workers requiring accommodation would be between 500 and 600. The potential pressure on local services will depend on the number of locally based contractors and workers that are employed during the construction phase.

The potential impact should also be viewed within the context of the potential positive cumulative impacts for the local economy associated with the establishment of the proposed facility and associated renewable energy projects in the MM. These benefits will create opportunities for investment in the MM, including the opportunity to up-grade and expand existing services and the construction of new houses. Socio-economic development (SED) contributions also represent an important focus of the REIPPPP and is aimed at ensuring that the build programme secures sustainable value for the country and enables local communities to benefit directly from the investments attracted into the area. The proposed WEF is also required to contribute a percentage of projected revenues accrued over the 20-year period to SED. This will provide revenue that can be used by the MM to invest in up-grading local services where required. It should also be noted that it is the function of national, provincial, and local government to address the needs created by development and provide the required services. The additional demand for services and accommodation created by the establishment of development renewable energy projects should therefore be addressed in the Integrated Development Planning process undertaken by the MM.

Cumulative Impact on Local Economy

In addition to the potential negative impacts, the establishment of renewable energy facilities and associated infrastructure, including the proposed WEF, will also create several socio-economic opportunities for the MLM. The positive cumulative opportunities include creation of employment, skills development and training opportunities, and downstream business opportunities. The potential cumulative benefits are associated with both the construction and operational phase of renewable energy projects and associated infrastructure and extend over a period of 20-25 years. However, steps must be taken to

maximise employment opportunities for members from the local communities in the area and support skills development and training programmes.

10.8 HERITAGE, ARCHAEOLOGY AND PALAEOLOGY

The field survey was undertaken in mid-May 2023. Ground visibility varied from good to poor. Sites in the grassland were visible as general features and sometimes specific features were noted. This was dependent on the type and length of grass.

The Emvelo WEF consisted of large maize fields at the base and in the valley, and steep hills. The hills have been overgrown with black wattle and many of the access roads/tracks are now covered. This made site access a problem in a few areas.

The black wattle woodlots have greatly expanded and covered many of the settlements from the desktop study. There was no evidence of these settlements where access through the woodlots was possible. The Black Wattle has literally destroyed the sites and any potential graves. The situation is exacerbated by the current program of removing the black wattle being removed by bulldozers in some areas.

Many of the desktop sites are also in fields that have been converted to agricultural activity. While several areas have kept known graves intact, within these fields, others have not. In this way, large wattle woodlots and agricultural fields were omitted from the survey. Grasslands were not omitted.

A general statement regarding settlements and graves can be made from the survey. Those settlements that were surveyed tend to have human graves associated with them. The desktop settlements that could not be surveyed for various reasons, many still have graves associated with them. They would be subsurface and in various states of preservation. These latter settlements should be treated as sensitive for potential graves, but do not need to be treated as a red flag, Table 10-1 below lists recorded sites.

TABLE 10-1: LOCATION AND DESCRIPTION OF RECORDED SITES

Name	Latitude	Longitude	Description	Significance
EMVE01	-26.659232578	30.287890668	grave	High
EMVE02	-26.656614731	30.278515784	Windhoek 2 graves	High
EMVE03	-26.678342368	30.275034825	Klipfontein farm	Unknown
EMVE04	-26.681143700	30.274493393	Cemetery	High
EMVE05	-26.640561011	30.327702841	farmhouse	Unknown
EMVE06	-26.602617800	30.330840200	modern cemetery	High

Name	Latitude	Longitude	Description	Significance
EMVE07	-26.600501450	30.330320888	Graves, walling	Medium - High
EMVE08	-26.599500959	30.330142801	House ruins	Medium
EMVE09	-26.590699717	30.355348755	kraal	Low
EMVE010	-26.623959900	30.326098113	Schiedam	Medium - High
EMVE011	-26.631370375	30.328491814	Schiedam 2	Low
EMVE012	-26.608061255	30.355924805	cemetery	High

With reference to Table 10-1, the following should be noted when considering potential impacts:

- The current layout will potentially affect one site: EMWE09;
- EMV09 consists of two stone walled kraals. If the kraals are to be affected, then they will need to be mapped and photographed prior to construction; and
- For the sites located in close to proximity to graves or cemeteries, a 50 m buffer needs to be implemented around the site. The site needs to be clearly demarcated before construction begins. The site will need to be visibly demarcated before construction phase commences if any activity occurs within 50 m of it. The demarcation should be 20 m from the grave.

10.9 VISUAL/LANDSCAPE

10.9.1 CONSTRUCTION PHASE

Construction activities for the include the removal of vegetation, earthworks required to create building terraces for internal substations and preparation of the internal roads as well as excavations for the turbine structures foundations associated infrastructure and the clearing of vegetation for access roads. Construction activities would potentially negatively affect the landscape's visual quality and sense of place relative to its baseline. They would contrast with the patterns that define the structure of the landscape.

The impact on the visual environment during the construction phase is assessed to have a potential medium severity over a local area (but extend beyond the site boundary to at least at 8,0km) and would occur over the short-term (less than five years) resulting in a medium consequence.

Construction activities for the grid connection include the removal of vegetation, earthworks required to create building terraces for internal substations and the clearing of

vegetation and preparation for access roads. Construction activities would potentially negatively affect the landscape's visual quality and sense of place relative to its baseline. They would contrast with the patterns that define the structure of the landscape.

The impact on the visual environment during the construction phase is assessed to have a potential medium severity over a local area (but extend beyond the site boundary to at least at 5.0 km) and would occur over the short-term (less than five years) resulting in a medium consequence.

10.9.2 OPERATIONAL PHASE

Operational activities for the WEF include the regular maintenance of the wind turbines, vegetation management under and around the structures and maintenance of all other infrastructural components. Security lighting, aviation hazard flashing lights, and other lighting associated with the movement of security vehicles at night. These activities along with the physical presence of the Project components day and night, constitute the visual impact.

The worst-case impact on the visual environment during the operational phase is assessed to have a high severity over a widespread area and would occur over the medium-term (anticipated to be twenty-five years) resulting in a high consequence.

Operational activities for the grid connection include the maintenance of the access roads and pylons, and vegetation management and maintenance under and around the transmission lines and other infrastructural components such as substations. These activities along with the physical presence of the Project components, constitute the visual impact.

The worst-case impact on the visual environment during the operational phase is assessed to have a medium severity over a regional area and would occur over the medium-term (anticipated to be thirty years) resulting in a medium consequence.

10.9.3 DECOMMISSIONING PHASE

Decommissioning and closure activities for both the WEF and grid connection include the dismantling and removal of infrastructure and the rehabilitation of the site back to its current, mostly natural, state.

The impact on the visual environment during this phase is assessed to have a medium intensity over a local area and would occur over the short-term (less than five years) resulting in a low consequence.

10.9.4 CUMULATIVE IMPACT PHASE

The cumulative impact of the Project is High. The Emvelo WEF will be seen together with the other two proposed WEF's (Rochdale and Sheepmoor) that are planned. These, together with the proposed new transmission power lines running south and through the study area, as well as the existing Camdon power station and powerlines, contribute to the cumulative effect of power infrastructure in the sub-region.

The combined effect of proposed WEF project and the existing power infrastructure and associated infrastructure would cause a major change the nature, sense of study and character of the sub-region's landscape's baseline.

10.10 TRAFFIC AND TRANSPORTATION

Heavy vehicles traffic during both construction and decommissioning phase of the development are expected to cause additional wear and tear on the surrounding road network. The gravel roads to the sites are also expected to sustain damage during the construction and decommissioning phase of the project (i.e., surface distress - gravel loss leading to damage to the existing gravel road layers and rutting).

Heavy vehicles are expected to cause dust along unpaved access roads to the site during the transportation of various components to the site leading to possible loss of visibility from a safety point of view, health, damage to roadside vegetation and environmental impact such as air pollution.

The project will inevitably result in the disruption of traffic on Local, Regional, and National Routes but to some varying degrees. The severity of the impacts will depend on the order of the road (how many lanes, width, length, turns, etc.), the receiving environment and vicinity of land uses and towns. Additional traffic on the road network could result in changes to the operations of that road network. The severity of the impacts will depend on the expected traffic to be generated by the proposed development. A full traffic impact assessment will be required to estimate the volume of traffic associated with the transportation of personnel and materials/components during the construction and operation phases.

The project will inevitably result in the movement of abnormal loads on Local, Regional and National Routes, but to varying degrees. The severity of the impacts will depend on the travelling speed, size and loaded height of the abnormal vehicles expected. Thus, additional abnormal traffic on the road network could result in changes to the operational performance/level of service of that road network.

11. SUMMARY OF PRELIMINARY FINDINGS AND CONCLUSION

11.1 SOIL AND AGRICULTURAL POTENTIAL

The overall conclusion of this assessment is that the proposed development offers a valuable opportunity for integrating renewable energy with agricultural production in a way that provides benefits to agriculture but leads to insignificant loss of future agricultural production potential.

The site is classified as ranging from low to very high agricultural sensitivity by the screening tool. This site sensitivity verification verifies those parts of the site that are indicated as cropland in this assessment as being of high agricultural sensitivity (or very high for irrigated cropland), and the rest of the site as being of medium agricultural sensitivity.

In general, the soils across more than half of the site have insufficient capability for viable crop production and those on the remaining proportion are suitable for viable cropping. Soil limitations that prevent crop production are predominantly the result of limited depth due to underlying bedrock, clay, or hardpan, or the result of poor drainage. The crop-suitable versus unsuitable soils have been identified over time through trial and error. All the deep, well-drained, suitable soils are generally cropped and uncropped soils that are used for grazing can reliably be considered to have various limitations that make them unsuitable for crop production.

In general, the agricultural production potential of the site is high, and it is within an area that makes a significant contribution to food production in the country. Due to the favourable climate, crop yields are high on the suitable soils with average maize yields of around 7 tons per hectare according to the farmers on site.

An agricultural impact is a change to the future agricultural production potential of land. This is primarily caused by the exclusion of agriculture from the footprint of a development. In the case of wind farms, the amount of land excluded from agriculture is so small that the total extent of the loss of future agricultural production potential is insignificantly small, regardless of how much production potential the land has, and regardless of the duration of the impact. Furthermore, wind farms have both positive and negative effects on the production potential of land, and it is the net sum of these positive and negative effects that determines the extent of the change in future production potential. The positive effects are:

- Increased financial security for farming;
- Improved security against stock theft and other crime; and
- An improved road network, with associated storm water handling system

Due to the facts that the proposed development will exclude agricultural production from only a very small area of land, and that its negative impact is offset by economic and other benefits to farming, the overall negative agricultural impact of the development (loss of future agricultural production potential) is assessed here as being of low significance and as acceptable.

Its acceptability is further substantiated by the following points:

- The proposed development will also have the wider societal benefits of generating additional income and employment in the local economy.
- In addition, the proposed development will contribute to the country's urgent need for energy generation, particularly renewable energy that has much lower environmental and agricultural impact than existing, coal powered energy generation.
- All renewable energy development in South Africa decreases the need for coal power and thereby contributes to reducing the large agricultural impact that open cast coal mining has on highly productive agricultural land throughout the coal mining areas of the country. Furthermore, a reduction in coal power saves water resources and therefore potentially makes more water available for irrigated agriculture.

11.2 NOISE

A site sensitivity verification and scoping level assessment of the predicted noise environment due to the development of the WEF was undertaken.

This assessment is based on a desktop assessment as well as a basic predictive model to identify potential issues of concern. Wind turbines do emit noises at sufficient levels to propagate over large distances and this assessment indicates a potential noise impact on the closest receptors.

Considering the preliminary wind turbine layout (which will be updated in response to specialist findings, resource and technical optimisation for the EIA Phase), there is a potential of a low to medium significance of a noise impact during the construction phase, and of a low to high significance during the operational phase on the different identified NSR. It should be noted that mitigation measures would be identified and recommended during the environmental noise impact assessment, which would reduce the significance to low.

Further study is required, and it is recommended that a full Environmental Noise Impact Assessment study be conducted for the WEF.

11.3 FRESHWATER AND WETLANDS (AQUATICS)

During this assessment, several sensitive aquatic habitats were observed and are shown in the maps provided in this report. Noteworthy areas, were then avoided by the required infrastructure, and include the main riverine and wetland systems, while the access roads could will make use of existing roads thus previously disturbed areas. The current substation site and O/M Buildings are located within a sensitive aquatic areas and the localities will need to be adjusted.

If this is carried out, then the specialist has no objection to the authorisation of the proposed activities assuming that all mitigations and buffer zones are implemented.

It is further recommended from the project onset that all watercourse areas (inclusive of buffers) are included into any existing EMPr as reference, this to ensure a net benefit to the aquatic environment. This should from part of the suggested walk down as part of the final EMP preparation.

11.4 TERRESTRIAL BIODIVERSITY AND PLANT

Further to the above assessment, analysis of the site and surrounding area, indicates that the area is generally highly fragmented from historical and present agriculture in the wider area. The area is generally highly fragmented from historical and present agriculture in the wider area. The surrounding landscape is typically comprised of a mosaic of cultivated fields, pastures, dryland pastures and other rural infrastructure interspersed with natural or intact vegetated (undeveloped) areas. A network of watercourses and vleis also bisect the landscape, generally providing the most undisturbed habitat as well as key ecological corridors. The specific site is comprised of a mix of natural vegetation, secondary vegetation (old lands) and cultivated lands as well as areas that are periodically mowed for harvesting of hay.

Although highly fragmented, functionally speaking, ecological connectivity is indirectly maintained in such areas, functioning as a broader ecologically connected unit through the mosaic of remnant intact patches as well as old lands where ecological processes will persist. Watercourses appear to form the primary connection as they are generally less modified and in a more natural state. It is likely that large natural vegetation patches are used as grazing and are likely to exhibit some level of degradation. Such areas more than likely also have marginal agricultural value, otherwise they would more than likely have been cultivated. Extensive areas are also maintained as dryland pastures that are periodically mowed for pastures. Old lands, having secondary vegetation, more than likely also have marginal agriculture value, hence they are no longer used. Such areas are potentially either rocky or exhibit seasonal waterlogging (i.e., wetlands or watercourses), both of which could provide habitat for a suite of flora and fauna that are not characteristic of the surrounding homogenous grassland. In other instances, some areas are likely also rested periodically for a few years, before being used again.

Intact vegetation on site is of conservation value, being designated Optimal CBA, with some corridors associated with watercourses being designated Irreplaceable CBA, due to the elevated conservation status of the vegetation unit (Vulnerable). Several areas have also been designated ESA (local corridor or species). As is evident from land-use coverages, the wider area is highly fragmented because of land-use, including agriculture, mining, industrial and urbanisation. The degraded, secondary vegetation (old lands) and cultivated areas are not any designated CBA status. Land use guidelines for the various categories indicate the following:

- Irreplaceable Terrestrial CBA sites must be avoided in terms of the mitigation hierarchy;
- Aquatic ESA: Important sub-catchments: Not recommended and should be avoided, unless no aquatic impact is confirmed;
- Aquatic: All rivers, wetlands, dams to be avoided including respective 32 m and 100 m buffers. Limited linear activities such as roads and powerlines may be required in these areas and should be assessed accordingly on a case-by-case basis in order to minimise impacts;
- Terrestrial ESA: local corridor and species areas must also be avoided in terms of the mitigation hierarchy. Further investigation may be required in the species area, to

ascertain species and processes, which may or may not accommodate certain infrastructure;

- Terrestrial Optimal CBA (referred to as Important and necessary in MBCP), the guidelines indicate that, although not desirable, if small-scale land-use change is unavoidable, it must be located and designed to be as biodiversity-sensitive as possible. It is thus feasible that a portion of the natural vegetation within the designated CBA (optimal) areas could be developed, in a biodiversity sensitive manner if combined with use of Other Natural Areas (ONA) or transformed areas. This would entail identifying any areas that are less sensitive as well as maintaining ecological connectivity across the site and with surrounding landscape, as well as adhering to conservation targets for the vegetation unit; and
- Terrestrial ONA and modified sites would provide the most suitable footprint for the proposed WEF facility. Old lands and current lands as well as areas where hay harvesting is periodically undertaken may require assessment by an agricultural specialist in order to determine an optimised footprint where agricultural sustainability of the site is not significantly altered, outside of the scope of this screening.

Preferred areas would thus be low aquatic and/or terrestrial sensitivity areas, followed by moderate sensitivity areas (where strategic footprints would need to follow a clear mitigation process and rationale). Other Natural areas, generally moderate sensitivity, would provide the most suitable footprint, but a blended approach is recommended, which will spread the footprint strategically over other natural areas and perhaps more marginal agricultural areas or partially overlapping with cultivated areas.

Several smaller footprints having a low/moderate sensitivity are not delineated, but these may be most suited for small footprints (i.e., WEF, substation or BESS infrastructure) connectivity with surrounding landscape should none-the-less be retained, which may include a buffer along any boundaries.

The recently published Biodiversity Offset Guidelines may have implications regarding the extent to which there are footprints within the CBA/ESA designated areas (red, orange and yellow on the MBSP map). Specifically relating to WEF projects, impact significance after mitigation tends to be low due to the dispersed nature of the footprint. In general ESA would be more accommodating to loss than CBA for a WEF.

Eastern Highveld Grassland has an Endangered status, with some remnant but fragmented patches on the site, the largest area being on Rochdale to the north, but also patches mostly around the western edges of Sheepmoor and the Eastern Edges of Emvelo. Biodiversity Offsets may be applicable, the red CBA areas on the map generally correspond to the remnant pockets of this unit, which are deemed Irreplaceable. Depending on final loss, Biodiversity Offsets may be applicable, but unlikely due to negligible footprint size of WEF turbines in relation to the remaining extent of the vegetation unit coupled with on-site degradation. Large areas of invaded wattle thicket are present and would provide opportunity for development as these would be considered significantly degraded.

The other vegetation unit which comprises most of the central and mountainous part of the site is Wakkerstroom Montane Grassland which has a least concern status. Intact areas have been designated a Moderate sensitivity.

Based on available ecosystem-level data for habitat and important biodiversity areas falling within the project development site, it is considered that the project will range from low to high sensitivity for the faunal SCC assessed. Based on the available species-level information on the two SCCs' distributions, their known habitat preferences, the intact and natural to heavily transformed habitat of the project development site, it is considered that the project will range from low to high sensitivity for the faunal SCC assessed.

The proposed development will most likely have a low impact within areas of low sensitivity (transformed areas), and a medium to high impact within areas of potentially high faunal sensitivity (intact natural habitat, ecological corridors, and certain landscape features). National and regional strategic biodiversity plans indicate that areas of the project site are of high faunal importance.

The project area falls over CBAs of different sub-categories, including ONAs and ESAs (local and landscape ecological corridors), classed by the Mpumalanga Biodiversity Sector Plan. The most important and optimal CBAs have been classed using, amongst other biodiversity datasets, several different animal datasets (e.g. butterfly, dragonfly, reptile, amphibian, and bird) and therefore are considered as an accurate representative of areas of general faunal importance.

The project area also bisects ecosystem types with a South African Red List of Ecosystems Status of Endangered and that still retain much of their natural extent.

The project area:

- Bisects a priority focus area identified by the national protected areas expansion strategy for South Africa (NPAES);
- Falls over a recognised South African Important Bird Area; and
- Has vegetation and habitat (topography) that support both the katydid and Oribi. In addition, the sighting of the Oribi by the avifaunal specialists, and after speaking with local landowners, confirms that this SCC most likely occurs at the project area and surrounding areas.

If the development is focused on Low sensitive areas, then potentially the development will only have small, localised impacts on the two SCC and additional surveys, such as micro-siting, and full impact assessments will likely not be necessary.

Within the proposed development, areas of High sensitivity are associated with:

- Intact areas of natural vegetation suitable for the SCC: These areas, and areas that have also been classed as of high importance within biodiversity spatial plans, should ideally be excluded from development and a ~100m proposed buffer line is recommended to prevent undue disturbance;
- Areas that provide important habitat features associated with altitude and topography, particularly for the Oribi. These areas should ideally be excluded from development and a ~100 m proposed buffer line is recommended to prevent undue disturbance of these areas;
- Areas that provide faunal connectivity through ecological/habitat corridors. These areas should ideally be excluded from development and a ~100 m proposed buffer

line is recommended for all corridors. In addition, these corridors would need to be considered within the broader context of the three planned WEFs to ensure that connectivity is maintained across the three development areas and surrounding areas; and

- All invasive alien plants should be cleared from the project site and a management and monitoring plan should be stipulated as part of the EMPr for the Emvelo WEF project. The threat from alien invasive plants constitutes a potentially greater threat and impact on faunal SCC than the impacts from the development. Removal and management of the invasive plants could potentially have a high positive impact for the SCC and other fauna within the project area.

If the above concerns can be accommodated, then a compliance statement of low sensitivity will potentially hold for Emvelo WEF.

11.5 AVIFAUNA

11.5.1 WIND ENERGY FACILITY

The proposed Emvelo WEF will have several potential impacts on priority avifauna. These impacts are the following:

- Displacement due to construction disturbance: During construction, priority species such as ground-nesting birds and the Southern Bald Ibis may be displaced due to disturbances, affecting their reproductive cycles. Some species might recolonize post-construction, but habitat fragmentation and turbine disturbances may reduce their densities. Impact is rated Medium pre- and post-mitigation.
- Displacement due to habitat transformation: Construction of roads will cause habitat fragmentation, affecting species in high-sensitivity areas, primarily larger terrestrial species and smaller, range-restricted species. Impact is rated Medium pre- and post-mitigation.
- Collision mortality from turbines during operation: Wind turbines pose a collision risk to species like bustards, cranes, storks, raptors, and others. The impact is rated High pre-mitigation and Medium post-mitigation.
- Electrocution on 33kV overhead lines during operation: Species such as raptors and owls are at risk of electrocution. Impact is rated Medium pre-mitigation and Low post-mitigation.
- Collisions with 33kV overhead lines during operation: Overhead lines pose a collision risk to species like cranes and owls. The impact is rated Medium pre-mitigation and Low post-mitigation.
- Displacement due to dismantling disturbance: Similar to construction phase impacts.
- Cumulative impacts: Including up to 45 turbines, Emvelo WEF will contribute to 202 potential turbines within a 35km radius, representing 22% of total planned turbines, leading to moderate to high cumulative impact. The total land area for renewable energy developments, including Emvelo WEF, is about 268.3 km², constituting 7% of the habitat available to birds in the area. The cumulative impact is moderate for creating high-risk zones and medium to low for habitat transformation.

For the proposed Emvelo WEF grid connection, potential impacts include:

- Displacement due to construction disturbance: Construction activities could disturb birds, especially ground-nesting species, leading to breeding failures. The impact is rated Medium pre-mitigation and Low post-mitigation.
- Displacement due to habitat transformation: Construction will transform habitats, affecting species breeding, foraging, and roosting in proximity. Impact is rated Medium pre-mitigation and Low post-mitigation.
- Collisions with overhead lines during operation: The 132kV OHL poses a collision risk to power line-sensitive avifauna. The impact is rated High pre-mitigation and Medium post-mitigation.
- Mortality due to electrocutions on grid connection infrastructure: Electrocution risk is determined by powerline voltage and pole design, primarily affecting larger species like the Cape Vulture. Impact is rated Medium pre-mitigation and Low post-mitigation.
- Displacement due to dismantling disturbance: Similar to construction phase impacts.
- Cumulative impacts: Existing HV lines within the 35km radius total about 300km. Including planned lines, the total is 383km, with the Emvelo WEF contributing 30km (8%). The cumulative collision impact of HV lines is high pre-mitigation and medium post-mitigation.

At this point in the process it can be concluded that there are no significant fatal flaws, and the project can proceed to the EIA phase from an avifaunal perspective. Impacts will be rated for significance during the EIA phase once final sensitivities are determined and the layout is updated.

11.6 BATS

This scoping report assessed impacts to bats that could occur because of the construction, operation and decommission of the Emvelo WEF and grid connection. The assessment was based on 12 months of baseline data on bat activity recorded at the project. Based on these data, the key issue for the WEF will be managing collision impacts to Cape serotine and Egyptian free-tailed bat.

The first mitigation measure proposed to manage risk is to adhere to the no-go buffers which aim to spatially avoid impacts by buffering key habitat features used by bats. This measure is likely to be effective for most bat species recorded at the project, but additional mitigation measures are needed to avoid impacts to free-tailed bats, which forage high in the air, and to reduce residual impacts. Turbine design can be effective, and it is recommended to maintain a minimum blade sweep of at least 30 m. However, free-tailed bats will still collide with turbine blades above this height and as such, the rotor diameter must be limited as much as practicable to minimise the space where collisions might occur. The specific dimensions will be investigated further during the EIA phase of the project. Additionally, blade feathering must be implemented to limit the rotation of turbine blades below the turbine cut-in speed when electricity is not being generated. Based on the proposed project development layout, turbine WTG 32 and the two laydown alternatives are located in no-go areas and this infrastructure must be relocated out of the no-go areas.

Mitigation measures to minimise residual impacts after the application of the above measures include curtailment and acoustic deterrents. As such, the project should consider the cost and feasibility of these measures during the EIA phase. The residual impacts must be monitored using post-construction fatality monitoring for a minimum of two years (Aronson et al. 2020). Curtailment and/or acoustic deterrents must be used if this monitoring indicates that species fatality thresholds have been exceeded (MacEwan et al. 2018) to maintain the impacts to bats within acceptable limits of change and prevent declines in the impacted bat populations.

11.7 SOCIO-ECONOMIC

The findings of the Social Scoping study indicate that the proposed Emvelo WEF project will create a number of social and socio-economic benefits, including creation of employment and business opportunities during both the construction and operational phase. In addition, the WEF will generate renewable energy for use by mines and industrial operations in the area.

The findings of the SIA also indicate that the potential negative impacts associated with both the construction and operational phase are likely to be Low Negative with mitigation. The potential negative impacts can therefore be effectively mitigated if the recommended mitigation measures are implemented. The Emvelo WEF is therefore supported by the initial findings of the Social Scoping study.

11.8 HERITAGE, ARCHAEOLOGY AND PALAEOLOGY

A heritage survey was undertaken for the proposed Emvelo WEF. The desktop study noted sixty-three possible heritage sites. Most of these were farm labourers' settlements that could have graves. Many of these sites occur in areas that will not be affected by the WEF and related infrastructure. The field survey recorded twelve heritage sites were recorded within the study area. Most of these sites will not be affected by the WEF. Those that are currently affected, can be mitigated by relocating the turbine.

The field survey also confirmed that most of the desktop settlements have human graves associated with them. A 50 m sensitivity buffer should be placed around each of these for possible graves. Unfortunately, the black wattle has damaged most of these sites, while agricultural activity would have destroyed these sites.

One cemetery will be currently affected by the laydown area. This area will need to be moved and the cemetery clearly demarcated before construction begins.

While the paleontology is of very high sensitivity as it forms part of the Vryheid formation, very few significant vertebrate fossils have been found in it. A Chance Find Protocol will need to be initiated for the construction phase.

11.9 VISUAL / LANDSCAPE AND FLICKER

The existing visual condition of the landscape that may be affected by the proposed Emvelo WEF and associated grid connection has been described. The study area's scenic quality has been rated high to low within the context of the sub-region. The Project site is in a moderate rated landscape type. Sensitive viewing areas and landscape types have been

identified and mapped, indicating potential sensitivity to the Project, mainly for users of the farmsteads, settlements and towns and the R65 and the N2 roads.

Impacts on views are the highest when viewers are sensitive to change in the landscape, and the view is focused on and dominated by the change. The Project's visual impact will cause moderate changes in the landscape that are noticeable to people viewing the Project.

Construction activities include the removal of vegetation, earthworks required to create building terraces for turbines and the preparation of the internal roads. Construction activities would negatively affect the landscape's visual quality and sense of place relative to its baseline. They would contrast with the patterns that define the structure of the immediate landscape and cause a significant change over a local to regional area, resulting in a moderate change to key views. However, the greatest impact would be on the site itself. Mitigation measures are minimal with the greatest effect only at night.

Operational activities include the regular cleaning and maintenance, vegetation management under and around the turbines and powerline servitudes as well as maintenance of all other infrastructural components. Security lighting and other lighting associated with the movement of security vehicles at night. These activities along with the physical presence of the Project components day and night, constitute the visual impact.

Decommissioning and closure activities include the dismantling and removal of all infrastructure and the rehabilitation of the site back to its current, mostly natural, state.

11.10 TRAFFIC AND TRANSPORTATION

Based on the nature and extent of the proposed Emvelo WEF development, some level of disturbance can be expected on the immediate road network and regionally because of the construction and operational phases. The overall potential impact is expected to be moderate to low during both the construction phase and operational phase, respectively.

During the site visit it was observed that the Provincial Road R65 carries lower traffic volumes than the N2 National Road which already carries a high proportion of trucks including abnormal vehicles. Thus, the preferred local transportation route is the R65 due to its substantially lower existing traffic volumes.

It is the opinion of the traffic engineering project team that the impacts associated with the project can be assessed and mitigated to an acceptable level to meet the recommended norms and standards.

11.11 PRELIMINARY SITE SENSITIVITY EVALUATION

Sensitive areas will be reassessed in the EIA phase, and will be based on additional site visits, where necessary. The majority of the turbines are currently out of no-go areas, however, some turbines were found to be within proximity to noise sensitive receptors as well as some features of heritage significance. Noise and heritage buffers will be included in the EIA phase. Visual buffers were delineated but not considered no go areas. In terms of bat no-go areas, one turbine is located in a no-go area and would need to be relocated.

11.12 CONCLUSION

Based on the outcome of the specialist scoping inputs, potential negative impacts associated with the proposed development are anticipated mainly to be of medium to low significance after mitigation, while some positive socio-economic impacts of moderate significance are expected. Areas of concern have been noted, specifically in the Cultural Heritage, Avifauna, Noise and Visual / Landscape themes, where buffers need to be implemented.

Based on the preliminary assessment of impacts for the proposed development the Environmental Assessment Practitioner (EAP) can conclude that **the project should be allowed to proceed into the EIA phase**. The specialist's assessments have identified areas of further investigation, and these will be assessed during the EIA phase, together with any additional impacts or concerns raised during the public participation process. A **preliminary layout** was produced and provided to specialists for consideration during the scoping phase. This layout will be revised further during the EIA phase of the process to be informed by buffers and constraints provided by specialists. Any additional constraints and buffers recommended by the specialists during the EIA phase, will be taken into consideration and a **Final Mitigated Layout will be produced and submitted as part of the Final EIA Report**. Comments received from I&APs during the public participation comment period will be taken into consideration to inform the final EIA.

12. PLAN OF STUDY FOR EIA

A detailed description of the nature and extent of the proposed Emvelo WEF and its associated infrastructure, details regarding the Scoping process followed, as well as the issues identified and evaluated through the Scoping Phase have been included in this Scoping Report. This Section of the report provides the Plan of Study for the Environmental Impact Assessment (EIA) for the proposed development.

The EIA Phase of the study includes detailed specialist studies for those impacts recorded to be of potential significance, as well as on-going public consultation.

12.1 AIM OF THE EIA PHASE

The EIA Phase will aim to achieve the following:

- Provide a detailed assessment of the need and desirability of the proposed development, taking into consideration I&AP comments, specialists studies, as well as guidance documents;
- Provide an overall assessment of the social and biophysical environment affected by the proposed development;
- Assess potentially significant impacts (direct, indirect and cumulative impacts) associated with the proposed development;
- Identify and recommend appropriate mitigation measures for potentially significant environmental impacts;
- Undertake a fully inclusive public involvement process to ensure that I&AP's are afforded the opportunity to participate, and that their issues and concerns are recorded.
- Address potential environmental impacts and benefits associated with all components of the of the proposed development including the design, construction, operation and decommissioning; and
- Develop an EMPr which will be required to be implemented during the phases of the development.

The EIA report will aim to provide the CA with sufficient information to make an informed decision regarding the proposed development. All feasible alternatives (including the no-go alternative) will be assessed.

12.2 CONSIDERATION OF ALTERNATIVES

The following alternatives will be investigated in the EIA:

- The 'do nothing' or no-go alternative;
- Layout alternative;
- Design alternatives; and
- Alternative technologies (i.e., various wind turbine options).

12.3 AUTHORITY CONSULTATION

Consultation with the regulatory authority (i.e., DFFE and Mpumalanga Provincial Department) will be undertaken and will continue throughout the EIA process. On-going consultation will include the following:

- Submission of the Final Scoping Report following a 30-days public review period (and considering of comments received);
- Submission of the draft EIA Report for a 30-days public review period, as well as the final report including all comments received; and
- Consultation and site visit (if required) with the authorities (DFFE) in order to discuss the findings and conclusions of the EIA Report.

12.4 PUBLIC PARTICIPATION PROCESS

A public participation process will be undertaken by ERM in accordance with the requirements of the EIA Regulations. Consultation with key stakeholders and I&APs will be on-going throughout the EIA process. Through this consultation process, stakeholders and I&APs will be encouraged to provide input to the project, and to comment on the findings of the EIA process.

The EIA Report will be made available for public review for a 30-day period prior to the finalisation and submission to the DFFE for review and decision-making. Comments received during the review period will be captured and addressed the comment and responses report which will form part of the final EIA Report will be submitted to the DFFE for decision making.

12.5 METHODOLOGY OF ASSESSMENT OF POTENTIAL IMPACTS

The potential impact that the proposed development may have on each environmental receptor could be influenced by a combination of the sensitivity or importance of the receptor and the predicted degree of alteration from the baseline state (either beneficial or adverse).

Environmental sensitivity (or importance) may be categorised by a multitude of factors, such as the rarity of the species; transformation of natural landscapes or changes to soil quality and land use. The overall significance of a potential environmental impact is determined by the interaction of the above two factors (i.e., sensitivity/importance and predicted degree of alteration from the baseline).

A 7-step approach for the determination of significance of potential impacts was developed by ERM to align with the requirements of Appendix 3 of the EIA Regulations, 2014 (as amended). This 7-step approach was adapted from standard ranking metrics such as the Hacking Method, Crawford Method etc. and complies with the method provided in the EIA guideline document (GN 654 of 2010) and considers international EIA Regulatory reporting standards such as the newly amended European Environmental Impact Assessment (EIA) Directive (2014/52/EU).

Specialists, in their terms of references, will be supplied with this standard method with which to determine the significance of impacts to ensure objective assessment and evaluation, while enabling easier multidisciplinary decision-making.

The approach is both objective and scientific based to allow appointed specialists and EAPs to retain independence throughout the assessment process. This methodology is included in the following subsections.

12.5.1 PREDICTION OF POTENTIAL IMPACTS

The prediction of potential impacts covers the three phases of the proposed development: construction, operation and decommissioning. During each phase, the potential environmental impacts may be different. For example, during the construction phase, traffic volumes are far greater than during the operational life of a WEF.

The project team has experience from environmental studies for other projects in the locality of the proposed development. The team is, therefore, able to identify potential impacts based on their experience and knowledge of the type of development proposed and the local area. Their inputs inform the scope for the S&EIA process.

Each specialist assessment considered:

- The extent of the impact (local, regional or (inter) national);
- The intensity of the impact (low, medium or high);
- The duration of the impact and its reversibility;
- The probability of the impact occurring (improbable, possible, probable or definite);
- The confidence in the assessment; and
- Cumulative impacts.

Following identification of potential environmental impacts, the baseline information was used to predict changes to existing conditions and undertake an assessment of the impacts associated with these changes, which will also inform the PSEIA.

12.5.1.1 ASSESSMENT OF POTENTIAL IMPACTS

The potential impact that the proposed development may have on each environmental receptor could be influenced by a combination of the sensitivity or importance of the receptor and the predicted degree of alteration from the baseline state (either beneficial or adverse).

Environmental sensitivity (or importance) may be categorised by a multitude of factors, such as the rarity of the species; transformation of natural landscapes or changes to soil quality and land use. The overall significance of a potential environmental impact is determined by the interaction of the above two factors (i.e., sensitivity/importance and predicted degree of alteration from the baseline).

The potential impact that the proposed development may have on each environmental receptor could be influenced by a combination of the sensitivity and importance of the receptor and the predicted degree of alteration from the baseline state (either beneficial or adverse).

Environmental sensitivity (and importance) may be categorised by a multitude of factors, such as the rarity of the species; transformation of natural landscapes or changes to soil quality and land use.

The overall significance of a potential environmental impact is determined by the interaction of the above two factors (i.e., sensitivity/importance and predicted degree of alteration from the baseline).

Specialists, in their terms of references, were supplied with a standard method with which to determine the significance of impacts to ensure objective assessment and evaluation, while enabling easier multidisciplinary decision-making. The methodology¹⁹ as outlined below indicates the categories for the rating of impact magnitude and significance.

The assessment methodology that was used is in accordance with the EIA Regulations, 2014 (as amended). The significance of environmental impacts is a function of the environmental aspects that are present and to be impacted on, the probability of an impact occurring and the consequence of such an impact occurring before and after implementation of proposed mitigation measures.

Extent (special scale)

L	M	H
Impact is localised within site boundary	Widespread impact beyond site boundary; Local	Impact widespread far beyond site boundary; Regional/national

Duration

L	M	H
Quickly reversible, less than project life, short term	Reversible over time; medium-term to life of project	Long term; beyond closure; permanent; irreplaceable or irretrievable commitment of resources

Intensity

Type of Criteria	Negative			Positive		
	H-	M-	L-	L+	M+	H+
Qualitative	Substantial deterioration death, illness or injury, loss of habitat/diversity or resource, severe	Moderate deterioration, discomfort, Partial loss of habitat/biodiversity/resource or slight alteration	Minor deterioration, nuisance or irritation, minor change in species/habitat/diversity or	Minor improvement, restoration, improved management	Moderate improvement, restoration, improved management, substitution	Substantial improvement, substitution

¹⁹ Adapted from T Hacking, AATS – Envirolink, 1998: An innovative approach to structuring environmental impact assessment reports. In: IAIA SA 1998 Conference Papers and Notes.

	alteration or disturbance of important processes.		resource, no or very little quality deterioration.			
Quantitative	Measurable deterioration Recommended level will often be violated (e.g., pollution)	Measurable deterioration Recommended level will occasionally be violated	No measurable change; Recommended level will never be violated	No measurable change; Within or better than recommended level.	Measurable improvement	Measurable improvement

Probability of Occurrence

L	M	H
Unlikely; low likelihood; Seldom No known risk or vulnerability to natural or induced hazards.	Possible, distinct possibility, frequent Low to medium risk or vulnerability to natural or induced hazards.	Definite (regardless of prevention measures), highly likely, continuous High risk or vulnerability to natural or induced hazards.

Status of the Impact

The specialist should describe whether the impact is positive, negative or neutral for each parameter. The ranking criteria are described in negative terms. Where positive impacts are identified, the opposite, positive descriptions for criteria will be used.

Degree of Confidence in Predictions

The degree of confidence in the predictions, based on the availability of information and specialist knowledge, is to be stated.

Consequence: (Duration x Extent x Intensity)

Having ranked the severity, duration and spatial extent, the overall consequence of impacts is determined using the following qualitative guidelines:

Intensity = L				
Duration	H			
	M			Medium
	L	Low		

Intensity = M

Duration	H			High
	M		Medium	
	L	Low		

Intensity = H

Duration	H			
	M			High
	L	Medium		
		L	M	H
		Extent		

Positive impacts are ranked in the same way as negative impacts but result in high, medium or low positive consequence.

Overall significance of impacts

Combining the consequence of the impact and the probability of occurrence provides the overall significance (risk) of impacts.

PROBABILITY	Definite Continuous	H	MEDIUM		HIGH
	Possible Frequent	M	MEDIUM		
	Unlikely Seldom	L	LOW		MEDIUM
			L	M	H
		CONSEQUENCE			

Mitigation Measures

Measures to avoid, reduce or remedy significant adverse impacts identified, are termed mitigation measures. Where the assessment process identifies any significant adverse impacts, mitigation measures are proposed to reduce those impacts where practicable. Such measures include the physical design and operational measures. Design alterations such as the route of the servitude to avoid certain sensitive receptors are mitigation embedded into the design of the proposed development, i.e., embedded mitigation.

This strategy of avoidance, reduction and remediation is a hierarchical one which seeks:

- First to avoid potential impacts;
- Then to reduce those which remain; and
- Lastly, where no other measures are possible, to propose compensatory measures.

Each specialist consultant identified appropriate mitigation measures (where relevant).

12.5.1.2 CUMULATIVE IMPACT ASSESSMENT

In accordance with the EIA Regulations, consideration is also given to 'cumulative impacts'.

Cumulative impacts are those that result from incremental changes caused by past, present or reasonably foreseeable future actions together with the proposed development. Cumulative impacts are the combined impacts of several developments that are different to the impacts from the developments on an individual basis. For example, the landscape impact of one WEF may be insignificant, but when combined with another it may become significant.

For this assessment cumulative impacts are defined and will be assessed in the future baseline scenario, i.e., cumulative impact of the proposed development = change caused by proposed development when added to the cumulative baseline. The cumulative baseline includes all other identified developments. In the cumulative assessment the effect of adding the proposed development to the cumulative baseline is assessed.

In line with best practice, the scope of this assessment will include all operational, approved or current and planned renewable energy applications (including those sites under appeal), within a 35 km radius of the site. Therefore, all potential projects are included, even though it is unknown how many of these will be constructed.

Renewable energy sites included for cumulative impact assessment are based on the knowledge and status of the surrounding areas at the time of the specialists compiling their assessments, these will be updated as applicable through the EIA process.

A preliminary assessment of cumulative impacts has been made in the Scoping Phase and will be assessed further in the EIA Phase.

12.6 SPECIALIST PLAN OF STUDY

12.6.1 SOIL AND AGRICULTURAL POTENTIAL

Compliance with the allowable development limits will be assessed in the EIA phase, once the footprint of the facility has been finalised.

The agricultural protocol requires confirmation that all reasonable measures have been taken through micro-siting to minimize fragmentation and disturbance of agricultural activities. An aspect of wind farm layout that can cause unnecessary fragmentation of croplands is the location of turbine access roads within croplands. This will be assessed in the EIA phase.

12.6.2 FRESHWATER AND WETLANDS (AQUATICS)

The DFFE Screening Tool identified two sensitivity ratings within the development footprint, namely, Low and Very High. There is overlap with the findings on site and the Screening Tool's outcome, thus the development footprint must be developed with cognisance of these sensitivities.

Therefore, environmental sensitivity input received from the aquatic ecology specialist was taken forward and considered within the EIA process and the impact to these areas assessed. Appropriate layout and development restrictions were implemented within the development footprint to ensure that the impact to aquatic ecology is deemed acceptable by the aquatic ecologist. However, it is assumed that the final layout will orientate the hardstands, crane pads, blade laydowns and construction camps outside of any of the No-Go areas. The current preferred laydown area is located within a sensitive aquatic areas and will need to be adjusted.

The specialist has no objection to the authorisation of the proposed activities assuming that all mitigations and buffer zones are implemented.

Mitigation should focus on these areas and include measures to halt erosion and rehabilitate habitat in the sections affected by the construction. Without the implementation of mitigation measures, the project has potential to cause a Low cumulative impact upon aquatic biodiversity. However, with the adoption of mitigation, the proposed project will have a Very Low impact upon aquatic biodiversity.

12.6.3 TERRESTRIAL BIODIVERSITY (FLORA AND FAUNA)

The approach to be implemented during the assessment phase will include the following, as well as in accordance with the respective terrestrial biodiversity and species reporting protocols:

- Undertake a comprehensive desktop study to identify potential risks for terrestrial biodiversity inclusive of the national screening tool, relevant regional biodiversity planning frameworks, any previous studies as well as interrogation of applicable databases.
- Undertake seasonal site visits including a preliminary site visit to inform layout design, specifically in terms of broader landscape processes, followed by a more comprehensive site visit to assess the specific layout, and to provide recommendations accordingly.
- Detailed reporting will be comprised of a Terrestrial Biodiversity and Aquatic Screening Report. The screening report will address the following (in line with the gazetted Assessment Protocol requirements):

- Indicate any assumptions made and gaps in available information. Assessment of all the vegetation types and habitat units within the relevant Regional Planning Frameworks.
- A desktop-based species list (flora and fauna) highlighting any potential species of special concern categories (endemic, threatened, Red Data species and other protected species requiring permits for destruction/relocation and invasive/exotic weeds) that could be present. Indicate the need for any permitting/licensing or detailed studies that may be required. Site visit will include limited screening for species, but being out of season, it will be limited.
- Aquatic screening will serve to identify and preliminarily assess aquatic features and processes including watercourses and wetlands and recommend no-go areas associated with these features.
- Description and assessment of the vegetation/habitat units and site sensitivities ranked into very high, high, medium, low, or very low classes based on potential sensitivity and conservation importance using a standardised methodology (desktop based).
- A site ecological sensitivity map will be compiled, indicating the sensitivities as described above, inclusive of any aquatic features as far as possible using most recent available aerial photography. No site verification will be conducted.
- A map indicating any buffers to accommodate Regional Planning requirements (if required).
- Recommendations based on the findings of the assessment.

This terrestrial biodiversity Scoping Report is aligned with the requirements of 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, when applying for EA (GN 320, 20 March 2020).

12.6.4 AVIFAUNA

The following are proposed for the EIA Phase:

- The implementation of four avifaunal surveys, utilising transects, vantage point watches, focal points, and incidental counts, to inform the assessment of the potential impacts of the planned infrastructure within the development footprint. (Note: This site work has already been completed. During the EIA phase the data will be further analyzed to consider and rate/assess potential impacts of the finalized layout). The monitoring protocol is guided by the following:
 - 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 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.

- The avifaunal specialists report will be structured around the following terms of reference:
 - Description of the affected environment from an avifaunal perspective.
 - Discussion of gaps in baseline data and other limitations.
 - Description of the methodology that was used for the field surveys.
 - Comparison of the site sensitivity recorded in the field with the sensitivity classification in the DFFE National Screening Tool and adjustment if necessary.
 - Provision of an overview of all applicable legislation.
 - Provision of an overview of assessment methodology.
 - Martial Eagle Modelling – refinement of buffer zones.
 - There is potential for a Critically Endangered wetland species to occur in the area (Species 23), further habitat modelling and investigation will be conducted during the EIA phase of the project.
 - Further habitat modelling and investigation will also be conducted for other key grassland species (e.g. larks and pipits).
 - Identification and assessment of the potential impacts of the proposed development on avifauna including cumulative impacts.
 - Provision of sufficient mitigation measures to include in the EMPr.
 - Conclusion with an impact statement whether the wind energy facility is fatally flawed or may be authorised.

12.6.5 BATS

The proposed project can be approved to continue to the EIA phase, considering that the overall impact to bats was assessed as moderate after the application of the mitigation measures proposed to avoid and minimise impacts to bats. However, on a species level, the project presents differential risk and impacts to bats must be managed adaptively during the operational phase, particularly for those species (e.g. Egyptian free-tailed bat and Cape serotine) for which high risk is predicted during some periods. This adaptive management will be guided by the Environmental Management Programme for bats which must include the development of a Biodiversity Management Plan (BMP) to manage impacts to bats during the operation of the facility.

The BMP for bats must be developed by a bat ecologist before the commencement of operation and must include the post-construction fatality monitoring plan design, fatality thresholds calculations and rationale, a curtailment plan, and an adaptive management response plan that provides a timeous action pathway for mitigation, including roles and responsibilities, should fatality thresholds be exceeded.

12.6.6 VISUAL / LANDSCAPE AND FLICKER

The significance of these high-level impacts must be further investigated and rated in the Assessment Phase of the ESIA using computer modelling techniques that establish visibility

(viewshed analyses), shadow flicker and visual intrusion using simulations representative of Project activities. The results of the I&AP process will also be known, which will establish receptor sensitivity to the Project.

The following issues will be addressed:

- Establish/confirm public concern for the WEF, specifically as it concerns visual issues;
- Confirm the visibility and visual intrusion of project activities using computer modelling techniques (viewshed analyses and photomontage simulations and flicker analysis); and
- Establish specific management measures (mitigation) to reduce the anticipated impact of the Project where appropriate.

12.6.7 HERITAGE, ARCHAEOLOGY AND PALAEOLOGY

The chance of significant fossils being found on this site are Low, but not Zero. Consequently a "Chance Find Protocol" has been included to cover this eventuality.

No further paleontological work is required, unless triggered by the "Chance Find Protocol", which must form part of the EMPr for the site'

12.6.8 NOISE

The following will be undertaken during the EIA phase:

- Data (layout and SPL of selected WTG) as received from the developer will be used to model the potential noise impact. The following information will be considered:
 - The SPL details of a WTG that may be used at this WEF;
 - The latest WEF layout to be assessed;
 - The surface contours of the project focus area;
 - Surface and meteorological constants;
- The potential noise impact will be evaluated (where possible) in terms of the nature (description of what causes the effect, what/who might be affected and how it/they might be affected), as well as the extent of the noise impact for the construction and operational phases;
- The potential significance of the identified issues will be calculated based on the evaluation of the issues and / or impacts;
- The development of an EMPr and a proposal of potential mitigation measures (if required); and
- Recommendations.

Further study is required, and it is recommended that a full Environmental Noise Impact Assessment study be conducted for the WEF.

12.6.9 SOCIO-ECONOMIC

The proposed approach to the SIA is based on the Guidelines for SIA endorsed by Western Cape Provincial Environmental Authorities (DEA&DP) in 2007. The Guidelines are based on accepted international best practice guidelines, including the Guidelines and Principles for

Social Impact Assessment (Inter-organizational Committee on Guidelines and Principles for Social Impact Assessment, 1994) and IAIA Guidance for Assessing and Managing Social Impacts (2015). The approach to the study will involve:

- Collection and review of reports and baseline socio-economic data on the area. This includes socio-economic characteristics of the affected areas, current and future land uses, and land uses planning documents relating to the study area and surrounds.
- Identification of the components associated with the construction and operational phase of the proposed project, including estimate of total capital expenditure, number of employment opportunities created and breakdown of the employment opportunities in terms of skill levels (low, medium and high skilled), breakdown of wages per skill level, assessment procurement policies etc.
- Site visit and interviews with key affected parties, including local communities, local landowners, key government officials (local and regional), the client, local farmers associations, tourism and conservation officials, chamber of commerce etc.
- Review of key findings of the key specialist studies that have a bearing on the SIA, such as the Visual Impact Assessment (VIA). This information will also be used to inform the engagement with the affected landowners.
- Identification and assessment of key social issues and assessment of potential impacts (negative and positive) associated with the construction, operational and decommissioning phase of the project.
- Identification and assessment of cumulative impacts (positive and negative).
- Identification of appropriate measures to avoid, mitigate, enhance, and compensate for potential social impacts.
- Preparation of Social Impact Assessment (SIA) Report.

Interviews will be undertaken with key stakeholders and interested and affected parties during the EIA phase.

12.6.10 TRAFFIC AND TRANSPORTATION

The proposed development of the WEF will have a notable increase in traffic volumes on the road network during the peak construction phase. The EIA phase will provide the assessment of these impact of these additional traffic volumes, on the road network within the study area.

In accordance with the purpose of Scoping, the environment in the project area was primarily assessed through site visits and appraisals, desktop screening, incorporating existing information from previous studies, and input received from client/authorities. A refinement of all maps will also be undertaken in the EIA phase, if necessary.



APPENDIX B FIGURES



APPENDIX A EAP'S DECLARATION OF INTEREST AND
CURRICULUM VITAE



APPENDIX C SPECIALIST REPORTS



APPENDIX D PUBLIC PARTICIPATION REPORT



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