

**APPENDIX F6**

**COMMENTS RECEIVED ON DRAFT REPORT**

## Amy Barclay

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**From:** ~~Mark H. <markh@victor.co.za>~~  
**Sent:** Thursday, 10 December 2020 07:00  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Subject:** rheboksfontein w/farm IAP

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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Please acknowledge receipt of my IAP registration in the name/details below

Many thanks

~~Mark Harkin~~  
~~Randburg Farm~~  
~~210 Bay 70~~  
~~Daring~~  
~~7545~~  
~~Tel: 022 797 5155~~  
~~email: mark.hitt@desm.za~~

## Amy Rawlins

---

**From:** ~~Mark H. Muckitt@clm.co.za~~  
**Sent:** Thursday, 10 December 2020 08:00  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Subject:** rheboksfontein w/farm IAP

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Please acknowledge receipt of my IAP registration in the name/details below

Many thanks

~~Mark Muckitt~~  
~~Randburg Farm~~  
~~P.O. Box 79~~  
~~Darling~~  
~~7545~~  
~~Tel: 022 492 5185~~  
~~email: muckitt@clm.co.za~~



## WEST COAST BIRD CLUB

~~PO Box 1404, Vredenburg 7380~~

Affiliated To Birdlife South Africa

From, ~~Keith Harrison, Conservation~~

~~P.O. Box 538, Tel, 022 7133026.~~

~~Vredenburg, Email. koithhbharrison@lando.co.za~~

7380,

To, Amy Barclay, Tel, 021 – 6815400,

ERM, 1<sup>st</sup> Floor, Great Westerford, Email, Engie.Rheboksfontein@erm.com

240 Main Road, Rondebosch 7700,

Cape Town.

12.01.2021.

Ref, Part Two Environmental Authorisation Amendment for the  
Rheboksfontein Wind Energy Facility.

ERM Project No. 0547329

DEA Ref,12/12/20/1582

Dear Amy Barclay,

The link between my computer and your link eventually was successful.

The West Coast Bird Club agrees with the project in principle but since the first application there have risen several questions concerning the infrastructure of the site:-

1. Effect upon birds, the report on the Radar survey is interesting and the possible reduction in Great White Pelican mortality and probably of other priority species on the flyway from Dassen to the mainland. However there is no mention of the numbers of possible mortality of resident species. There is research being carried out recording the dead birds collected from a series of WEFs throughout South Africa and the average kill in South Africa per turbine is 4.43 birds per year of all species. The presence of Black Harrier as a priority species is noted. There is an important breeding site at the horse racing stables south of the area and this species is currently featuring highly in two other WEFs on the West Coast.

2. To reduce bird collisions on the site:-
  - a) All service cables to be buried where possible.
  - b) Outside electric lights to be motion activated, and yellow coloured LED system with the beams directed downwards, so as not to attract night flying insects and night flying insectivore bird species.
  - c) Buildings preferably should be Red, a colour which birds see best, also yellow. Black and White birds do not see.
  - d) Glass windows to be frosted or with blinds, so that birds cannot see through or see reflections.
  - e) Glad to read that one blade to be painted black is recommended.
3. Vegetation:-
  - a) Where the project destroys an important area of vegetation, the Developer must bear the cost of conserving a similar portion of local vegetation known as an Off Set. Search and rescue operations to be carried out.
  - b) *Echium plantigeum*, an alien species infesting the Western Cape. The ECO during construction AND production to allow only and record vehicles containing soil, sand or gravel from Echium free sites onto the Project Area. The site to be maintained Echium free because Echium is a1B, invasive plant and by law, land owners are required to remove.
  - c) Control of alien vegetation, there are local teams available, trained by local NGOs, for example the Cape West Coast Biosphere Reserve Co. Cut alien vegetation must be removed from the site as soon as possible, because seeding plants will lead to increasing the alien seed bank.  
Where reseeding is necessary, seed must be sourced and recorded from originating within the Western Cape.
4. Fences:-

In order that resident fauna can maintain access to the developed area, designed access points for large mammals must be engineered in the perimeter fence. When chain mesh fencing is used, at specified areas the fence must be raised off the ground to allow access to small mammals and reptiles. When electrified fencing is employed, the lowest live wire must be more than 30cms off the ground to protect burrowing animals and tortoises which on contact freeze and are electrocuted.
5. Semiskilled and unskilled labour to be recruited from Darling or Mamre with 5 years proven residence or are on the voters roll.
6. Vehicles of the Developer, Contractors and Sub-contractors should be registered with the local Traffic Department so that some of the licence fees can be used for road infrastructure maintenance.
7. Effect upon Bats.

Bats are severely affected by WEFs, in order to reduce the possibility of collisions and barotrauma it should be noted that bats do not fly:-  
At air temperatures below 11 degrees C.  
If the rainfall for the night is more than 4mm.  
When the wind speed is more than 9 metres per second.

8. Animal Problems:-

Feral Cats are the major bird killers worldwide, and are attracted to large new projects, the ECO to set up a protocol for control of these animals.

Poaching, Gambling syndicates are now hunting large mammals with packs of dogs, on the West Coast. These groups are dangerous to approach; therefore the ECO must set up a protocol with the CapeNature office at Porterville.

Sincerely,

Keith Harrison.

(Sent by Email 15.01.2021)

## Amy Rawlins

---

**From:** ~~Keith <keithhharrison@lunds.co.za>~~  
**Sent:** Friday, 01 January 2021 12:07  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Subject:** Registration

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Please register :-

West Coast Bird Club as an IAP to the Rheboksfontein Wind Energy Facility ERM Ref, 0554699.

Contacts:-

West Coast Bird Club, - Conservation.

~~Keith Harrison,~~

~~P.O. Box 538,~~

~~Wederburg 7380.~~

~~Tel: 022 719 9828~~

~~Email: [keithhharrison@lunds.co.za](mailto:keithhharrison@lunds.co.za)~~

I have attempted unsuccessfully to obtain a copy from the ERM Web.

Regards,

Keith Harrison.

## Amy Rawlins

---

**From:** ~~Keith Harrison@landover~~  
**Sent:** Friday, 15 January 2021 12:46  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Cc:** ~~Simon de Rooy, Paton Angus, Gill Stewart~~  
**Subject:** Rheboksfontein WEF  
**Attachments:** WCBC - Comment Rheboksfontein No. 2.docx

**Follow Up Flag:** Follow up  
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Hi Amy Barclay,  
Attachment comments for Rheboksfontein No 2 Public Participation Process.  
Regards,  
Keith Harrison.



## Amy Rawlins

---

**From:** ~~Sam Rawlins <energy@birdlife.org.za>~~  
**Sent:** Friday, 29 January 2021 11:40  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Subject:** Re: Public Participation Process for the Part Two EA Amendment for the Rheboksfontein Wind Energy Facility  
**Attachments:** BLSA Comment on Rheboksfontein ammendment2021.pdf; Black Harriers & Wind Energy Final.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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Good day

Please see the attached comments from BirdLife South Africa.

Kind regards

Sam

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**From:** ERM South Africa – Engie Rheboksfontein EIA <[Engie.Rheboksfontein@erm.com](mailto:Engie.Rheboksfontein@erm.com)>  
**Sent:** Wednesday, 09 December 2020 18:55  
**To:** ERM South Africa – Engie Rheboksfontein EIA <[Engie.Rheboksfontein@erm.com](mailto:Engie.Rheboksfontein@erm.com)>  
**Subject:** Public Participation Process for the Part Two EA Amendment for the Rheboksfontein Wind Energy Facility

Dear stakeholder

Notice is hereby given that the Draft Amendment Report for the above mentioned project is available for comment. The report is available as detailed below for the period **10 December 2020 to 30 January 2021** (ie a 30-day comment period).

The Draft Amendment Report will be made available at:

- Darling Public Library
- Swartland Municipal Office (Tourism Bureau), 46 Main Road, Yzerfontein
- ERM Website: <https://www.erm.com/rheboksfontein-eia/>

You are invited to submit your comments and/or queries on the report to ERM. Please refer to the attached letter for more information.

Yours sincerely

**The ERM Team**

Amy Barclay  
ERM  
240 Main Road,  
Rondebosch 7  
700,  
Cape Town.  
By email: Engie.Rheboksfontein@erm.com

29 January 2021

Dear Amy,

**Re: Application of a Part Two Environmental Authorisation Amendment for the Rheboksfontein Wind Energy Facility.**

DEA Ref,12/12/20/1582

Thank you for the opportunity to comment on the above application.

The environmental authorisation was initially granted for the proposed project in 2012, based on an EIA and avifaunal impact assessment that was inadequate by today's standards. It does not comply with international or local best practice. Between 2011-2012 (pre-construction monitoring) and eight months between 2013 and 2014 (radar study) additional data was collected. These data indicated that the risk to Great White Pelican (*Pelecanus onocrotalus*, Vulnerable), Black Harrier (*Circus maurus*, Endangered and endemic), Martial Eagle (*Polemaetus bellicosus*, Endangered), African Marsh Harrier (*Circus ranivorus*, Vulnerable) and Greater Flamingo (*Phoenicopterus ruber*, Near Threatened) was **more significant than initially assessed**.

Some species' conservation status also changed during that period –this important **new information** was not available when the project was authorised. Our knowledge of which species are at risk and how to avoid and mitigate these risks has also improved.

This has created a problematic situation where a project has been granted environmental authorisation, but could have significant environmental impacts—a prime example of why environmental authorisations should only be valid for a limited time.

Over the years, both BirdLife South Africa and CapeNature have engaged with the applicant to express out concerns about this project. BirdLife South Africa remains of the opinion that this is an undesirable location for a wind energy facility. Our concerns with the proposed development and the amendment application, are summarised below.

1) *Outdated data:*

It does not appear that an avifaunal specialist has surveyed the site since 2014. Therefore, we are concerned that the "Avifauna Verification, and Assessment Update" report is based on **outdated** and **incomplete information**. We are of the opinion that site must be re-surveyed by an avifaunal specialist.

2) *Impacts on Great White Pelican*

We remain concerned about the potential impacts on Great White Pelican (*Pelecanus onocrotalus*, Vulnerable). The site is close to Dassen Island, the only breeding site for Great White Pelican in the region. The proposed wind farm directly within a flyway used by provisioning pelicans as they commute

to and from the island – and often these flights are powered by lift created by the unique topography of the area.

There is debate about the number of pelicans that are likely to be killed at the proposed facility, but the avifaunal studies agree that fatalities of this threatened species are likely to occur.

When calculating the collision risk, the updated report uses a study by Hatten et al. 2017 to justify applying a high avoidance rate (i.e. 98%). The paper details are not included in the reference list, and we have not been able to find it online. We have the following questions: a) Did Hatten et al. calculate the avoidance rate for pelicans at the Romanian site or was this presumed to be 98% by Mr Wright? b) Are the Romanian site's conditions comparable to those at Rheboksfontein? For example, is the predominate type of flight (i.e. soaring, gliding or powered) the same at both sites? c) Did the pelicans in the Romanian study demonstrate macro-avoidance (i.e. avoidance of the wind farm), or micro avoidance (avoidance of turbines)? If it was the former - how might this affect breeding birds at Dassen Island?

The updated assessment notes that the pelican population on Dassen Island is already declining. The report suggests that the proposed development would cause a "slight increase" in the speed of the population decline (this is not quantified) and implies that adding fatalities to an already declining population is not cause for concern. This is flawed logic. We cannot condone activities that will add further pressure to a declining population of a threatened species and we suggest a precautionary approach must be adopted.

We are further concerned that the updated assessment only presents the results of an average collision-risk scenario, with high avoidance rates. We suggest that it would be more helpful to highlight uncertainty and present a range of possible outcomes under different scenarios (i.e. different avoidance rates, wind speed and flight speed, as indicated in Jenkins et al. 2014). What is the worse - and best-case fatality rate we could expect and how might this affect the population?

### 3) Impacts on Martial Eagle

The presence of breeding Martial Eagles (*Polemaetus bellicosus*, Endangered) could have major implications for the impact assessment and mitigation strategy. While it can be useful to draw on local knowledge, we are of the opinion that **the absence of breeding Martial Eagles should be verified** by an ornithologist. When last was the nest occupied? What was the likely reason for it being abandoned? How likely is it that it will be reused during the lifespan of the proposed facility?

The **recommended extent of the Martial Eagle nest buffer must also be reconsidered**, clearly motivated and supported by the best available science. We note that buffer proposed in the updated assessment is smaller than recommended by most bird specialists in South Africa today.

### 4) Impacts on Black Harrier

The updated avifaunal assessment glosses over the **potentially significant impacts on Black Harrier** (*Circus maurus*, Endangered and endemic). According to Jenkins et al. 2014: "The wetlands of the lower reaches of the Dwarsrivier, just south-west of the study area, as well as the small pans scattered across the open Strandveld of Jakkalsfontein, about 2-3 km to the west, hold several breeding pairs of Black Harrier, and some of African Marsh Harrier *Circus ranivorus* (Curtis et al. 2004, ARJ pers. obs, R. E. Simmons pers. comm.). ... Black Harrier could even breed within the development area in wet years (Curtis et al. 2004)". The assessment fails to refer to relevant information (for example, the attached guidelines for Black Harrier and Wind Energy) and we are concerned that the **risk to the species has**



## Amy Rawlins

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**From:** Amy Rawlins  
**Sent:** Thursday, 04 February 2021 12:40  
**To:** ~~Andrea Gibb <Andrea.Gibb@enertag.co.za>~~  
**Cc:** ~~Amy Rawlins <Amy.Rawlins@erm.com>; Tony Barbour <tony@tonybarbour.co.za>~~  
**Subject:** RE: Rheboksfontein Wind Farm

Good morning Andrea

I have added you to the I&AP register. Please note that we have extended the commenting period until 24 February. You will find the amendment report and appendices here:

<https://www.erm.com/rheboksfontein-eia/>

Please send comments on the report, should you have any to [Engie.Rheboksfontein@erm.com](mailto:Engie.Rheboksfontein@erm.com)

Kind regards

Amy Rawlins  
Consultant

### ERM

1<sup>st</sup> Floor Great Westerford | 240 Main Road Rondebosch | 7700 | Cape Town | South Africa

T +27 21 681 5400 M +27 79 511 4980 (South Africa)

T +254 74 086 1650 M +254 11 455 9992 (Kenya)

E [amy.rawlins@erm.com](mailto:amy.rawlins@erm.com) | W [www.erm.com](http://www.erm.com)



**ERM** *The business of sustainability*

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**From:** ~~Andrea Gibb <Andrea.Gibb@enertag.co.za>~~  
**Sent:** Wednesday, February 3, 2021 5:05 PM  
**To:** ~~liloh@mweb.co.za~~  
**Cc:** Amy Rawlins <Amy.Rawlins@erm.com>; ~~tony <tony@tonybarbour.co.za>~~  
**Subject:** RE: Rheboksfontein Wind Farm

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Hi Amy

Please can you add me to the I&AP database for the Rheboksfontein Wind Farm as a representative from Darling Wind Power (Pty) Ltd.

Kind Regards,  
**Mrs. Andrea Gibb**

Senior Project Developer

~~Tel. +27 21 207 2185 | Mob. +27 78 152 6091 | [Andrea.Gibb@enertrag.co.za](mailto:Andrea.Gibb@enertrag.co.za) | Suite 104, 1<sup>st</sup> Floor | Albion Springs | 163 Main Road | Rondebosch | Cape Town | South Africa~~

~~ENERTRAG South Africa (Pty) Ltd. | Reg no. 2017/143710/07 | 20 Dreyer Street | Claremont | Cape Town | South Africa | 7708 | Dr. Tobias Bischof-Niemz, Stephen Kooopman | [www.enertrag.co.za](http://www.enertrag.co.za)~~

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**From:** ~~mailto: [redacted] <[redacted]>~~  
**Sent:** Wednesday, 03 February 2021 15:12  
**To:** ~~Andrea Gibb <Andrea.Gibb@enertrag.co.za>~~  
**Cc:** ~~Amy Rawlins <Amy.Rawlins@erm.com> ; Tony <tony@tonybarbom.co.za>~~  
**Subject:** Re: Rheboksfontein Wind Farm

Hi Andrea,

Thank you for your e-mail.

The EAP is ERM. Amy Rawlins is the contact person (cc-ed in).

No, we did not address potential wake effects, as not within the scope of the SIA.

Kind regards,  
Schalk

---

**From:** ~~"Andrea Gibb" <Andrea.Gibb@enertrag.co.za>~~  
**To:** ~~mailto: [redacted]~~  
**Sent:** Wednesday, February 3, 2021 10:17:42 AM  
**Subject:** Rheboksfontein Wind Farm

Good day Schalk

We received your contact details from Paul Smit, the owner of the Darling Wind Farm site. As I understand you are undertaking a Social Impact Assessment for the Rheboksfontein Wind Farm.

Could you possibly send me the contact details of the EAP who is undertaking the BA process, as I would like to request that they register Darling Wind Power as an I&AP on the project database. ENERTRAG South Africa acquired Darling Wind Farm in 2018.

In addition, can you confirm if your Social Impact Assessment will be addressing the potential economic impact of the proposed Rheboksfontein Wind Farm on the Darling Wind Farm, in terms of Wake Effects.

Kind Regards,  
**Mrs. Andrea Gibb**  
Senior Project Developer

~~Tel. +27 21 207 2105 | Mob. +27 70 152 6091 | [Andrea.Gibb@enertrag.co.za](mailto:Andrea.Gibb@enertrag.co.za) | Suite 101, 1<sup>ST</sup> Floor | Albion Springs |  
163 Main Road | Rondebosch | Cape Town | South Africa~~

~~ENERTRAG South Africa (Pty) Ltd | Reg no. 2017/143710/07 | 20 Dreyer Street | Claremont | Cape Town | South  
Africa | 7708 | Dr. Tobias Bischof Niemz, Stephen Koopman | [www.enertrag.co.za](http://www.enertrag.co.za)~~

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## Amy Rawlins

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**From:** ~~John Duckitt Gmail <jhn.dcktt@gmail.com>~~  
**Sent:** Friday, 05 February 2021 14:48  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Subject:** Rheboksfontein wind farm

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Hi I would like to continue to be regarded as an Interested and Affected Party

~~Name: John Duckitt~~  
~~Address: Waylands, PO Box 21, Darling 7345~~  
~~Email: [jhn.dcktt@gmail.com](mailto:jhn.dcktt@gmail.com)~~  
~~Cell/home: 0826587667~~  
~~Organisation: Darling Wildflower Society~~

Thanks you

Kind regards

John Duckitt



## Amy Rawlins

---

**From:** ERM South Africa – Engie Rheboksfontein EIA  
**Sent:** Sunday, 14 February 2021 15:42  
**To:** ~~Butch Rice; ERM South Africa – Engie Rheboksfontein EIA~~  
**Subject:** RE: I&AP

Good day Mr Rice  
Thank you for your email. You have been registered as an I&AP.  
Kind regards,  
Amy Rawlins

---

**From:** ~~Butch Rice <mbbutchr@mvweb.co.za>~~  
**Sent:** Saturday, February 13, 2021 6:37 PM  
**To:** ERM South Africa – Engie Rheboksfontein EIA <Engie.Rheboksfontein@erm.com>  
**Subject:** Fwd: I&AP

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See below. Please confirm my registration as an I&AP.

Many thanks,

Butch Rice

Begin forwarded message:

~~**From:** Butch Rice <[mbbutchr@mvweb.co.za](mailto:mbbutchr@mvweb.co.za)>~~  
**Subject:** I&AP  
**Date:** 10 February 2021 at 10:31:07 SAST  
**To:** [Engie.Rheboksfontein@erm.com](mailto:Engie.Rheboksfontein@erm.com)

Please register me.

Full Name : Butch Rice

~~**Email address:** [mbbutchr@mvweb.co.za](mailto:mbbutchr@mvweb.co.za)~~

~~**Mobile number:** 0836318681~~

~~**Address:** 122/123 Plover Cluster, Jakkalsfontein~~

Please confirm all in order.

Thanks.

## Amy Rawlins

---

**From:** ~~Eva Orbis <eva@erasandis.com>~~  
**Sent:** Sunday, 14 February 2021 12:10  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Subject:** I&AP

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Dear Erm,

Further to having registered as an I&AP, in a separate email, I would like to strongly object to the Rheboksfontein Wind Energy Facility, which was opposed by Jakkalsfontein Nature reserve almost 10 years ago. The extension, as part two amendment, I oppose even stronger, in my private capacity.

Eva Gomez Orbis Madsen

~~eva@erasandis.com~~  
~~078 328 0079~~  
~~117 Strohochst~~  
~~Jakkalsfontein Nature Reserve~~  
~~Swardland 7345~~

Kind regards,

~~Eva Orbis~~

Sent from my iPhone

## Amy Rawlins

---

**From:** ~~Eva Orbis - eva@evaorbis.com~~  
**Sent:** Sunday, 14 February 2021 11:55  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Subject:** I&AP

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Dear ERM,

I would herewith like to register in order to object to the development, and subsequently extending to part two amendment of the Moyeng wind farm

~~Eva Orbis - Orbis Medun~~  
~~Eva@evaorbis.com~~  
~~075 378 6079~~  
Private capacity  
~~117 Stonoboch~~  
~~112 Cecil Johnrain Private Nature Reserve~~  
~~Swardland 7345~~

Kind regards,

Eva Orbis  
Sent from my iPhone

## Amy Rawlins

---

**From:** ~~Waseefa Dhansay <Waseefa.Dhansay@westerncape.gov.za>~~  
**Sent:** Tuesday, 16 February 2021 21:59  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Cc:** ~~Stephanie Barnardt~~  
**Subject:** RE: Public Participation Process extension for the Part Two EA Amendment for the Rheboksfontein Wind Energy Facility  
**Attachments:** image005.wmz; image010.wmz

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Dear Amy

As per the advice of the legal advisor below – your heritage consultant will need to submit the HIA and update it accordance to the approval and whether or not the amendments are supported. The report will need to be tabled before the APM and IACom committees which are taking place on 3 and 10 March 2021. Kindly note there is a three week submission deadline which has lapsed however in order to accommodate the project HWC will accept the submission by Monday 22 February 2021. Kindly ensure that the documentation is emailed to Stephanie Barnardt cc'd in this email by said date.

Kind regards,

**Waseefa Dhansay**  
**Assistant Director: Professional Services**  
Heritage Resource Management Services  
Heritage Western Cape



**Email:** [waseefa.dhansay@westerncape.gov.za](mailto:waseefa.dhansay@westerncape.gov.za)  
**Website:** <https://www.hwc.org.za>

**Provincial hotline: 080 928 4102**  
**WhatsApp: "Hi" to 0600 123 456**  
**Email: [doh.dismed@westerncape.gov.za](mailto:doh.dismed@westerncape.gov.za)**  
Operating 24 hours a day  
[coronavirus.westerncape.gov.za](https://coronavirus.westerncape.gov.za)

---

**From:** ERM South Africa – Engie Rheboksfontein EIA <Engie.Rheboksfontein@erm.com>  
**Sent:** Tuesday, February 16, 2021 5:14 PM  
**To:** ~~Waseefa Dhansay <Waseefa.Dhansay@westerncape.gov.za>~~  
**Subject:** RE: Public Participation Process extension for the Part Two EA Amendment for the Rheboksfontein Wind Energy Facility

Good day Waseefa

Please can you confirm that HWC will be sending through a comment before 24 February?

Kind regards  
Amy Rawlins

---

**From:** ~~Penelope E Meyer <Penelope.Meyer@westerncape.gov.za>~~  
**Sent:** Wednesday, February 10, 2021 9:55 AM  
**To:** ~~Waseefa Dhlamini <Waseefa.Dhlamini@westerncape.gov.za>~~; ERM South Africa – Engie Rheboksfontein EIA <Engie.Rheboksfontein@erm.com>; ~~Stephanie Barnardt <Stephanie.Barnardt@westerncape.gov.za>~~  
**Subject:** RE: Public Participation Process extension for the Part Two EA Amendment for the Rheboksfontein Wind Energy Facility

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Hi Waseefa,

As the decision was taken about 9 years ago, we need to approach with caution. I have read the letter from ACO and what concerns me is the assertion that the visual impact will be dealt with in a separate report, but we do not have sight of it. I would lean towards simply submitting the original HIA together with the update relating to the new proposal, and the committees can decide whether or not they feel the deviations are of a substantial nature or not. However I think it should go to both APM and IACom, due to impact on the cultural landscape.

Kind regards,

**Penelope E Meyer**  
**Deputy Director: Heritage Western Cape Legal Support**  
Heritage Resource Management Services  
Heritage Western Cape

3<sup>rd</sup> Floor, Protea Assurance Building  
Green Market Square  
Cape Town  
8001

**Email:** [Penelope.Meyer@westerncape.gov.za](mailto:Penelope.Meyer@westerncape.gov.za)  
**Website:** <https://www.hwc.org.za>



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Operating 24 hours a day  
[coronavlrus.westerncape.gov.za](https://coronavlrus.westerncape.gov.za)

---

**From:** ~~Waseefa Dhansay <Waseefa.Dhansay@westerncape.gov.za>~~  
**Sent:** Wednesday, February 10, 2021 6:04 AM  
**To:** ~~Penelope F Meyer <Penelope.Meyer@westerncape.gov.za>~~; ERM South Africa – Engie Rheboksfontein EIA <Engie.Rheboksfontein@erm.com>; ~~Stephanie Barnard <Stephanie.Barnard@westerncape.gov.za>~~  
**Subject:** FW: Public Participation Process extension for the Part Two EA Amendment for the Rheboksfontein Wind Energy Facility

Hi Penny

Can you please advise on the communication below – there has been amendments to the approved submission .

I have indicated that as there has been amended a new NID is required as the previous S38 process with HWC has concluded.

Can they submit a revised report with the deviations for consideration or would a new NID be required? If the above can be done we can table the submission at APM.

Kind regards,

**Waseefa Dhansay**  
**Assistant Director: Professional Services**  
Heritage Resource Management Services  
Heritage Western Cape



**Email:** [waseefa.dhansay@westerncape.gov.za](mailto:waseefa.dhansay@westerncape.gov.za)  
**Website:** <https://www.hwc.org.za>

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[coronavirus.westerncape.gov.za](https://coronavirus.westerncape.gov.za)

---

**From:** ERM South Africa – Engie Rheboksfontein EIA <>  
**Sent:** Tuesday, February 9, 2021 11:14 AM  
**To:** ~~Waseefa Dhansay <Waseefa.Dhansay@westerncape.gov.za>~~; ERM South Africa – Engie Rheboksfontein EIA <Engie.Rheboksfontein@erm.com>  
**Subject:** RE: Public Participation Process extension for the Part Two EA Amendment for the Rheboksfontein Wind Energy Facility

Hi Waseefa

Please can you confirm what the 'formal submission' is. We have never needed to submit a NID for an amendment before, can you please confirm that a NID is not necessary?

The department has been notified of the availability of the report. Please can you confirm that you have access to this report.

Kind regards,  
Amy

---

**From:** ~~Waseefa Dhansay <Waseefa.Dhansay@westerncape.gov.za>~~  
**Sent:** Monday, February 8, 2021 8:34 PM  
**To:** ERM South Africa – Engie Rheboksfontein EIA <[Engie.Rheboksfontein@erm.com](mailto:Engie.Rheboksfontein@erm.com)>  
**Subject:** RE: Public Participation Process extension for the Part Two EA Amendment for the Rheboksfontein Wind Energy Facility

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Dear Amy

The Letter form ACO is noted however that does not constitute an endorsement by HWC on the amendments. A formal submission needs to be submitted and HWC will formally respond accordingly.

Kind regards,

**Waseefa Dhansay**  
**Assistant Director: Professional Services**  
Heritage Resource Management Services  
Heritage Western Cape



**Email:** [waseefa.dhansay@westerncape.gov.za](mailto:waseefa.dhansay@westerncape.gov.za)  
**Website:** <https://www.hwc.org.za>

---

**From:** ERM South Africa – Engie Rheboksfontein EIA <[Engie.Rheboksfontein@erm.com](mailto:Engie.Rheboksfontein@erm.com)>  
**Sent:** Monday, February 8, 2021 10:41 AM  
**To:** ~~Waseefa Dhansay <Waseefa.Dhansay@westerncape.gov.za>~~  
**Subject:** RE: Public Participation Process extension for the Part Two EA Amendment for the Rheboksfontein Wind Energy Facility

Good morning Waseefa

A NID has not been submitted as part of this process owing to the fact that this is an amendment process of an already authorised development and Section 38 process was concluded during the EIA process and the HIA approved. The Heritage Impact Assessment has been updated (Please see attached) and has concluded that no additional impacts would be created by the proposed changes to the project.



Kind regards,  
Amy Rawlins

---

**From:** ~~Waseefa Dhansay <waseefa.dhansay@westerncape.gov.za>~~

**Sent:** Thursday, February 4, 2021 5:47 PM

**To:** ERM South Africa – Engie Rheboksfontein EIA <[Engie.Rheboksfontein@erm.com](mailto:Engie.Rheboksfontein@erm.com)>

**Subject:** RE: Public Participation Process extension for the Part Two EA Amendment for the Rheboksfontein Wind Energy Facility

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good day

Can you confirm if a Section 38 NID was submitted to HWC in order to comment?

Kind regards,

**Waseefa Dhansay**  
**Assistant Director: Professional Services**  
Heritage Resource Management Services  
Heritage Western Cape

**Email:** [waseefa.dhansay@westerncape.gov.za](mailto:waseefa.dhansay@westerncape.gov.za)

**Website:** <https://www.hwc.org.za>



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Operating 24 hours a day  
[coronavirrus.westerncape.gov.za](http://coronavirrus.westerncape.gov.za)

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**From:** ERM South Africa – Engie Rheboksfontein EIA <[Engie.Rheboksfontein@erm.com](mailto:Engie.Rheboksfontein@erm.com)>

**Sent:** Thursday, February 4, 2021 4:18 PM

**To:** ERM South Africa – Engie Rheboksfontein EIA <[Engie.Rheboksfontein@erm.com](mailto:Engie.Rheboksfontein@erm.com)>

**Subject:** Public Participation Process extension for the Part Two EA Amendment for the Rheboksfontein Wind Energy Facility

Good day all

Please note that the commenting period for the above-mentioned project has been extended until 24 February 2021 to allow stakeholders more time to submit comments.

The Draft Amendment Report is available at:

- Darling Public Library
- Swartland Municipal Office (Tourism Bureau), 46 Main Road, Yzerfontein
- ERM Website: <https://www.erm.com/rheboksfontein-eia/>



You are invited to submit your comments and/or queries on the report to ERM.

Amy Rawlins  
Consultant

**ERM**

1<sup>st</sup> Floor Great Westerford | 240 Main Road Rondebosch | 7700 | Cape Town | South Africa

W [www.erm.com](http://www.erm.com)



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**Our Ref:** HM/WEST COAST/ SWARTLAND / MALMESBURY /  
RHEBOKSFONTEIN WIND ENERGY FACILITY  
**Case No.:** 15031602GT0317E  
**Enquiries:** Stephanie-Anne Barnardt  
**E-mail:** stephanie.barnardt@westerncape.gov.za



John Gribble  
8 Jacobs Ladder St James, 7945  
john.gribble@aco-associates.com

**FINAL COMMENT**  
**In terms of Section 38(1) of the National Heritage Resources Act (Act 25 of 1999) and the Western Cape Provincial Gazette 6061, Notice 298 of 2003**

**HERITAGE IMPACT ASSESSMENT: PART TWO EA AMENDMENT FOR THE RHEBOKSFONTEIN WIND ENERGY FACILITY, MALMESBURY MAGISTERIAL DISTRICT, SUBMITTED IN TERMS OF SECTION 38(8) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)**

**CASE NUMBER: 15031602GT0317E**

The matter above has reference.  
This matter was discussed at the Impact Assessment Committee (IACom) meeting held on 10 March 2021.

It was noted that the matter was tabled at Archaeology, Palaeontology and Meteorites Committee (APM) meeting held on the 3 March 2021 whereby the Committee endorsed the Heritage Specialist Impact Statement by ACO Associates, dated 16 November 2020, for the Rheboksfontein WEF Part Two EA Amendment Application.

**FINAL COMMENTS:**

The Committee endorsed the documents tabled and the letter dated 16 November 2020 prepared by ACO Associates and supported the amended proposal.

HWC reserves the right to request additional information as required.  
Should you have any further queries, please contact the official above and quote the case number.

.....  
Colette M Scheermeyer  
**Acting Chief Executive Officer**



[www.westerncape.gov.za/cas](http://www.westerncape.gov.za/cas)

**Street Address:** Protea Assurance Building, Green Market Square, Cape Town, 8000 • **Postal Address:** P.O. Box 1665, Cape Town, 8000  
• **Tel:** +27 (0)21 483 5959 • **E-mail:** ceoheritage@westerncape.gov.za

**Straatadres:** Protea Assuransie-gebou, Groentemarkplein, Kaapstad, 8000 • **Posadres:** Posbus 1665, Kaapstad, 8000  
• **Tel:** +27 (0)21 483 5959 • **E-pos:** ceoheritage@westerncape.gov.za

**Idilesi yendawo:** kumgangatho 3, kwisakhiwo iProtea Assurance, Greenmarket Square, eKapa, 8000 • **Idilesi yeposi:** Inombolo yebhokisi yeposi 1665, eKapa, 8000 • **Iinombolo zomnxeba:** +27 (0)21 483 5959 • **Idilesi ye-imeyile:** ceoheritage@westerncape.gov.za

## Amy Rawlins

---

**From:** ~~David Wilcock~~  
**Sent:** Tuesday, 16 February 2021 15:04  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Subject:** Rheboksfontein Wind Farm Project

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Sirs

I wish to register as an I&AP for the Rheboksfontein wind farm project.

I am a property owner at Jakkalsfontein, a private nature reserve located almost directly opposite the proposed site of the wind farm location. I would like to object, in the strongest terms, to the extension of the EA, as well as the increased size of the proposed turbines.

Jakkalsfontein is a 4000 acre reserve which is managed according to the strictest environmental protocols. To have a wind energy facility 300 metres from our front boundary flies in the face of all conservation aims and objectives, destroys the atmosphere of a nature reserve through its ill-favoured visual impact, and, more importantly, would be a direct threat to several red-listed species of birds that traverse, breed and/or inhabit the reserve.

I notice from the recent EA submission that the number of proposed turbines has been reduced from 35 to 33 presumably in an attempt to mitigate avian fatalities? but I am not convinced that this will sufficiently reduce the prospective carnage that is known to be caused by such on-shore installations around the world. As you are doubtless aware, best practice actively discourages the erection of wind turbines on ridge lines in areas of raptor activity, due to the high mortality rate.

Please register me as an objector to the proposed extension of authorisation and it's various conditions.

I would appreciate confirmation of receipt of this email.

Yours faithfully,

~~David Wilcock~~  
~~51 Sandpiper~~  
~~Jakkalsfontein~~

## Amy Rawlins

---

**From:** ~~Butch Rice - amy@butchrice.com~~  
**Sent:** Tuesday, 16 February 2021 10:36  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Subject:** Rheboksfontein

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Amy,

Thank you for confirming my registration as an I&AP for the Rheboksfontein project. I would like to object, in the strongest terms, to the extension of the EA, as well as the increase in the height of the turbines by 32 metres.

I am a resident of Jakkalsfontein, a private nature reserve of some 4000 acres. Cape Nature is the ultimate custodian of the reserve, which is managed according to the strictest environmental protocols, regarding both flora and fauna. To have a wind energy facility 300 metres from our boundary would fly in the face of any conservation ethic.

I refer to the radar tracking study by A.Jenkins et al ( 2014 ) included in your documents, in which he says “ The proposed wind farm remains directly in the main fly-way used by pelicans as they commute to and from Dassen Island. Given this, and given the strong possibility that the facility will impact negatively on local populations of other red-listed species, careful consideration should be given to abandoning this project “. I agree completely.

I recognise that the number of turbines has been reduced from 35 to 33 in order to attempt to mitigate the avian fatalities, but am unconvinced that this will suffice. Since the time of the original EA, we have learnt that the Great White Pelican population on Dassen Island, previously thought stable, is already in decline. This WEF will hasten their demise.

Other species at risk include the Black Harrier, of which there are less than 1000 left on the planet. Jakkalsfontein is a breeding site for these migrants, making them particularly vulnerable.

I am sure that you are aware that best practice globally discourages the erection of wind turbines on ridge lines in areas of raptor activity, due to the high mortality rate. It should also be discouraged here.

In summary, I am opposed to an extension of the EA, as well as the approval of an increase in wind turbine height, due to the extremely close proximity of the development to the Jakkalsfontein private nature reserve, as well as the threat it poses to local red-listed bird species, particularly the Great White Pelicans. Many years ago, I bought my house in Jakkalsfontein precisely because it is a nature reserve, with no possibility of an increased density of housing, and a sense of peace and tranquility that pervades the reserve. To have enormous wind turbines with winking red lights at night on our eastern border would completely destroy the atmosphere of a nature reserve and all it stands for, as the visual impact would be disastrous.

I would appreciate confirmation of receipt of this mail, and registration as an objection to the proposal of extension of authorisation, as well as the proposed increase in the height of the wind turbines.

Yours faithfully,

Butch Rice

~~122/123 Plover~~

~~Jakkalsfontein~~

~~0250512081~~

## Amy Rawlins

---

**From:** ~~XXXXXXXXXXXXXXXXXXXX@XXXXXX~~  
**Sent:** Tuesday, 16 February 2021 18:06  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Subject:** Registration as I&AP in the Rheboksfontein project

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Ms Rawlins

My name is Peter Gibbs.

I am a trustee of the Gibbs Family Trust ,which owns a house at Jakkalsfontein Nature Reserve.

I would like to object to the Rheboksfontein project and would appreciate it if you can confirm whether I must be registered as an interested and affected party before I object.

If so, please register my Trust as an I&AP and confirm such registration ,so I can then object.

I look forward to your confirmation soonest as I understand from the JHA board that the period for objections close fairly shortly.

Many thanks

Regards  
Peter Gibbs

## Amy Rawlins

---

**From:** ~~Wally Feldon <w.feldon@gmail.com>~~  
**Sent:** Tuesday, 16 February 2021 13:03  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Subject:** I&AP registration

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Hello  
Kindly register me as an I&AB objector asap.  
Many thanks

~~Walter Feldon~~  
~~48 Warbler Cluster~~  
~~Jakkalsfontein Nature Reserve~~  
~~tel: 022 937 6020~~

Sent from my iPhone

## Amy Rawlins

---

**From:** ~~David & Sue <davesue@nwelb.co.za>~~  
**Sent:** Wednesday, 17 February 2021 12:33  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Subject:** Rebokfontein Wind energy

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Dear "Engie"  
Could you please register me as an InAP for this project.

Regards,  
David Whitelaw  
Chairman: Cape Bird Club  
Conservation Committee.



## Amy Rawlins

---

**From:** ~~wally.feldon@feldon.com~~  
**Sent:** Thursday, 18 February 2021 11:07  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Subject:** Re: I&AP registration

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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To whom it may concern

As a property owner at Jakkalsfontein Nature reserve I wish to register my objection to the proposed wind farm RHEBOKSFONTEIN.

Jakkalsfontein forms part of the Biosphere that extends from Koeburg Power Station to the West Coast Nature Reserve and distance of almost 100 km of coastal fynbos and natural sanctuary for bird and animal life unique to this part of the world and with some totally unique species.

There are many alternative locations for the installation of wind farms that have far less potential for negative impact on a sensitive environment such as this.

The fact that various minor changes have been introduced into the proposed project such as number of towers and overall height modifications does not alter the fact that this proposed location will impact negatively on this sensitive environment, to the detriment of everyone.

I repeat again that this is a unique area and the Biosphere plan laid out by Cape Nature surely does not envisage an installation such as this, with its limited contribution to the national good at the cost of its long negative effect.

Sincerely

~~Walter Feldon~~  
~~48 Warbler Cluster~~  
~~Jakkalsfontein Nature Reserve.~~  
~~R27 West Coast~~

> On 16 Feb 2021, at 17:10, ERM South Africa – Engie Rheboksfontein EIA <Engie.Rheboksfontein@erm.com> wrote:

>

> Good day Mr Feldon

> Thank you for your mail, you have been registered as an I&AP.

> Kind Regards,

> Amy Rawlins

>

> -----Original Message-----

> ~~From: Wally Feldon <feldonw@gmail.com>~~

> Sent: Tuesday, February 16, 2021 1:03 PM

> To: ERM South Africa – Engie Rheboksfontein EIA <Engie.Rheboksfontein@erm.com>

> Subject: I&AP registration

>

> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

>

>

> Hello

> Kindly register me as an I&AB objector asap.

> Many thanks

>

> ~~Walter Folden~~

> ~~48 Warbler Cluster~~

> ~~Jakkalsfontein Nature Reserve~~

> ~~Mobile: 0233760880~~

>

> Sent from my iPhone

## Amy Rawlins

---

**From:** ~~janpienaar@web.co.za~~  
**Sent:** Thursday, 18 February 2021 09:47  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Cc:** ~~janpienaar@web.co.za~~  
**Subject:** Registration as an I&AP for the Rheboksfontein project

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Amy, can you please register me as an I&AP for the Rheboksfontein project. I am an owner/resident at Jakkalsfontein Nature Reserve.

Regards

Jan

## Amy Rawlins

---

**From:** ~~jbc@ams-jbc@ams@telkom.net~~  
**Sent:** Thursday, 18 February 2021 07:16  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Subject:** great white pelicans

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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I would like to register as a Interested and Affected Party to object to the increasing of the height of the turbines

on Darling Hills as it would affect red-list bird species also other bird species eg. Buzzards and Black Harriers

## Amy Rawlins

---

**From:** ~~amy.rawlins@ermsa.co.za~~  
**Sent:** Thursday, 18 February 2021 16:40  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Subject:** Re: Registration as I&AP

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Amy,

Thank you for confirming my registration as an I&AP for the Rheboksfontein project. I would like to object, in the strongest terms, to the extension of the EA, as well as the increase in the height of the turbines by 32 metres.

I am a resident of Jakkalsfontein, a private nature reserve of some 4000 acres. Cape Nature is the ultimate custodian of the reserve, which is managed according to the strictest environmental protocols, regarding both flora and fauna. To have a wind energy facility 300 metres from our boundary would fly in the face of any conservation ethic.

I refer to the radar tracking study by A.Jenkins et al ( 2014 ) included in your documents, in which he says “ The proposed wind farm remains directly in the main fly-way used by pelicans as they commute to and from Dassen Island. Given this, and given the strong possibility that the facility will impact negatively on local populations of other red-listed species, careful consideration should be given to abandoning this project “. I agree completely.

I recognise that the number of turbines has been reduced from 35 to 33 in order to attempt to mitigate the avian fatalities, but am unconvinced that this will suffice. Since the time of the original EA, we have learnt that the Great White Pelican population on Dassen Island, previously thought stable, is already in decline. This WEF will hasten their demise.

Other species at risk include the Black Harrier, of which there are less than 1000 left on the planet. Jakkalsfontein is a breeding site for these migrants, making them particularly vulnerable.

I am sure that you are aware that best practice globally discourages the erection of wind turbines on ridge lines in areas of raptor activity, due to the high mortality rate. It should also be discouraged here.

In summary, I am opposed to an extension of the EA, as well as the approval of an increase in wind turbine height, due to the extremely close proximity of the development to the Jakkalsfontein private nature reserve, as well as the threat it poses to local red-listed bird species, particularly the Great White Pelicans. Many years ago, I bought my house in Jakkalsfontein precisely because it is a nature reserve, with no possibility of an increased density of housing, and a sense of peace and tranquility that pervades the reserve. To have enormous wind turbines with winking red lights at night on our eastern border would completely destroy the atmosphere of a

nature reserve and all it stands for, as the visual impact would be disastrous.

I would appreciate confirmation of receipt of this mail, and registration as an objection to the proposal of extension of authorisation, as well as the proposed increase in the height of the wind turbines.

Regards  
Carrots Doyle

**From:** ERM South Africa – Engie Rheboksfontein EIA  
**Sent:** Thursday, February 18, 2021 10:09 AM  
**To:** carrots  
**Subject:** RE: Registration as I&AP

Good morning  
Thank you for your email. You have been added to the I&AP database.  
Kind regards,  
Amy Rawlins

---

**From:** ~~carrots@fast.co.za~~  
**Sent:** Thursday, February 18, 2021 9:43 AM  
**To:** ERM South Africa – Engie Rheboksfontein EIA <Engie.Rheboksfontein@erm.com>  
**Subject:** Registration as I&AP

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**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Amy,

Please register me as an I&AP for the Rheboksfontein project. Use my email address as above.

Please confirm all is in order.

Many thanks,

Carrots Doyle,  
~~94 Cormorant,~~  
~~Jakkalsfontein~~  
~~0833650750~~

## Amy Rawlins

---

**From:** ~~Arthur James Southonjames321@gmail.com~~  
**Sent:** Friday, 19 February 2021 18:40  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Subject:** Rheboksfontein Porposed Wind Farm

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Dear Sirs

I am a homeowner resident at Jakkalsfontein, close to the proposed windfarm development.  
May I ask that you please register my interest and keep me copied on all public communications concerning this development.

Kind Regards

## Amy Rawlins

---

**From:** ~~David & Maria Kudu - johzoleodget@gmail.com~~  
**Sent:** Monday, 22 February 2021 22:12  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Subject:** Wind Turbines

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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Good day

I wish to register as an I&AP  
I should be grateful if you would include me in all correspondence.

Kind regards



## Amy Rawlins

---

**From:** ~~Admin <admin@ilkf.co.za>~~  
**Sent:** Monday, 22 February 2021 17:51  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Cc:** ~~Johann Louw, Steyn Marais~~  
**Subject:** PART TWO ENVIRONMENTAL AUTHORIZATION AMENDMENT FOR THE RHEBOKSFONTEIN WIND ENERGY FACILITY IN WESTERN CAPE, SOUTH AFRICA  
**Attachments:** image001.png; Rheboksfontein WEF Objection JHA.zip  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed  
**Expires:** Saturday, 21 August 2021 01:00

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### JAKKALSFONTEIN



### NATURE RESERVE

~~PRIVATE BAG X2 - DARLING - SOUTH AFRICA - 7345 - WEST COAST ROAD (R27) •  
TEL: +27 22 408 2011 FAX: +27 22 408 2313  
email: [admin@ilkf.co.za](mailto:admin@ilkf.co.za)~~

ERM  
1<sup>ST</sup> Floor  
Great Westerford  
240 Main Road,  
Rondebosch  
7700

22 February 2021

ERM Ref: 0554699  
DEA Reference: 12/12/20/1582

ERM Team,

**PART TWO ENVIRONMENTAL AUTHORISATION AMENDMENT FOR THE RHEBOKSFONTEIN WIND ENERGY FACILITY IN  
WESTERN CAPE, SOUTH AFRICA**

Your letter dated 4 February 2021 under above heading refers.

**The Jakkalsfontein Homeowners Association, does not support- and strongly objects to the proposed amendment of the Project description for the following reason.**

Throughout the earlier Environmental Impact Assessment process, the Jakkalsfontein Homeowners Association opposed the planned location of this facility, primarily based on the negative visual and ecological impact arising from its location amidst an area characterised by zoned nature conservation land use / nature reserves associated with unique biodiversity.

The Jakkalsfontein Homeowners Association who represents 107 property owners and owns the Jakkalsfontein Nature Reserve, situated less than 3 km from the planned Rheboksfontein Wind Energy Facility, is still firmly maintaining our earlier position in this regard. For your reference, find our objection to the latest environmental amendment, including comments, objections and appeals submitted as part of the earlier EIA process attached:

*Document 1: 22 February 2021 – Objection to the Part Two Environmental Authorisation Amendment for the Rheboksfontein Wind Energy Facility*

*Document 2: 27 July 2011 – Comment on the final Environmental Impact Assessment Report for the construction of the Rheboksfontein Windfarm project*

*Document 3: 22 March 2012 – Appeal to the then Department Environmental Affairs and Tourism (DEAT)*

*Document 4: June 2014 – 3D Simulation supplied by Jakkalsfontein Homeowners Association to the environmental consultant*

Kindly provide us with proof that this letter, with the four attachments included, was received by:

- 1) Your office; and
- 2) the reviewing officer of the National Department Environment, Forestry and Fisheries.

Yours sincerely,

Johann Louw  
Board Chairman: Jakkalsfontein Homeowners Association

**Jakkalsfontein Homeowners Association NPC (RF)  
REGISTRATION No 1992/007369/08**

# JAKKALSFONTEIN



NATURE RESERVE

~~PRIVATE BAG X2, DARLING, SOUTH AFRICA, 7345, WEST COAST ROAD (R27)~~  
~~TEL: 07 22 409 2344 FAX: 07 22 409 2343~~  
~~email: admin@jkkf.co.za~~

Environmental Resources Management Southern Africa  
240 Main Road  
Rondebosch 7700

22 February 2021

Rheboksfontein Wind Energy Facility: ERM Ref: 0554699; DEA Reference: 12/12/20/1582

The Board of the Jakkalsfontein Homeowners Association (JHA) wish to register its objection to the *Part Two Environmental Authorisation Amendment for the Rheboksfontein Wind Energy Facility in Western Cape, South Africa* ("The Report"), issued by Environmental Resources Management Southern Africa and dated 9 December 2020. We summarise our thoughts under seven headings.

## 1. The process

The Board of the JHA received notice of the extension of the comment period on 4 February 2021. We never received the original request for comments, dated 10 December 2020. Although we accept that there were other notifications in the press and elsewhere, other Interested and Affected Parties (I&APs) were contacted by telephone to solicit their views, as contained in the Report.

Jakkalsfontein is the only officially recognised private nature reserve registered as an I&AP listed in the Report, and we are surprised that not even minimal efforts were made to elicit our views. Our nature reserve is, according to the Report (Table 1.1), 300 metres from the boundary of the project area, which makes it even more important for us to receive timeous notifications on this matter.

As a result, we were unable to prepare a substantive response to the Report.

It should be noted furthermore that even if every I&AP received notice on 10 December 2020, it would still have left them six weeks (now 10 weeks) to prepare their responses. The project developer, in contrast, had literally years to prepare the amended proposal.

Although this might meet the legal definition of “public participation”, our view remains that this process tilts the scales dramatically in favour of the developer. “Asking for comments” is a much more accurate description of what we are being to contribute, rather than a much more meaningful “public participation” in decisions that affect us directly.

## 2. Visual impact

Our original objection and appeal (which we append to this letter for easy reference) expressed grave concern about the visual impact of the development. We asked for a three-dimensional view of what the turbines would look like from Jakkalsfontein’s perspective, and in the absence of such an image, we supplied our own. The current specialist report also does not include such a depiction - the maps contained in the report do not give a good indication of what the visual impact would be, and we again ask that the Report includes such a three-dimensional representation. Without it, we simply do not know what we are being asked to approve, in terms of visual impact on the nature reserve.

The Report indicates (p. 50) that the amended proposal “would slightly increase the visibility of the project and its exposure”. The significance of the impact remains “moderate to high”. We therefore can only repeat our objection to this aspect of the proposed turbines.

## 3. Impact on flora

The Dwars River is an important riparian area in the Jakkalsfontein ecosystem. It flows to Jakkalsfontein directly from the project area (Figures 4-13 and 4-14). These figures also identify the general area as of “medium habitat sensitivity”. The Jakkalsfontein Nature Reserve initiated the “Dwars River Project” many years ago to clear the river and its banks from alien vegetation to create a healthier ecosystem on the Reserve.

There is nothing in the Report addressing areas such as these, which flows from and through the project area to the sea.

We ask that the report address the impact of the project on the ecology of the Dwars River directly, including proposals to mitigate possible negative impacts. We furthermore recommend that the developer consider, should the project continue, the ecological benefit of linking the Renosterveld remnants of the upper reaches of the Dwars River North by active restoration of riparian and Renosterveld vegetation along the river course to the point where it enters Jakkalsfontein Nature Reserve.

## 4. Avian impact assessment

The Report observes that the great white pelican population on Dassen Island is declining but is rather sanguine about the potential contribution of the project to the decline. We do not share that view, and the fact that the Report recommends careful monitoring of this aspect of the project, reinforces our continuing concern, expressed

ten years ago as well. One wonders also how realistic the proposed mitigating factors would be.

## 5. Social impact assessment

The specialist report is replete with terms like “potential impacts”, “likely to” (increase employment opportunities), “has the potential to create”, etc. (p. vii). We acknowledge that it is difficult to predict social impacts of any project, but such a lack of specifics does not inspire confidence.

“Community trusts” are identified as one way of increasing the social impact of the project. But here too this is mostly an aspirational statement, with no concrete measures identified. For a start, is such a community trust proposed in the plan? (It is not clear from the Report whether this is indeed the intention). If so, a sceptical reader would want to see, for example, a timetable of implementation, details of its membership, reporting requirements to “the community”, etc.

The “sense of place” that the Report includes in its consideration of social impact (section 4.4.5 of the specialist report) does not acknowledge the unique character of a nature reserve, partly because we did not participate in the “comments”. The views of the landowners quoted in the Report generally reflect a “no objection” stance. Given the nature of their land use, and positioning in terms of the project, this is understandable. However, the views of homeowners in a proclaimed nature reserve deserve at least the same respect, if not more. After all, this is a consideration in terms of the *environmental* impact, under the appropriate Act, of a proposed development.

The relative neglect of nature conservation in the Report is further reflected in section 8.6.4, *Impacts on the Cultural Landscape and Sense of Place Impact Description*: “The region’s landscape is strongly dominated by agriculture - wheat farming and grazing – and modifications to the landscape almost exclusively revolve around agriculture and farm complexes”. This may be true of the whole Swartland district, but in the immediate environment surrounding the project site nature reserves form approximately 33% of the area. The Report thus again underplays the nature conservation elements of the project.

In addition, the JHA originally objected to the proposal also on the threat to property values it presented. The literature review conducted by the researchers (section 4.4.6 of their report) does not exactly put one’s mind at rest. The most it is prepared to say, based on the research into this aspect, is that limited sales data are available on value impacts of this type of development on lifestyle properties (p. 104).

## 6. Monitoring and reporting on the project

The Report commits the project to “operational monitoring and adaptive management”. We agree with such an approach to the implementation of any project, and we note with approval the appointment of an environmental control officer. We regard it as appropriate that interim quarterly reports will be produced, together with annual reports.

We request that the reports include specific sections on how the numerous mitigating factors have been implemented in the projects. These are of central concern to the I&As since the developer must commit to these mitigating factors as preconditions for approval of the project. Only reporting on the operations of the project would not address adequately our interest in whether mitigating factors are implemented vigorously.

All these reports should be made available to all registered I&As, either via email or posting them on a website.

## 7. Peer review

It is a widely accepted practice in science and evidence-based policy that reports such as the ones submitted by the specialist researchers are submitted to peer review. The Department of Planning, Monitoring and Evaluation in the State President's Office, for example, conducts peer reviews of all evaluation reports submitted to it. We request that all specialists' reports are submitted for blinded peer review and that these reviews be made available to the I&As.

This is not an accusation of bias or of lack of independence on behalf of the specialists. If non-experts are asked to judge the methods, results, and recommendations of experts in any field, they do not have the knowledge to make an informed judgement about the claims made. They must rely on other experts, the peers of the authors. This is what we are asking for here.

If one looks at the reference lists in the specialists' reports, the datedness of the literature consulted is striking. In the Avifauna report there are very few references after 2017, when compared to those before 2017. In the Noise Impact study, there are no studies published after 2014 that are referenced, and in the Social Impact study there are two references from 2016, the rest are all from before 2016. Without knowledge of developments in the field, the reader has almost no way to judge whether this distracts from the findings and recommendations, and if so, to what extent.

We trust that the above will receive your serious attention.

Yours sincerely,



Johann Louw

Chair: Board of the Jakkalsfontein Homeowners Association

## Amy Rawlins

---

**From:** ~~Karel Marais <kmarais@gmail.com>~~  
**Sent:** Monday, 22 February 2021 14:29  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Subject:** I&AP of Rheboksfontein.

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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Hi,  
I would like to register as an I&AP as an owner of property in Yzerfontein and lodge my opposition to the project.  
Thanks you  
Karel Marais



## Amy Rawlins

---

**From:** ~~Ray van der Merwe <ray@cliffrock.co.za>~~  
**Sent:** Monday, 22 February 2021 18:55  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Subject:** Registration of Interested and Affected Parties (I&APs) - Part Two Environmental Authorisation Amendment for the Rheboksfontein Wind Energy Facility in Western Cape, South Africa

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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Dear ERM

We hereby wish to register as an interested party to the above-mentioned project.

Firm Name: Cliffrock Property Group  
Industry: Real Estate Services & Property Development

Reason: We are currently marketing the neighbouring farm and require further information as part of our EAAB Disclosure to prospective purchasers.

Thank you.

~~Ray van der Merwe  
Managing Director  
Cliffrock Property Group  
V & A Waterfront, Cape Town, South Africa  
ray@cliffrock.co.za  
+2702 779 0110~~



## Amy Rawlins

---

**From:** ~~Thys Pretorius - ampraw@gmail.com~~  
**Sent:** Tuesday, 23 February 2021 13:56  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Subject:** Registration I&AP: Rheboksfontein Wind Energy Facility (DEA Reference: 12/12/20/1582)

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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To whom it may concern.

I Mathys Andries Pretorius herewith request to be registered as an I&AP on the Rheboksfontein Wind Energy Facility (DEA Reference: 12/12/20/1582).

I also place on record that the advertisement of "The Draft Amendment Report" and its availability for comment from 10 December 2020 to 30 January 2021 (i.e. a 30-day comment period) is highly inadequate and is not following due process. The timing over the holiday period with limited exposure is a deliberate attempt to circumvent the public participation process.

The Yzerfontein community as a highly impacted stakeholder is specifically excluded by the limited availability at the following public locations:

1. Darling Public Library
2. Swartland Municipal Office, 46 Main Road, Yzerfontein
3. ERM Website: [www.erm.com/rheboksfontein-eia](http://www.erm.com/rheboksfontein-eia)

The visual impact and the impact on the birdlife with the migratory path from Dassen Island is in particular being negated in this inadequate public participation process.

Regards.

Thys Pretorius

~~Email: [map\\_caw@gmail.com](mailto:map_caw@gmail.com)~~

~~Cell: 27 79 7464 393~~

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## Amy Rawlins

---

**From:** ~~Lizanne Hetherington - lizanneh@ymail.com~~  
**Sent:** Tuesday, 23 February 2021 08:57  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Subject:** Registration as I&AP for Rheboksfontein Wind Energy Facility

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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Hi,

Please register me as an I&AP for the Rheboksfontein Wind Energy Facility as described in <https://www.erm.com/rheboksfontein-eia>

Thanks,  
Lizanne Hetherington  
Yzerfontein Resident

## Amy Rawlins

---

**From:** ~~Evi Elsner <evielnsner@gmail.com>~~  
**Sent:** Tuesday, 23 February 2021 12:03  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Subject:** Re: Wind turbines in Yzerfontein

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Good morning,

I am not against wind turbines in general, if all environmental impacts are considered. There is new technology available, which is much better in protecting bird and wild life.

Newest technology should be considered when spending huge amounts of money.

We need to find ways to cover our energy demand AND have the smallest environmental impact.

Kind regards  
Evi Elsner

On Tue 23. Feb 2021 at 10:31 ERM South Africa – Engie Rheboksfontein EIA  
<[Engie.Rheboksfontein@erm.com](mailto:Engie.Rheboksfontein@erm.com)> wrote:

Good morning

You may simply respond to this email with your comments.

Kind regards,

Amy Rawlins

---

**From:** ~~Evi Elsner <evielnsner@gmail.com>~~  
**Sent:** Monday, February 22, 2021 3:07 PM  
**To:** ERM South Africa – Engie Rheboksfontein EIA <[Engie.Rheboksfontein@erm.com](mailto:Engie.Rheboksfontein@erm.com)>  
**Subject:** Wind turbines in Yzerfontein

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Hello,

Please tell me how to have a say about proposed wind turbines close to Yzerfontein. Thank you.

Kind regards

Evi Elsner

--

Home Concept Solutions CC

~~EVIL & JOCHEM ELSNER~~

~~16 FYNBOS CRESCENT~~

~~PT BOX 08 15~~

~~7351 YZERFONTEIN~~

~~CELL Evi: +27 - 84 - 666 888 1~~

~~CELL Jochem: +27 - 82 - 628 361 8~~

~~E-MAIL: [info@homeconcept.co](mailto:info@homeconcept.co)~~

--

Home Concept Solutions CC

~~EVIL & JOCHEM ELSNER~~

~~16 FYNBOS CRESCENT~~

~~PT BOX 08 15~~

~~7351 YZERFONTEIN~~

~~CELL Evi: +27 - 84 - 666 888 1~~

~~CELL Jochem: +27 - 82 - 628 361 8~~

~~E-MAIL: [info@homeconcept.co](mailto:info@homeconcept.co)~~

## Amy Rawlins

---

**From:** ~~Amy Rawlins <amy.rawlins@ermsa.co.za>~~  
**Sent:** Wednesday, 24 February 2021 15:56  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Subject:** Re: Rheboksfontein Proposed Wind Farm

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Amy

Thank you for confirming my registration as an I&AP for the Rheboksfontein project.

Please note my objection to the extension of the EA, as well as the increase in the height of the turbines.

I am a resident of Jakkalsfontein, a private nature reserve of some 2000 acres on the coast and below the ridge where the windfarm will be built.. Cape Nature is the ultimate custodian of the reserve which is managed according to the strictest environmental protocols regarding both flora and fauna. Adjacent to the Jakkalsfontein Nature Reserve are Tygerfontein and Ronderberg, nature reserves ultimately comprising over 4000 ha of nature reserve. These nature reserves together with Jakkalsfontein are in the immediate vicinity of the proposed wind farm and will be directly affected.

I note from the 2019 External Environmental Compliance Audit (12/12/20/1582) that amongst others two issues requiring consideration were the visual impact and avian/ fauna.

With regard to the visual impact it was felt at that time that this would be low with regard to neighbouring properties but nevertheless turbines located within the National Park Viewshed protection zone should be relocated.

Extraordinarily, the conclusion now is that the wind turbines will have a high visual impact. More importantly, nowhere is there any consideration of or adaptation of the location of the turbine position to deal with the visual impact on the neighbouring nature reserves. The National Park is considered. The surrounding nature reserves have been ignored. This is irrational and renders the report, at least in this respect, invalid.

I refer to the radar tracking study by A.Jenkins et al ( 2014 ) included in your documents, in which he says “ The proposed wind farm remains directly in the main fly-way used by pelicans as they commute to and from Dassen Island. Given this, and given the strong possibility that the facility will impact negatively on local populations of other red-listed species, careful consideration should be given to abandoning this project “. I agree completely. The construction of the project simply renders the bird deaths considered by Mr Jenkins collateral damage arising from the project. Mr Jenkins of course does not even deal with the possible/ probable change in flight patterns negatively impacting on Jakkalsfontein and the other surrounding nature reserves. I am concerned that the significant bird life, including the pelican there, have simply been ignored in a report that focuses on the construction site itself and not the impact on surrounding properties.

I recognise that the number of turbines has been reduced from 35 to 33 in order to attempt to mitigate the avian fatalities, but am unconvinced that this will suffice. Since the time of the original EA, we have learnt that the Great White Pelican population on Dassen Island, previously thought stable, is already in decline. I would have thought that the intention is to preserve this rich avian heritage.

Other species at risk include the Black Harrier, of which there are less than 1000 left on the planet. Jakkalsfontein is a breeding site for these migrants, making them particularly vulnerable.

I am sure that you are aware that best practice globally discourages the erection of wind turbines on ridge lines in areas of raptor activity, due to the high mortality rate. It should also be discouraged here.

In the circumstances I am opposed to an extension of the EA, as well as the approval of an increase in wind turbine height, due to the extremely close proximity of the development to the Jakkalsfontein private nature reserve, as well as the threat it poses to local red-listed bird species, particularly the Great White Pelicans.

We live on a nature reserve zoned as such and as important as the nearby national park. To have enormous wind turbines with winking red lights at night on our eastern border would completely destroy the atmosphere of a nature reserve and all it stands for, as the visual impact would be disastrous. Exactly the same considerations as those in respect of the West Coast National Park should apply. I have dealt with the avian life.

Please confirm receipt of this email.

Regards

On Tue, Feb 23, 2021 at 6:47 PM Arthur James <~~arthur.james221@gmail.com~~> wrote:

Dear Amy

Thank you.

I cannot find the relevant website. Before lodging any objection I would like to ascertain whether my objections have already been dealt with. I can only find a 2019 EIA report. Is there an updated report? By when must objections be lodged?

kind Regards

On Tue, Feb 23, 2021 at 10:30 AM ERM South Africa – Engie Rheboksfontein EIA

<[Engie.Rheboksfontein@erm.com](mailto:Engie.Rheboksfontein@erm.com)> wrote:

Good morning Mr James

Thank you for your mail. You have been registered as an I&AP.

Kind regards,

Amy Rawlins

---

**From:** Arthur James <~~arthur.james221@gmail.com~~>

**Sent:** Friday, February 19, 2021 6:40 PM

**To:** ERM South Africa – Engie Rheboksfontein EIA <[Engie.Rheboksfontein@erm.com](mailto:Engie.Rheboksfontein@erm.com)>

**Subject:** Rheboksfontein Proposed Wind Farm

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Dear Sirs

I am a homeowner resident at Jakkalsfontein, close to the proposed windfarm development.

May I ask that you please register my interest and keep me copied on all public communications concerning this development.

Kind Regards

## Amy Rawlins

---

**From:** ~~Gerhard Gerber <gerhard.gerber@environment.gov.za>~~  
**Sent:** Wednesday, 24 February 2021 18:58  
**To:** ERM South Africa – Engie Rheboksfontein EIA  
**Cc:** Adri La Meyer  
**Subject:** RE: Public Participation Process extension for the Part Two EA Amendment for the Rheboksfontein Wind Energy Facility  
**Attachments:** DEA&DP comment\_Draft EA Amendment Report\_Rheboksfontein WEF\_Darling (1212201582AM6).pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Dear Amy

Hope you're well.

The e-mail communication received from the Department of Environmental Affairs, Forestry and Fisheries ("DEFF") on 01 February 2021, the e-mail correspondence sent to the environmental assessment practitioner ("EAP") on 02 February 2021 regarding proof of notification of the public participation process ("PPP") for the amendment application, the response received from the EAP via e-mail on 03 February 2021 and the Department's subsequent response on the same day, and the e-mail correspondences from the EAP dated 04 February 2021 regarding the extension of the PPP period refer.

The Department expresses its sincere appreciation to the EAP for extending the PPP period to allow the Department to participate in the application process for the proposed amendments to the environmental authorisation ("EA") for the Rheboksfontein wind energy facility ("WEF").

Find attached consolidated comments from various directorates within the Department on the Part Two Amendment Draft Report (hereinafter referred to as the "Draft Amendment Report") dated 09 December 2020 that was available for download from the website of the EAP.

Please acknowledge receipt of this e-mail.

Thank you

Kind regards  
Gerhard

**Gerhard Gerber**

~~Chief Director: Development Planning  
Department of Environmental Affairs & Development Planning~~

~~11<sup>th</sup> Floor, 1 Dorp Street, Cape Town, South Africa~~

~~For: +27 (0) 21 483 2787 or +27 (0) 83 2267 127  
Email: Gerhard.Gerber@environment.gov.za~~





**From:** ERM South Africa – Engie Rheboksfontein EIA <[Engie.Rheboksfontein@erm.com](mailto:Engie.Rheboksfontein@erm.com)>  
**Sent:** Thursday, February 4, 2021 16:18  
**To:** ERM South Africa – Engie Rheboksfontein EIA <[Engie.Rheboksfontein@erm.com](mailto:Engie.Rheboksfontein@erm.com)>  
**Subject:** Public Participation Process extension for the Part Two EA Amendment for the Rheboksfontein Wind Energy Facility

Good day all

Please note that the commenting period for the above-mentioned project has been extended until 24 February 2021 to allow stakeholders more time to submit comments.

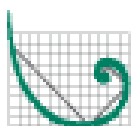
The Draft Amendment Report is available at:

- Darling Public Library
- Swartland Municipal Office (Tourism Bureau), 46 Main Road, Yzerfontein
- ERM Website: <https://www.erm.com/rheboksfontein-eia/>

You are invited to submit your comments and/or queries on the report to ERM.

Amy Rawlins  
Consultant

**ERM**  
1<sup>st</sup> Floor Great Westerford | 240 Main Road Rondebosch | 7700 | Cape Town | South Africa  
**W** [www.erm.com](http://www.erm.com)





## **environmental affairs**

Department:  
Environmental Affairs  
REPUBLIC OF SOUTH AFRICA

Private Bag X 447 · PRETORIA · 0001 · Environment House · 473 Steve Biko Road, Arcadia, · PRETORIA

DEA Reference: 12/12/20/1582/AM6

Enquiries: Ms Constance Musemburi

Telephone: (012) 399 9416 E-mail: [CMusemburi@environment.gov.za](mailto:CMusemburi@environment.gov.za)

Ms Stephanie Gopaul  
Environmental Resources Management Southern Africa (Pty) Ltd  
PostNet Suite 59  
Private Bag X 21  
**WESTVILLE**  
3630

Telephone Number: (031) 265 0033  
Email Address: [Stephanie.Gopaul@erm.com](mailto:Stephanie.Gopaul@erm.com)

**PER MAIL / EMAIL**

Dear Ms Gopaul

**COMMENTS ON THE DRAFT AMENDMENT REPORT FOR THE APPLICATION FOR AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION ISSUED ON 02 FEBRUARY 2012 FOR RHEBOKSFONTEIN WIND ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE ON A SITE NEAR DARLING, WESTERN CAPE PROVINCE.**

The Environmental Authorisation (EA) issued for the above application by this Department on 02 February 2012; the Application for Environmental Authorisation (EA) and Draft Amendment report received by the Department on 06 January 2021 and the acknowledgement letter from the Department dated 18 January 2021, refer.

The application for amendment of the EA addresses the following:

- i. The applicant, Moyeng Energy (Pty) Ltd intends to extend of the validity period of the EA. In addition, the applicant intends to amend the following:
  - Increased turbine rotor diameter: from 126m to 170m;
  - Increased hub height: from 120m to 130m;
  - Increased maximum output capacity: from 129MW to 140MW;
  - Removal of turbine locations 32 and 33;
  - Increased temporary laydown area: from 40m x 40m to 50m x 65m;
  - Removal of the restriction of a steel tower; and
  - Increased turbine footprint: from 15m x 15m to 25m x 25m.

The amendment is requested as the authorised technology is no longer the most efficient turbine model and it will ensure their project is amongst the forefront of technological advancements. The amendment will result in fewer turbines with increased MW output.

- ii. There are no amendments being applied for in terms of the grid connection and associated infrastructure related to the original EA.

The Department has the following comments on the abovementioned application.

- a. Please ensure that the following information as a minimum in terms of Regulation 32(1)(a) of the EIA Regulations, 2014:
  - an assessment of all impacts related to the proposed changes;
  - advantages and disadvantages associated with the proposed changes;
  - measures to ensure avoidance, management and mitigation of impacts associated with such proposed change in turbine specification and any other components proposed for amendment; and
  - any changes to the EMPr subsequent to additional mitigation recommendations by the specialist studies for the proposed project specifications.
- b. Please ensure that you submit the Layout Plan as authorised with the EA, as well as the Layout Plan for the proposed amendments.
- c. Please ensure that the final reports must include a motivation specific to the proposed amendment. The report must contain all the necessary information that is relevant to the changes applied for.
- d. The EAP must provide confirmation that the proposed amendment or and the changes does not, on its own, constitute a listed or specified activity in terms of the EIA Regulations, 2014 as amended;
- e. Please ensure that a list of registered interested and affected parties as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended is provided;
- f. Please ensure that 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 Amendment Report. Kindly ensure that the Square Kilometre Array (SKA) comments and comments from this Departments Biodiversity and Conservation Directorate are included in the document.
- g. Proof of correspondence with the various stakeholders, including organs of state which have jurisdiction in respect of the proposed activity, must be included in the final Amendment Report. Should you be unable to obtain such comments, proof should be submitted to the Department of the attempts that were made to obtain the comments.
- h. All issues raised and comments received during the circulation of the draft Amendment Report from I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final Amendment Report, including comments from this Department, and must be incorporated into a Comments and Response Report;
- i. All comments from I&APs must be adequately responded to. Please note that a response such as "noted" is not regarded as an adequate response to an I&AP's comments.
- j. The requirements of the acknowledgement letter 18 January 2021 must also be fulfilled.
- k. Please ensure that confirmation must be obtained from all the specialists that undertook studies from the original EIA process that there will be no new impacts that will arise from the proposed amendments. The specialists used as part of the original EIA process must provide comment.
- l. You are also advised to comply with the requirements of the Regulations 32 of the EIA Regulations 2014, as amended.

Further note that in terms of Regulation 45 of the EIA Regulations 2014, 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).

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

Yours sincerely



**Mr Sabelo Malaza**  
**Chief Director: Integrated Environmental Authorisations**  
**Department of Environmental Affairs**  
**Letter signed by: Ms Millicent Solomons**  
**Designation: Director: Prioritised Infrastructure Projects**  
**Date: 27/01/2021.**

|     |                    |                         |   |
|-----|--------------------|-------------------------|---|
| cc: | Mr Michael Steiner | Moyeng Energy (Pty) Ltd | Email: <a href="mailto:theo@omronde.co.za">theo@omronde.co.za</a>                             |
|     | Pieter van Zyl     | DEA:DP                  | Email: <a href="mailto:Pieter.vanZyl@westerncape.gov.za">Pieter.vanZyl@westerncape.gov.za</a> |

Sirs

I am a property owner at Jakkalsfontein, a private nature reserve located almost directly opposite the proposed site of the wind farm location. I would like to object, in the strongest terms, to the extension of the EA, as well as the increased size of the proposed turbines.

Jakkalsfontein is a 4000 acre reserve which is managed according to the strictest environmental protocols. To have a wind energy facility 300 metres from our front boundary flies in the face of all conservation aims and objectives destroys the atmosphere of a nature reserve through its ill-favoured visual impact, and, more importantly, would be a direct threat to several red-listed species of birds that traverse, breed and/or inhabit the reserve.

I notice from the recent EA submission that the number of proposed turbines has been reduced from 35 to 33 presumably in an attempt to mitigate avian fatalities? But I am not convinced that this will sufficiently reduce the prospective carnage that is known to be caused by such on-shore installations around the world. As you are doubtless aware, best practice actively discourages the erection of wind turbines on ridge lines in areas of raptor activity, due to the high mortality rate.

I would appreciate confirmation of receipt of this email.

Yours faithfully,

~~Denis Tuchten~~  
~~Portion G1 Cormorant~~  
~~Jakkalsfontein.~~

22 February 2021

**ERM REF: 0554699**

**DEA REF: 12/12/20/1582**

**RHEBOKSFONTEIN WIND ENERGY PROJECT**

**PART TWO AMENDMENT DRAFT REPORT**

Good afternoon Sirs,

### **Introduction**

Thank you for confirming my registration as an Affected Party for the above Rheboksfontein project. I object in the strongest terms, to the extension of the above Energy project Application.; as well as the increase in the height of the Wind turbines.

### **Nearby owner**

I am an owner at Jakkalsfontein Nature Reserve, an exclusive private nature reserve. Cape Nature is the ultimate custodian of the reserve, which is managed according to the strictest environmental protocols, regarding both flora and fauna. To have Wind harvesting activities of the above planned magnitude so close to our private reserve, would impact negatively on the ongoing efforts of our management team and their efforts to apply internationally accepted conservation principles.

### **Wind turbines are prone to noise disturbances**

A hated disadvantage of wind turbines is the noise they produce. The sound produced by one turbine can be perceived from far distances. Combine many turbines, and the noise becomes unbearable. Many nearby persons' lives may be turned upside down due to the noise pollution from turbines. It will certainly also affect wildlife inside our nature reserve. This explains the strong public objections to wind turbine installations in many locations.

### **Reduction of the local bird population**

Wind turbines are particularly disadvantageous to the local bird species. A lot of bird's death as a result of a collision with turbine blades has been reported near Wind turbine installations. This may wipe out the population of certain bird species. Also, wind turbines require them to dig deep into the earth which could have a negative effect on the underground habitats.

I often watch the Great White Pelicans migration flights over the Jakkalsfontein nature reserve and nearby region. They regularly appear in impressive formations whilst following their leaders all grouped together in swarms up to 50 birds. These birds are large and fly in a rather 'clumsy' way. It would be heart-breaking to see them caught up between enormous Wind turbine blades desperately trying to avoid certain death.

With reference to the radar-tracking study by A. Jenkins et al (2014) included in your documentation, in which is stated: "The proposed wind farm remains directly in the main fly-way used by Pelicans as they commute to and from Dassen Island. Given this and given the strong possibility that the facility will impact negatively on local populations of other red-listed species, careful consideration should be given to abandoning this project ". I am fully in agreement. The graph on page 40 of the report indicates that the Great White Pelican population of Dassen Island will virtually disappear soon. I am also convinced that like-minded conservationists internationally, will be equally concerned.

This part of South Africa is well known for its rich and diverse collection of birdlife. A reduction of 35 to 33 turbines to mitigate avian fatalities, is too little and will not suffice. Since the time of the original E.A. survey, we have learnt that the Great White Pelican population on Dassen Island, previously thought stable, is already in decline. The proposal in question will directly contribute to hasten their extinction without any doubt.

Other species at risk include the Black Harrier, of which there are apparently less than a thousand left on the entire planet. Jakkalsfontein nature reserve is a recognised breeding site for these migrants, making them particularly vulnerable.

Also, best practice globally discourages the erection of Wind turbines on ridge lines in areas of high raptor activity. Due to their high mortality rate under such circumstances, it should be discouraged in this location.

NB: It is imperative to notice that the world is watching us. Should the proposed Rhebokfontein Wind Energy Project go ahead notwithstanding these clear warnings, the developers will ultimately be held accountable.

### **Wind turbines have a visual impact**

Although wind turbines come with eye-catching designs, they impact the natural beauty of the landscape. When a lot more wind turbines are set up, the area becomes unsightly.

Though some believe that wind turbines look nice, most disagree. People generally consider wind turbines an undesirable experience. The visual pollution is a major reason why people do not find it attractive and are opposed to their installation.

### **Conclusion**

I am opposed to an extension of the Energy project Application.; including increasing the Wind turbine height. This, due to the proximity of the development to the Jakkalsfontein private nature reserve, as well as the threat it poses to local red-listed bird species; particularly the Great White Pelicans.

I live in Jakkalsfontein private nature reserve because it is a nature reserve, with no threat of increased residential/commercial density and a sense of peace and tranquility that pervades the reserve. To have enormous Wind turbines with flickering lights at night on our doorstep would destroy the atmosphere of a nature reserve and all it stands for, as the visual impact would be disastrous and contradicting the very purpose of a nature reserve.

Kindly confirm receipt of this e-mail and provide acknowledgment as an objection to the proposal of extension of authorisation; as well as the proposed increase in the height of the Wind turbines.

Yours Sincerely,



**Dr. Gerhard Brümmer**

~~125 Prover~~

~~Jakkalstentem Nature Reserve~~

~~E-mail: gerhard.brummer@outlook.com~~

~~Cell: 0833361755~~