

APPENDIX F7

**COMMENTS RECEIVED ON REVISED DRAFT
REPORT**

Amy Rawlins

From: Lizell Stroh <Strohl@caa.co.za>
Sent: Friday, 16 April 2021 16:43
To: ERM South Africa – Engie Rheboksfontein EIA
Subject: RE: Revised Draft Amendment Report - Public Participation Process for the Part Two EA Amendment for the Rheboksfontein Wind Energy Facility

Follow Up Flag: Follow up
Flag Status: Completed

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 dayi, please follow the SACAA procedure on amendments as per the CAA website.

<http://www.caa.co.za/Pages/Obstacles/Urgent-notice.aspx>

Obstacle Notice 4/2020 Amending Obstacle Information

Kindly note that with immediate effect, assessments will be conducted on the obstacle information as it stands in the application as provided to the Obstacle Inspectorate.

Should applicants wish to amend the information in an application, applicants will be required to resubmit a new application which will be subject to the fees as published in Part 187.

Please also note that obstacle assessments will be conducted on obstacles applications only after payment in full has been received and confirmed by our finance office.

Kind regards



Lizell Stroh
Obstacle Inspector
PANS-OPS Section
Air Navigation Services Department
Tel: +27 11 545 1232 | **Mobile:** +27 083 461 6660
Email: Strohl@caa.co.za | www.caa.co.za

Foll us on    

From: ERM South Africa – Engie Rheboksfontein EIA <Engie.Rheboksfontein@erm.com>
Sent: Friday, 16 April 2021 12:35
To: ERM South Africa – Engie Rheboksfontein EIA <Engie.Rheboksfontein@erm.com>
Subject: Revised Draft Amendment Report - Public Participation Process for the Part Two EA Amendment for the Rheboksfontein Wind Energy Facility

Dear Interested and Affected Party

Changes have been made to the Draft Amendment Report for the above-mentioned Project as a result of comments received during the public participation process. The Revised Draft Amendment Report is hence available for public participation process for 30 days in terms of Regulation 32(b) of the EIA Regulations 2014 (as amended). Please refer to the attached letter for more detail.

The Revised Draft Amendment Report is available from 16 April to 17 May on the ERM Website:

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

You are invited to submit your comments and/or queries on the Revised Draft Amendment Report to ERM on or before 17 May 2021.

Kind Regards,
ERM



ERM *The business of sustainability*

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>



CONSECUTIVE CLEAN AUDITS



*Ons gee gestalte aan 'n beter toekoms!
We shape a better future!
Sibumba ikamva elingcono!*

File ref: 15/3/10-15/Farm_567,571,551/01,1199,568,574/01,552/02

Enquiries:
Mr AJ Burger

21 April 2021

ERM South Africa Engie.Rheboksfontein@erm.com

Dear Sir/Madam

REVISED DRAFT AMENDMENT REPORT – PUBLIC PARTICIPATION PROCESS FOR THE PART TWO EA AMENDMENT FOR THE RHEBOKSFONTEIN WIND ENERGY FACILITY – FARM NO. 567, REMAINDER FARM NO. 571, PORTION 1 OF FARM NO. 551, FARM NO. 1199, FARM NO. 568, PORTION 1 OF FARM NO. 574 AND PORTION 2 OF FARM NO. 552, DIVISION MALMESBURY

Your correspondence dated 15 April 2021 regarding the subject refers.

A land use approval for a consent use for renewable energy structures was approved by Swartland Municipality on the subject properties on 15 August 2013 in terms of the Land Use Planning Ordinance, Ordinance 15 of 1985.

Planning legislation in South Africa changed on 1 July 2015 when the Spatial Planning and Land Use Management Act, Act 16 of 2013 came into effect. Also, since then, the Land Use Planning Act, Act 3 of 2014 and the Municipal Land Use Planning By-law (PG 8226 of 25 March 2020) came into effect.

The consent use approval issued by Swartland Municipality on 15 August 2013 was only valid for a period of 5 years from 1 July 2015. As the validity period of the land use approval was not extended before 1 July 2020, the land use approval lapsed.

Please note that a land use application need to be made in terms of Section 25(2) of the Swartland Municipality: Municipal Land Use Planning By-law (PG 8226 of 25 March 2020) in order to obtain land use rights for the renewable energy structures.

Yours sincerely

MUNICIPAL MANAGER
per Department Development Services
AJB/ds

Rig asseblief alle korrespondensie aan:

Die Munisipale Bestuurder
Privaatsak X52
Malmesbury 7299

Darling Tel: 022 492 2237

Tel: 022 487 9400

Faks/Fax: 022 487 9440

Epos/Email: swartlandmun@swartland.org.za

Moorreesburg Tel: 022 433 2246

Kindly address all correspondence to:

The Municipal Manager
Private Bag X52
Malmesbury 7299

Yzerfontein Tel: 022 451 2366

ALEXANDERFONTEIN BOERDERY (PTY) LTD

Registration no: 2014/101412/07, VAT No: 4210208627

P O Box 144, Darling, 7345

Tel: 022 492 3171, Fax: 022 492 2785

10 May 2021

ERM
1st Floor Great Westerford
240 Main Road Rondebosch
7700
Cape Town
South Africa
W www.erm.com

Attention: Amy Rawlins

Comments on the revised draft report for the Rheboksfontein Wind Energy Project Part Two Amendment dated 15 April 2021.

I refer to our site visit and meeting with Mr Schalk van der Merwe on Alexanderfontein 19 January 2021. At this meeting, I, the managing director of Alexanderfontein Boerdery (Pty) Ltd, Mr Nicolaas Basson, indicated that I am prepared to live with the WEF, providing that 2 specific problematic wind turbine locations are either relocated or the turbines are removed. The relevant two turbines (locations 34 and 35, Figure 4.1) are located within 1.2 km and 900 m respectively of the newly established entertainment facility.

The outcomes of the meeting were assessed and addressed in the revised report. According to the maps included in Appendix G, turbines 34 and 35 was not removed or relocated.

The following recommendations were made in the Social Impact Assessment Rheboksfontein Wind Energy Facility Amendment Western Cape Province, January 2021 by Tony Barbour and Schalk van der Merwe.

“Recommendations

The establishment of the proposed Amended Rheboksfontein WEF is supported by the findings of the SIA. However, consideration should be given to relocating turbine 34 and 35 in order reduce the visual impact on the newly established entertainment facility on Alexanderfontein Farm”.

As indicated in the report, turbine 34 and 35 should be relocated. The specialist recommended that the applicants meet with the affected landowners to discuss the possibility of relocating wind turbines 34 and 35 that has the highest potential visual impact. As indicated above, turbine 34 and 35 should be relocated.

In terms of the Rheboksfontein Wind Energy Facility Part Two Amendment: Revised Avifauna Verification and Assessment Update, Peter Wright, 15 April 2021 the impact of the management program for around 400 ha of small parcels of veld as currently followed, mainly with the aim of reversing historic Renosterbos encroachment, thus clearing up space for the previously suppressed

ALEXANDERFONTEIN BOERDERY (PTY) LTD

Registration no: 2014/101412/07, VAT No: 4210208627

P O Box 144, Darling, 7345

Tel: 022 492 3171, Fax: 022 492 2785

geophytes to flower, was considered in the revised assessment. The change in habitat over recent years has resulted in more diverse and more abundant bird life and biodiversity on the property.

However, no recommendations were made to remove or relocate turbines 34 and 35. The following conclusions and results were recorded in the report.

“The majority of martial eagle flight activity (14 flights) occurred to the south of the Project site where turbines 32 and 33 were located close to slopes supporting more natural habitat and higher vegetation that may have provided suitable foraging areas for martial eagle. These turbine positions have been removed from the revised Project”.

The revised avifauna assessment in table A.1 (Total At Risk Great White Pelican Flights Per Breeding Season) recorded for turbine 34 (61 – number of high risk flights) and 35 (349 – number of high risk flights) which is significantly higher risk than all the others.

Turbines 32 and 33 were removed from the proposed development as they were located close to slopes supporting more natural habitat and higher vegetation that may have provided suitable foraging areas for martial eagle. Turbines 34 and 35 is also located close to slopes supporting more natural habitat and higher vegetation that may have provided suitable foraging areas for martial eagle. A significant portion of the management program for around 400 ha of small parcels of veld as currently followed is located on these slopes in close proximity to turbines 34 and 35.

In conclusion

I am prepared to live with the WEF, providing 2 specific problematic locations are addressed (turbines scrapped or relocated). The relevant two turbines (locations 34 and 35) would be located in significant proximity (1.2 km and 900 m, respectively) from the entertainment facility, prominently exposed as a result of slope, and directly within the primary viewshed from the client entertainment facility.

Considering the recommendations made in the socio-economic study, as well as similar habitat which resulted in the removal of turbines 32 and 33 from the revised layout exists close to turbines 34 and 35. Also the fact that a significant higher **Total At Risk Great White Pelican Flights Per Breeding Season** predicted at turbines 34 and 35, we recommend that a risk adverse approach be followed.

The recommendations made by the socio economic specialist that *“the applicants meet with the affected landowners to discuss the possibility relocating wind turbines that have the highest potential visual impact. As indicated above, turbine 34 and 35 should be relocated”* or that turbines 34 and 35 be removed from the revised layout is therefore requested.



Nicolaas Basson

Amy Rawlins

From: Admin <admin@jkf.co.za>
Sent: Friday, 14 May 2021 11:21
To: ERM South Africa – Engie Rheboksfontein EIA
Subject: Revised Draft Amendment Report - Public Participation Process for the Part Two EA Amendment for the Rheboksfontein Wind Energy Facility
Attachments: Rheboksfontein revised Draft Report April 2021 JHA response.pdf
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.

JAKKALSFONTEIN



NATURE RESERVE

PRIVATE BAG X2 • DARLING • SOUTH AFRICA • 7345 • WEST COAST ROAD (R27) •
TEL +27 22 409 2911 • FAX +27 22 409 2313
email admin@jkf.co.za

ERM
1ST Floor
Great Westerford
240 Main Road,
Rondebosch
7700

14 May 2021

ERM Team,

With reference to your e mail below, please see response of the Board Chairman of the Jakkalsfontein Homeowners Association attached.

Regards,

Steyn Marais

Manager: Jakkalsfontein Nature Reserve

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

From: ERM South Africa – Engie Rheboksfontein EIA [mailto:Engie.Rheboksfontein@erm.com]
Sent: Friday, 16 April 2021 12:35
To: ERM South Africa – Engie Rheboksfontein EIA
Subject: Revised Draft Amendment Report - Public Participation Process for the Part Two EA Amendment for the Rheboksfontein Wind Energy Facility

Dear Interested and Affected Party

Changes have been made to the Draft Amendment Report for the above-mentioned Project as a result of comments received during the public participation process. The Revised Draft Amendment Report is hence available for public participation process for 30 days in terms of Regulation 32(b) of the EIA Regulations 2014 (as amended). Please refer to the attached letter for more detail.

The Revised Draft Amendment Report is available from 16 April to 17 May on the ERM Website:

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

You are invited to submit your comments and/or queries on the Revised Draft Amendment Report to ERM on or before 17 May 2021.

Kind Regards,
ERM



ERM *The business of sustainability*

JAKKALSFONTEIN



NATURE RESERVE

PRIVATE BAG X2 • DARLING • SOUTH AFRICA • 7345 • WEST COAST ROAD (R27) •
TEL +27 22 409 2911 • FAX +27 22 409 2313
email admin@jkf.co.za

Environmental Resources Management Southern Africa
240 Main Road
Rondebosch 7700

12 May 2021

Rheboksfontein Wind Energy Project Part 2 Amendment Draft Report – Revised, dated 15 April 2021

The Board of the Jakkalsfontein Homeowners Association (JHA) took notice of the revised draft report prepared after objections were raised. We appreciate the efforts to attend to our concerns. However, Section 8.7, on visual impacts, remains unchanged.

We wish to reiterate that for the last 10 years this was a key element of our objections to this development. Even though the amended draft report keeps its assessment of impacts at “moderate to high significance” levels, no changes are proposed. We therefore repeat our objections raised in our document dated 22 February 2021:

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.

We trust that this objection would remain a serious consideration in your deliberations.

Amy Rawlins

From: Eva Orbis <eva@casaorbis.com>
Sent: Friday, 14 May 2021 14:45
To: ERM South Africa – Engie Rheboksfontein EIA
Subject: Objection to extension

Follow Up Flag: Follow up
Flag Status: Completed

WARNING: The sender of this email could not be validated and may not match the person in the "From" field.

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.

To whom it may concern;

As a registered 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, which will have a significant visual impact on Jakkalsfontein, a private nature reserve neighbouring the proposed development.

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.

Having perused the updated documents, I note, with concern, that there has been no mitigation of the visual impact, as contained in the original proposal. Not only will this be extremely unsightly, particularly to homeowners in Jakkalsfontein, but it will also have a negative impact on the value of our properties, due to visual pollution.

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 will still poses to local red-listed bird species, particularly the Great White Pelicans. Although the impact on avifauna has been mitigated, it still remains. 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 objecting to the proposed increase in the height of the wind turbines.

Kind regards,

Eva Orbis
Sent from my iPhone

Amy Rawlins

From: Wesley J Fisher <Wesley.Fisher@westerncape.gov.za>
Sent: Monday, 17 May 2021 14:16
To: ERM South Africa – Engie Rheboksfontein EIA
Cc: Linde Govender; HoD Community Safety
Subject: FW: Revised Draft Amendment Report - Public Participation Process for the Part Two EA Amendment for the Rheboksfontein Wind Energy Facility
Attachments: Stakeholder Notification Letter Revised Draft Report.pdf

WARNING: The sender of this email could not be validated and may not match the person in the "From" field.

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 ERM South Africa

Herewith find our written confirmation that nil commentary will be submitted by our department.

Sent on behalf of the WCG Department of Community Safety's senior management.

Kind regards

Wesley J Fisher *Professional Accountant (SA)*
Deputy Director: Strategic Planning & Knowledge Management
Chief Directorate: Management Support
WCG Department of Community Safety

Office: +27 21 483 3414
Mobile: +27 84 513 5309
PhysicalAddress: 35 Wale Street 4th Floor, Cape Town, South Africa, 8001
Website: www.westerncape.gov.za

From: Linde Govender <Linde.Govender@westerncape.gov.za>
Sent: Friday, April 16, 2021 2:24 PM
To: Wesley J Fisher <Wesley.Fisher@westerncape.gov.za>
Subject: FW: Revised Draft Amendment Report - Public Participation Process for the Part Two EA Amendment for the Rheboksfontein Wind Energy Facility

Hi

Kindly respond on our behalf.

Thanks

Regards

Lindè Govender CA(SA)
Chief Director: Management Support
Chief Directorate: Management Support
Department of Community Safety
Western Cape Government

Address: 4th floor, 35 Wale Street, Cape Town, South Africa, 8001

Office: + 27 (0)21 483 5694

Fax: + 27 (0)21 483 3514

E-Mail: Linde.govender@westerncape.gov.za

Website: www.westerncape.gov.za



Be 110% Green. Read from the screen

From: HoD Community Safety <Hod.Comsafe@westerncape.gov.za>

Sent: Friday, 16 April 2021 14:07

To: Linde Govender <Linde.Govender@westerncape.gov.za>

Cc: Wesley J Fisher <Wesley.Fisher@westerncape.gov.za>; Terresa De Villiers <Terresa.deVilliers@westerncape.gov.za>

Subject: FW: Revised Draft Amendment Report - Public Participation Process for the Part Two EA Amendment for the Rheboksfontein Wind Energy Facility

Dear Lindè

For your attention and finalization please.

Thank you

Petro

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

Sent: Friday, April 16, 2021 12:35 PM

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

Subject: Revised Draft Amendment Report - Public Participation Process for the Part Two EA Amendment for the Rheboksfontein Wind Energy Facility

Dear Interested and Affected Party

Changes have been made to the Draft Amendment Report for the above-mentioned Project as a result of comments received during the public participation process. The Revised Draft Amendment Report is hence available for public participation process for 30 days in terms of Regulation 32(b) of the EIA Regulations 2014 (as amended). Please refer to the attached letter for more detail.

The Revised Draft Amendment Report is available from 16 April to 17 May on the ERM Website:

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

You are invited to submit your comments and/or queries on the Revised Draft Amendment Report to ERM on or before 17 May 2021.

Kind Regards,



DEPARTMENTAL REFERENCES:

16/3/3/6/4/1/1/F5/5/2016/21 (Development Management)

19/2/5/3/F5/5/WL0011/21 (Waste Management)

19/4/4/1/BS3 – Rheboksfontein Wind Energy Facility (Air Quality Management)

DATE: 17 May 2021

The Board of Directors
Environmental Resources Management Southern Africa (Pty) Ltd
1st Floor Great Westerford Building
240 Main Road
RONDEBOSCH
7700

For attention: Ms Amy Barclay

Tel: (021) 681 5400

E-mail: Engie.Rheboksfontein@erm.com

PER E-MAIL

Dear Madam

COMMENTS ON THE REVISED DRAFT AMENDMENT REPORT FOR THE PROPOSED AMENDMENTS TO THE ENVIRONMENTAL AUTHORISATION FOR THE RHEBOKSFONTEIN WIND ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE ON THE REMAINING EXTENT OF FARM RHEBOKSFONTEIN NO. 568, FARM NIEUWE PLAATS NO. 567, REMAINING EXTENT OF FARM BONTEBERG NO. 571, PORTION 1 OF FARM DOORNFONTEIN NO. 574, PORTION 1 OF FARM PLAT KLIP NO. 551, FARM GROOT BERG NO. 1199, AND PORTION 2 OF FARM SLANG KOP NO. 552, DARLING (DFFE REF NO: 12/12/20/1582/AM6)

The Part Two Amendment Draft Report dated 09 December 2020, the Department's comments thereto dated 24 February 2021 and the e-mail notification of 16 April 2021 informing interested and affected parties of the availability of a Revised Draft Amendment Report, refer.

Thank you for the opportunity to participate in the amendment application process for the proposed amendments to the environmental authorisation ("EA") for the Rheboksfontein wind energy facility. Please find collated comments from various directorates in the Department on the Part Two Amendment Revised

Draft Report (hereinafter referred to as the "Revised Draft Amendment Report") dated 15 April 2021 that was available for download from the website of the environmental assessment practitioner ("EAP").

1. Directorate: Development Management (Region 1) – Mr Bernard Kgosana/ Ms K. Adriaanse (Bernard.Kgosana@westerncape.gov.za / Keagan-Leigh.Adriaanse@westerncape.gov.za):
 - 1.1. This Directorate notes that the similarly listed activities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") Environmental Impact Assessment ("EIA"), Regulations, 2014 (as amended) have been included in the Revised Draft Amendment Report. This Directorate further notes that no new listed activities in terms of the NEMA EIA Regulations, 2014 (as amended) have been identified as a result of the proposed amendments.
 - 1.2. This Directorate notes that a Screening Tool Report (generated from the National Web Based Environmental Screening Tool) has not been provided. This Directorate advises that a Screening Tool Report should be included in the Final Amendment Report to be submitted to the competent authority for decision-making.
 - 1.3. In addition, a Site Sensitivity Verification Report (required in terms of the "*Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Section 24(5) (a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation*") has not been included in the Revised Draft Amendment Report. A Site Sensitivity Verification Report which confirms or disputes the current land use and environmental sensitivities as identified by the Screening Tool, should be included in the Final Amendment Report to be submitted to the competent authority.
 - 1.4. This Directorate notes that Figure 4-4 of the Revised Draft Amendment Report provides the road network overlain by ecological sensitivity. This Directorate further notes that new roads fall within areas of low ecological sensitivity.
 - 1.5. The Revised Avifaunal Verification and Assessment Update compiled by ERM dated 15 April 2021 indicates that the assessment is a draft report. The final specialist report must be included in the Final Amendment Report to be submitted to the competent authority.
 - 1.6. The additional mitigation measures for the potential avifaunal impacts are supported and must be strictly implemented.
2. Directorate: Waste Management - Mr Gary Arendse (Gary.Arendse@westerncape.gov.za):
 - 2.1. This Directorate notes that its previous comments on the Part Two Amendment Draft Report have been responded to in the Comments and Response Report ("C&RR") (Appendix F6) and incorporated in the EMPr. This Directorate has no further comments on the Revised Draft Amendment Report.

3. Directorate: Air Quality Management - Mr Sibusiso Sinuka (Sibusiso.Sinuka@westerncape.gov.za):
 - 3.1. This Directorate has reviewed the Revised Draft Amendment Report and notes that the EAP has addressed all previous comments in the C&RR and incorporated responses in the Revised Draft Amendment Report and EMPr. Please however note that the EMPr must explicitly indicate that the generation of dust must comply with the National Dust Control Regulations (Government Notice No. R. 827 of 1 November 2013) promulgated in terms of National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004).
4. Directorate: Development Facilitation - Ms Adri La Meyer (Adri.LaMeyer@westerncape.gov.za):
 - 4.1. This Directorate notes that its comments on the Part Two Amendment Draft Report have been responded to in the C&RR and incorporated in the Revised Draft Amendment Report and EMPr. It is further noted that an updated layout plan superimposing the proposed wind turbines and associated structures and infrastructure on the environmental sensitivities have been included as Figure 4-4 of the Revised Draft Amendment Report.
 - 4.2. This Directorate reiterates for the attention of the competent authority that should approval be granted for the proposed amendments, that it is recommended that the competent authority replaces the existing EA (and subsequent amendments) with an updated EA.
5. The applicant is reminded of its "*general duty of care towards the environment*" as prescribed in section 28 of the NEMA, 1998 which states that "*Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment.*"
6. Please direct any enquiries via e-mail to the official/s indicated in this correspondence should you require any clarity on any of the comments provided.
7. The Department reserves the right to revise or withdraw comments and request further information based on any information received.

Yours faithfully

Gerhard Gerber Digitally signed by Gerhard Gerber
Date: 2021.05.17 14:32:07 +02'00'

pp **HEAD OF DEPARTMENT**

DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

Amy Rawlins

From: Andrea Gibb <Andrea.Gibb@enertrag.co.za>
Sent: Monday, 17 May 2021 16:57
To: ERM South Africa – Engie Rheboksfontein EIA
Cc: Amy Rawlins
Subject: RE: Revised Draft Amendment Report - Public Participation Process 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 Amy

Thank you for providing us with the opportunity to comment on the Revised Draft Amendment Report. We acknowledge that our previous comments have been captured and responded to in the Comments and Response Report. We also note that the EMPr does mention that a Wake Effect Assessment should be undertaken by a mutually agreed third party accepted by ENGIE, MOYENG ENERGY and ENERTRAG. We are in agreement with these statement but request that the following also be added to the EMPr prior to submitting the Final Amendment Report to DEFF for decision making:

- Third party to be accepted by ENGIE, MOYENG ENERGY, DARLING WIND POWER and ENERTRAG SOUTH AFRICA.
- Should the Wake Impact Assessment conclude that the Rheboksfontein Wind Energy Facility will impact the existing Darling Wind Farm, a Wake Loss Compensation Agreement must be entered into prior to the start of construction.

Kind Regards,
Mrs. Andrea Gibb
Senior Project Developer

Tel. +27 21 207 2185 | Mob. +27 78 152 6091 | Andrea.Gibb@enertrag.co.za | Suite 104, 1ST Floor | Albion Springs | 183 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

This email contains confidential information. It is intended solely for use by the recipient and others authorized to receive it. If you are not the intended recipient, any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful. If you are not the intended recipient of this message, please notify the sender by replying to this message and then delete the message and any copies from your system. Any use, dissemination, distribution, or reproduction of this message by unintended recipients, is not authorised and may be unlawful.

From: ERM South Africa – Engie Rheboksfontein EIA <Engie.Rheboksfontein@erm.com>
Sent: Friday, 16 April 2021 12:35
To: ERM South Africa – Engie Rheboksfontein EIA <Engie.Rheboksfontein@erm.com>
Subject: Revised Draft Amendment Report - Public Participation Process for the Part Two EA Amendment for the Rheboksfontein Wind Energy Facility

Dear Interested and Affected Party

Changes have been made to the Draft Amendment Report for the above-mentioned Project as a result of comments received during the public participation process. The Revised Draft Amendment Report is hence available for public



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
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

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

PER MAIL / EMAIL

Dear Ms Gopaul

COMMENTS ON THE REVISED 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) for the above-mentioned project dated 25 September 2019, the application for amendment of the EA and the revised draft amendment report received by the Department on 16 July 2020, the acknowledgement letter dated 23 July 2020, the Department's comments on the draft amendment reports dated 29 January 2021 and the amended draft amendment reports received by the Department on 16 April 2021 refer.

The Department has the following comments on the abovementioned amendment application:

(a) Specific Comments

- (i) Please ensure that the application form must include and describe the detailed amendments that are being applied for. When doing so, please quote the page number of the EA, the condition/section affected, the existing information (if necessary) and what is the required amendment/inclusion.

For example:

Page 3 of the EA, point 6 of the Specific Conditions stated as:

6. The 100m buffer from the road shall be maintained.

is requested to be amended to:

6. The 150m buffer from the road and nearby dam shall be maintained.

Note that if detailed amendments are not requested clearly in the application form, they will not appear in the decision for e.g amendments to the EMP or layout map.

- (ii) The EAP is to ensure that all the amendments applied for do not trigger any listed or specified activity as outlined in Regulation 31 of the EIA Regulations, 2014 as amended. Ensure that there is clear motivation to the proposed amendments occurring within the approved footprint of the existing authorisation (can be supported with a layout map).

(j) Public participation

- (i) From the information presented in the amended draft amendment report, it is noted that there are concerns and objections from the interested and Affected Parties (I&APs), specifically concerns from Birdlife South Africa with regards to, *inter-alia*, impact on the avifauna. Birdlife suggested that the impact assessment and mitigation strategy be revisited, and supported by up-to-date data collected for the site combined with recent relevant literature on impacts on birds in South Africa. You are required to adequately address these concerns and any other objections with regards to the proposed amendment. The recommendations to be presented in the final amendment reports must meet both the applicant's requirements as well as addressing objections raised by I&APs, (including the landowners).
- (ii) Please ensure that comments from all relevant stakeholders are submitted to the Department with the final report. This includes but is not limited to the Western Cape Department of Environmental Affairs and Development Planning (DEA:DP), the South African Heritage Resources Agency (SAHRA), BirdLife SA, and this Department's Biodiversity and Conservation Directorate. A Comments and Response trail report (C&R) must be submitted with the final report. The C&R report must incorporate all comments for this application. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Appendix 1 of this comments letter. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as "noted" is not regarded as an adequate response to I&AP's comments.
- (iii) Please ensure that all issues raised and comments received during the circulation of the draft amendment report from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final report. Proof of correspondence with the various stakeholders must be included in the final amendment report. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014 as amended.
- (iv) The final amendment report must also indicate that this draft amendment report has been subjected to a public participation process.

(k) Layout & Sensitivity Maps

- (i) A copy of the layout map must be submitted with the final report. All available biodiversity information must be used in the finalisation of the layout map. Existing infrastructure must be used as far as possible e.g. roads. The layout map of the proposed amendment must indicate the following:
- All preferred turbine positions must be clearly numbered. The turbine position numbers must be consistently used in all maps to be included in the final report.
 - All supporting onsite infrastructure e.g. roads (existing and proposed);
 - The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected;
 - Buffer areas; and
 - All "no-go" areas.

- The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure.

(ii) Google maps will not be accepted.

(l) **Specialist assessments**

- (i) Please ensure that the wake effect specialist study is included in the final reports.
- (ii) The EAP must provide confirmation that all specialists were provided with the same request of proposed amendments as well as ensure that the terms of reference for all the identified specialist studies include the following:
 - (a) A detailed description of the study's methodology; indication of the locations and descriptions of the development footprint, and all other associated infrastructures that they have assessed and are recommending for authorisations.
 - (b) Provide a detailed description of all limitations to the studies. All specialist studies must be conducted in the right season and providing that as a limitation will not be allowed.
 - (c) Please note that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the 'no-go' areas.
 - (d) Should the specialist definition of 'no-go' area differ from the Department's definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.
 - (e) All specialist studies must be final, and provide detailed/practical mitigation measures and recommendations, and must not recommend further studies to be completed post EA.
 - (f) Should specialists recommend specific mitigation measures for identified turbine positions, these must be clearly indicated.
 - (g) Clearly defined cumulative impacts and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.
 - (h) A detailed process flow to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.
 - (i) Identified cumulative impacts associated with the proposed development must be rated with the significance rating methodology used in the process.
 - (j) The significance rating must also inform the need and desirability of the proposed development.
 - (k) A cumulative impact environmental statement on whether the proposed development must proceed.
- (i) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expertise advice.

(m) **General**

Please ensure that all mitigation recommendations are in line with applicable and most recent guidelines.

Should you fail to meet any of the timeframes stipulated in Regulation 32 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.

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 faithfully





Mr Sabelo Malaza
Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment
Letter signed by: Ms Millicent Solomons
Designation: Director: Priority Infrastructure Projects
Date: 14/05/2021.

cc:	Mr Michael Steiner	Moyeng Energy (Pty) Ltd	Email: theo@ormonde.co.za
	Pieter van Zyl	DEA:DP	Email: Pieter.vanZyl@westerncape.gov.za

APPENDIX F8

COMMENTS AND RESPONSE REPORT

Comments and Responses: Draft Amendment Report

No.	Date	Comment	Initial Response	Technical response
1	21/01/2021 Meeting Nico Basson Landowner	<p>Mr Nicolaas Basson (neighbouring landowner) has constructed an entertainment facility on Alexanderfontein Farm. Mr Basson, indicated that turbines locations 34 and 35 impact on the views from a newly established entertainment facility on Alexanderfontein Farm (built 2019). He has requested that these two turbines be relocated.</p> <p><i>Figure: Location of new entertainment facility on Alexanderfontein Farm in relation to turbines 34 and 35.</i></p> 		<p>The position of the two turbines in question (34 and 35) has not changed with the latest amendments. The stakeholder constructed the entertainment area between May and August 2020, and was at the time aware of the authorised positions of the proposed wind farms. The social specialist has however included a recommendation in the Updated Social Impact Assessment (Appendix D) that consideration should be given to relocating turbine 34 and 35 in order to reduce the visual impact on the newly established entertainment facility on Alexanderfontein Farm.</p> <p>The Visual Impact Specialist has reviewed the analysis and undertaken a comparative analysis to compare the visual impact from the new entertainment facility. A photograph taken from the entertainment facility viewpoint was overlaid with a simulation of the approved and proposed turbines 34 and 35 onto a Google Earth image. The findings are presented below:</p> <p>The proposed amendments would slightly increase the visibility of the project and its visual exposure. These changes, however, would have a minor negative effect when compared to the approved facility. A low magnitude and significance of the impact associated with the change in the visual characteristics of the study area is predicted. Mitigation measures as per the original VIA report must be upheld.</p> <p>The comparative analysis in the basic simulation below illustrates that the impact of the proposed vs the approved will be slightly greater (i.e. the difference would be moderate to low (i.e. over and above the impact that would be created by the approved option)).</p> <p><i>Figure: viewpoint analysis from the new entertainment facility showing the authorised turbines compared to the larger turbines.</i></p> 
		<p>Mr Basson also notified ERM that he is in the process of restoring about 400 Ha of Renosterveld vegetation on his properties, Bontberg and Alexanderfontein. He believes that this has resulted in an increase in species diversity, which has resulted in an increase in avifauna species richness and diversity in the area.</p> <p>He has requested an assessment taking in consideration the changes to the local environment as well as the amended in higher wind turbine infrastructure be undertaken.</p>		<p>Dr Owen Rhys Davies, the avifaunal specialist from Arcus Consultancy Services South Africa (Pty) Ltd ('Arcus') accompanied by Dr Glenn Moncrieff, a botanist with experience in locating and dating land cover change events in the Renosterveld, conducted an initial desk-top investigation of the area followed by a site visit.</p> <p>During the initial desk-top investigation it was estimated that approximately 364 ha of Critically Endangered Swartland Granite Renosterveld was present (in varying degrees of disturbance) on the land portions examined using remote sensing and satellite imagery.</p> <p>The site visit was conducted in mid-March 2021, where the specialists met with the landowner who outlined the land management policy and strategy of the farm portions considered and accompanied the specialists on a tour of the farms to highlight particular areas of concern. The landowner described that the natural or near-natural areas of Renosterveld were being 'opened up' through the mechanical removal of the larger bushes (such as <i>Renosterbos</i>, <i>Dicerotheramnus rhinocerotis</i>) that dominate an area and exclude smaller flowering species when the density and size of these larger bushes outcompete smaller plants for resources such as light. This thinning programme has been running for approximately 6 years and is performed on a rotational basis where areas are thinned every 5 years. While the ecological</p>

No.	Date	Comment	Initial Response	Technical response
				<p>requirements of this habitat type are understudied, this clearing activity may in some ways replicate the thinning that would naturally occur by fire in areas that have not (or cannot) be burned according to the optimal natural frequency. This practice is primarily to facilitate the growth of natural wildflowers, however the landowner has reported that a by-product of this management strategy has been an increase in raptor abundance and diversity in these areas, potentially as a result of improved foraging opportunities for rodents associated with reduced cover.</p> <p>Satellite imagery has indicated that approximately 21.9 ha was thinned between 2010 and 2015 and a further 29.7 ha between February 2018 and January 2021. While these initially do not appear to be large areas, the raptors encountered by the avifaunal specialist during the brief site visit included two Jackal Buzzards and two Steppe Buzzards, with activity concentrated over these previously thinned areas. While the time spent on site during the site visit was too short to draw any reliable conclusions from these observations, it supports the observations made by the landowner over longer periods.</p> <p>It has also been noted, during the assessment of satellite imagery that a significant amount of alien vegetation clearing has been conducted on Grootwater Farm (ongoing since 2014) and parts of the southern portions of Slangkop Farm in 2017/208, positioned adjacent and to the west of the proposed development. This has likely opened up habitats previously invaded by mostly large, woody alien species to allow for more natural, lower vegetation to grow. This may improve foraging opportunities for species such as raptors and alter their utilisation of the area.</p> <p>It is therefore recommended that pre-construction bird monitoring is added as a condition to the Amendment EA, should it be authorised. This monitoring will be used to update the existing data and inform the final design stage. The monitoring should be undertaken in line with international best practice, as well as species specific guidelines which have been developed since the original authorisation. For examples, the newer Black Harrier guidelines include increased vantage point (VP) monitoring effort to be conducted, i.e. 72 hours per VP per year, with increased effort during periods associated with higher risky flight activity as well as dedicated and appropriately timed nest surveys in order to adequately assess the potential impacts of a development in areas that may increase the risks to the species.</p>
2	10/12/2020 Email Mark Duckitt	Please acknowledge receipt of my IAP registration in the name/details below Many thanks	Good morning Mr Duckitt Thank you for your email. Please note that you have been added to the database.	N/A
3	04/01/2021 Email Keith Harrison West Coast Bird Club	Please register :- West Coast Bird Club as an IAP to the Rhebokfontein Wind Energy Facility ERM Ref, 0554699. West Coast Bird Club, - Conservation. I have attempted unsuccessfully to obtain a copy from the ERM Web.	Good morning Keith Thank you for your mail, you have been registered on the database. Please can you confirm what the issue is that you are having obtaining the document as it is working on our side.	N/A
4	15/01/2021 Email Keith Harrison West Coast Bird Club	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.	Please click on the link https://www.erm.com/rhebokfontein-eia/ and then click on "view" on the right hand side of the webpage as per the screenshot below.	<p>1. The assessment considered effects on resident bird species in Section 1.5 of the report. The assessment focusses on those priority species identified as being most at risk from potential impacts, including black harrier.</p> <p>2. These recommendations are noted.</p> <p>a) agreed b) agreed c) There will only be 2-3 small buildings on site and the difference that painting them would make would be minimal if any. However, this can be implemented should the pre-construction avifaunal monitoring recommend. d) agreed e) The client is willing to accommodate the painting of a single blade per turbine black or red (on the basis of consultation with and approval from wind turbine Original Equipment Manufacturers and the South African Civil Aviation Authority), however this could cause a visual impact, and should only be considered if deemed necessary; and The proposed mitigation and management measures for the Project are set out in section 5.2 and 7.2 of the Draft Environmental Management Programme (EMPr).</p>

No.	Date	Comment	Initial Response	Technical response
		<p>3. Vegetation:-</p> <p>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.</p> <p>b) <i>Echium plantigeum</i>, 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 a 1B, invasive plant and by law, land owners are required to remove.</p> <p>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 reseeded is necessary, seed must be sourced and recorded from originating within the Western Cape.</p>		<p>A) The Updated Terrestrial Ecology report (Appendix D) specifies the mitigation measures to be undertaken in areas that are to be rehabilitated. Since no areas of high ecological importance will be disturbed, there is no need for an off-set. Re-vegetation of disturbed/modified areas will be done using indigenous shrubs and grasses only, unless otherwise requested by landowners. The selection of species used for rehabilitation may not include any species that are not suitable to the receiving environment (i.e. may become invasive), and also no species that are indicative of habitat degradation, such as species declared as Encroaching (by CARA) or Increaser II or –III grasses.</p> <p>B)The contractor will monitor the establishment of all alien invasive species on disturbed areas and eradicate before flowering/ production of reproductive material. This includes <i>Echium plantigeum</i>.</p> <p>C) Control of the establishment of alien invasive vegetation is set out in the EMPr as prescribed in the Terrestrial Ecology report (Appendix D) and will be legally binding should the Amendment and EMPr be authorised. These measures include:</p> <p>Avoid and Minimise:</p> <ul style="list-style-type: none"> - Wheels of large machinery should be checked prior to entering the site and cleared of seed or any other plant material (especially of species with spiny or bur-like seeds) to reduce the introduction and spread of alien invasive plants. All such plant material removed must be burnt in a controlled area or otherwise destroyed. - If filling material is to be used, this should be sourced from areas free of invasive species, and alien plant control measures are to be applied to all areas used for sourcing fill materials. <p>Reduce:</p> <p>Conduct a detailed Alien Invasive Survey, and if possible also along approximately 20 -50 km of all major access routes leading to the site (along which heavy machinery is expected to be coming in). From this:</p> <ul style="list-style-type: none"> - Create and implement a suitable Alien Management Control Plan, which is also aligned to control plans by the land-owners - Destruction of regenerative material of cleared alien species by burning in a protected area is encouraged. - Be aware of alien species that may be newly introduced to the area and act immediately to eradicate such once detected – focus especially on the early eradication of Patterson’s Purse. <p>Rehabilitate:</p> <p>Rehabilitate and revegetate all areas that have been disturbed as soon as practically possible and progressively during all phases of construction, during operation and after decommissioning. This will be according to a Rehabilitation Plan that needs to be compiled and will include the following: Re-vegetation measures of disturbed/modified areas using indigenous shrubs, forbs and grasses only – unless requested otherwise (i.e. crops) by the landowner. The selection of species used for rehabilitation may not include any species that are not suitable to the receiving environment (i.e. are known to be weeds or invasive), and also no species that are indicative of habitat degradation, such as species declared as Encroaching or Increaser II or –III grasses.</p>
		<p>4. Fences:-</p> <p>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.</p> <p>Semiskilled and unskilled labour to be recruited from Darling or Mamre with 5 years proven residence or are on the voters roll.</p> <p>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.</p>		<p>It should be noted that the Project site is comprised of existing farms which have existing perimeter fencing.</p> <p>Fences will be temporarily erected within the Project site in order to prevent mammals from falling into excavated areas.</p> <p>The recruitment process will be conducted with the involvement of a local representative to ensure that local labourers are given preference.</p> <p>Vehicles can be bought and registered in the area, however at this stage it is not determined if vehicles will be bought new, second-hand or hired.</p>
		<p>5. Effect upon Bats.</p> <p>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:-</p> <ul style="list-style-type: none"> • At air temperatures below 11 degrees C. 		<p>The recommendations for this amendment EA include pre- and post-construction bat monitoring. A bat monitoring programme is recommended as part of the EMPr (section 4.2 and 7.2) during the operational phase in order to determine the extent of impacts, and to validate the success of any mitigation strategies proposed.</p>

No.	Date	Comment	Initial Response	Technical response
		<ul style="list-style-type: none"> If the rainfall for the night is more than 4mm. When the wind speed is more than 9 metres per second. 		
		<p>6. 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.</p> <p>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.</p>		<p>Recommendation on dealing with feral cats has been added to the EMPr in section 4.2.</p> <p>Given that the Project site is existing and working farms, the likelihood of gambling and poaching syndicates is low. However, the following has been added to the EMPr:</p> <ul style="list-style-type: none"> - Contact Cape Nature should there be any evidence of poaching, of wildlife. - Contact local animal welfare organisation should feral cats be seen on site.
5	29.01.2021 Email Sam Ralston BirdLife South Africa	<p>Good day</p> <p>Please see the attached comments from BirdLife South Africa.</p> <p>Thank you for the opportunity to comment on the above application.</p> <p>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 (<i>Pelecanus onocrotalus</i>, Vulnerable), Black Harrier (<i>Circus maurus</i>, Endangered and endemic), Martial Eagle (<i>Polemaetus bellicosus</i>, Endangered), African Marsh Harrier (<i>Circus ranivorus</i>, Vulnerable) and Greater Flamingo (<i>Phoenicopterus ruber</i>, Near Threatened) was more significant than initially assessed.</p> <p>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.</p> <p>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.</p> <p>Over the years, both BirdLife South Africa and CapeNature have engaged with the applicant to express our 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.</p>	<p>Good morning Sam</p> <p>Thank you for your comments, they will be incorporated into the final Report.</p>	<p>N/A</p> <p>Thank you for your response.</p> <p>We recognise the engagement that Birdlife South Africa have had over the years with various parties involved in this proposed Development and acknowledge your comments.</p> <p>The EA was granted based on an impact assessment and specialist studies that were compliant with national requirements at the time of decision making and that sufficient information was presented to the Department to make an informed decision at the time.</p> <p>In response to this comment received, The consultants from ERM and from Arcus Consultancy Services South Africa (Pty) Ltd ('Arcus') (as avifauna specialists) met with Sam from BirdLife SA on 23 March 2021 to discuss the issues raised further. It was discussed that further bird monitoring needs to take place, and mitigation measures updated accordingly.</p> <p>The applicant has committed to further bird monitoring prior to construction. ERM confirmed that the final layout and EMPr will need to be updated during the final design stage (and will include findings from the upcoming monitoring) and will be submitted to I&APs including birdlife for comment, prior to being submitted to DEFF for approval.</p>
		<p>1) Outdated data:</p> <p>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.</p>		<p>The Updated Avifaunal Report (Appendix D) recommends pre-construction monitoring is undertaken for the Project in line with latest guidelines, including flight activity surveys (Vantage Point surveys) to update the project baseline and inform operational monitoring in line with recommendations in Jenkins <i>et al</i> 2015 and surveys to identify breeding raptors. The draft EMPr has also been updated to include measures set out in the 2020 Black Harriers and Wind energy Guidance (Simmons <i>et al</i>, 2020).</p> <p>An ecological walk over was undertaken in September/October 2020 to determine whether any large scale landuse or landcover changes had occurred since the previous survey work was undertaken which would be likely to lead to a change in bird abundance or distribution across the project site or surrounding area. The survey found that habitats on the proposed project site are largely unchanged since the previous avifauna assessment was completed in 2013. A follow up survey in March 2021 identified some changes in landcover on farms around the Project site, where clearance of tree cover has opened up areas and created more open habitat.</p> <p>The proposed pre-construction monitoring will identify whether these changes to habitat outside of the Project site affect the bird activity within the Project site and will inform the adaptive management, mitigation and monitoring set out in the report.</p>
		<p>2) Impacts on Great White Pelican</p> <p>We remain concerned about the potential impacts on Great White Pelican (<i>Pelecanus onocrotalus</i>, 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.</p>		<p>We note your concerns about potential impacts on great white pelican. The responses below address your numbered comments in turn.</p> <p>The avoidance rate is one of most important variables in determining the predicted number of collisions when using the Band (Band <i>et al</i>) collision risk model. Current SNH guidance (SNH, 2018) recommends using 98% if a species specific rate isn't available (and as great white pelicans are not native to Scotland, avoidance rates have not been published for this species by SNH). Recent guidance (SNH</p>

No.	Date	Comment	Initial Response	Technical response
		<p>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.</p> <p>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?</p> <p>b) Are the Romanian site's conditions comparable to those at Rhebokfontein? For example, is the predominate type of flight (i.e. soaring, gliding or powered) the same at both sites?</p> <p>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?</p> <p>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.</p> <p>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?</p>		<p>2018, Furness, 2015) proposes higher avoidance rates for large waterbirds in the UK, for swans (99.5%), geese (99.8%) and divers (99.5%). The results of post construction monitoring of wind farms in Romania indicate that 98% applicable to great white pelicans based on calculated avoidance and the observations from carcass monitoring. The 98% avoidance rate used in the study is therefore our expert judgment based on latest guidance and operational monitoring results.</p> <p>The site features in the Hatton paper referenced lies between a pelican colony and regular feeding areas which experience regular/daily commuting activity by great white pelicans soaring between sites during the breeding season, using slope uplift to gain height so represents a very similar situation to that experienced at Rhebokfontein. The Romania site referenced is situated between the Danube delta and River, rather than at a coastal location as at Rhebokfontein but is considered to represent a very good analogy for how birds at Rhebokfontein may react to the presence of a wind farm sited along a regular commuting corridor.</p> <p>Birds at the Romanian site typically exhibited macro avoidance, by soaring high above the turbine array (Hatton pers com) rather than changing their flight/commuting route. It is envisaged that pelicans at Rhebokfontein will be able to exhibit similar avoidance using slope uplift to soar above turbines. The assessment of radar data to identify and move turbines away from the areas of highest flight activity, including removing turbines close to slope in the southeast of the Project area, was undertaken to reduce the risk of collision for birds, including by using uplift to soar above the Project.</p> <p>The assessment does recognise that the great white pelican population at Dassen Island is declining. However reasons for the decline do not appear to be linked to wind developments but rather to other factors, potentially related to food supply.</p> <p>The Part 2 assessment highlighted the fact that the predicted impact with the revised turbine layout and specifications would be less than the consented scheme, and would be an improvement on what could already be constructed under the current consent, reducing the predicted mortality without active mitigating (e.g turbine curtailment or shut down on demand) from 22 casualties to 6 casualties (taking into consideration changes to the turbine specification, layout and revised collision rate).</p> <p>The Assessment also however recognises that these impacts would still represent an impact on a priority endangered species, and the revised EMPr includes commitments to operational mitigation including seasonal or active shut down of relevant turbines, as well as a commitment to compensation measures.</p> <p>The approach to presenting the outcomes of the collision risk modelling mirrors adopted by Jenkins (2014), where a range of avoidance rates, turbine speeds and wind speeds are presented, in Table 1.12 of the report (including estimated fatality rates for these different scenarios), before identifying that, as in Jenkins, the average wind speed and average turbine parameters represent perhaps the most likely outcome.</p>
		<p>3) Impacts on Martial Eagle</p> <p>The presence of breeding Martial Eagles (<i>Polemaetus bellicosus</i>, 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?</p> <p>How likely is it that it will be reused during the lifespan of the proposed facility?</p> <p>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.</p>		<p>During the surveys to update the habitat and terrestrial biodiversity baseline undertaken in September/October 2020, the martial eagle nest was searched for, as well as interviews conducted with local communities and landowners. No sightings of martial eagle or a potential nest were recorded.</p> <p>However, the potential remains that martial eagle may breed in the vicinity of the Project, and additional mitigation measures to reduce disturbance impacts to this territory have been proposed should it still be present, as well as further surveys to confirm if martial eagle breeding territory is present and identify other sensitive breeding species. The results of these surveys will inform the final EMPr, including any buffer zones for nests of priority species identified.</p>
		<p>4) Impacts on Black Harrier</p> <p>The updated avifaunal assessment glosses over the potentially significant impacts on Black Harrier (<i>Circus maurus</i>, 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 <i>Circus ranivorus</i> (Curtis et al. 2004, ARJ pers. obs, R. E. Simmons pers. comm.). ... Black Harrier could even breed within the development area in wet years</p>		<p>Jenkins et al (2014) does provide a summary of historical records and distribution of black harrier as presented in the response from Birdlife, however the survey information from site specific surveys of the Project site presented in the same report indicate only three flights of black harrier recorded during baseline surveys, which did not present passage rates or collision risk modelling for black harrier. The Black Harrier Guidelines (presenting data from the Western Cape Biodiversity Spatial Plan (CapeNature 2017)) indicates the closest nest sites to the northwest are approximately 20 km from the proposed turbine positions, but that nest sites to the south are approximately 4 km from proposed turbine positions.</p>

No.	Date	Comment	Initial Response	Technical response
		<p>(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 not been adequately assessed or mitigated. Additional data collection and consideration of recent literature is necessary.</p>		<p>The Assessment report analysed the radar data to identify interactions with black harrier flights as recommended in Jenkins et al (2014). Only one black harrier flight was recorded, which was not a high risk flight (ie would not interact with the proposed turbine array at collision risk height). We note reference to the 2020 Black Harrier Guidelines, and survey requirements in line with the guidance are incorporated into the proposed pre-construction surveys and included in the revised draft EMPr. Mitigation and operational management measures included in the draft EMPr have also been revised in line with best practice Black Harrier Guidelines.</p>
		<p>5) Requirements operational phase mitigation are weak and ambiguous All avifaunal assessments agree that fatalities of threatened species likely to occur. Therefore, we suggest that if this project proceeds, the wind farm must proactively plan for and implement operational phase mitigation as soon as turbines begin turning (i.e. shutdown-on-demand or curtailment). This must be a condition of authorisation. We also suggest that the EMPr be amended to include a clear and unambiguous objective/outcome – i.e. zero fatalities of threatened bird species. We cannot risk a situation where there is any confusion or debate about when or how operational phase mitigation must be implemented. Way forward: In light of the above considerations, BirdLife South Africa does not support the application. While we understand that environmental authorisation for the project has been granted and renewed in the past, this does not change the fact that site is in ecologically important area (particularly for pelicans). We, therefore, urge the applicant to consider alternative locations. Should the applicant wish to proceed with developing this site, we suggest that the impact assessment and mitigation strategy must be revisited, and supported by up-to-date data collected for the site, combined with recent relevant literature on impacts on birds in South Africa. A proactive, unambiguous and enforceable mitigation strategy must be developed to ensure that impacts on threatened species are addressed throughout the lifespan of the facility. This could have significant cost implications and may affect the management of the wind farm. Therefore, it is essential that all parties understand what will be required and make provision for the worst-case scenario.</p>		<p>The draft EMPr has been revised in line with best practice guidelines, including those for black harrier. The draft EMPr now contains clearer commitments to operational management and shut down on demand and/or curtailment approaches for key species, as well as commitments to setting thresholds to trigger additional management measures, and targets for operational performance in relation to bird impacts. The final EMPr will be informed by the proposed pre-construction monitoring, including further development of thresholds to trigger additional management measures, and targets for operational performance.</p>
6	04.02.2021 Email Andrea Gibb Darling Wind Power	<p>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</p>	<p>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</p>	N/A
7	04.02.2021 Email Waseefa Dhansay Heritage Western Cape	<p>Good day Can you confirm if a Section 38 NID was submitted to HWC in order to comment? Kind regards, Waseefa Dhansay</p>	<p>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.</p>	<p>The validity of the Heritage Impact Assessment was discussed at the Adopted Resolutions and Decisions of the Meeting of the Impact Assessment Committee (IACOM) of Heritage Western Cape (HWC) on Wednesday, 10 March 2021. The Committee endorsed the documents tabled and the letter dated 16 November 2020 prepared by ACO Associates and supported the amended proposal. This letter is attached as Appendix E.</p>

No.	Date	Comment	Initial Response	Technical response
8	05.02.2021 Email John Duckitt Darling Wildflower Society	Hi I would like to continue to be regarded as an Interested and Affected Party Thanks you Kind regards John Duckitt	Good morning Mr Duckitt Thank you for your email. Please note that you have been added to the database.	N/A
9	09.02.2021 Email Gerhard Brummer Jakkalsfontein Nature Reserve Landowner	Sirs, I am an owner of Jakkalsfontein Nature Reserve. With reference to the above, please register me as an Affected Party. Regards, Dr. Gerhard Brümmer	Good morning Garhard Thank you for your email. You have been registered on the I&AP database.	N/A
10	10.02.2021 Email Butch Rice Jakkalsfontein Nature Reserve Landowner	Please register me. Full Name : Butch Rice Jakkalsfontein. Please confirm all in order. Thanks.	Good day Mr Rice Thank you for your email. You have been registered as an I&AP.	N/A
11	14.02.2021 Email Eva Orbis Jakkalsfontein Nature Reserve Landowner	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 Kind regards, Eva Orbis	Good day Ms Orbis Thank you for your email. You have been registered as an I&AP.	N/A
12	14.02.2021 Email Eva Orbis Jakkalsfontein Nature Reserve Landowner	Dear Erm, Further to having registered as an I&AP, in a separate email, I would like to strongly object to the Rhebokfontein 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. Kind regards, Eva Orbis	Thank you Ms Orbis, your comment has been noted.	The potential effects associated with the proposed Project have been assessed through various independent specialist studies. The potential impact on the environment and social receptors is presented in Chapter 8 of the amendment report. Most of the potential impacts assessed have a Minor to Negligible residual significance (once mitigation measures are put in place). The proposed amendments will result in the same residual impact as assessed during the original EIA, with the exception of flora and fauna, and geology, which has been assessed to have a reduced residual impact. There are also positive social and economic impacts associated with the Project that include income and employment benefits within the West coast region. It must be noted that there is also a high positive benefit of securing clean energy to assist in meeting South Africa's energy needs as Load shedding is set to continue for the foreseeable future.
13	16.02.2021 Email Butch Rice Jakkalsfontein Nature Reserve Landowner	Good morning Amy, Thank you for confirming my registration as an I&AP for the Rhebokfontein 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.	Good day Mr Rice Thank you for your email. Your comment has been noted and will be responded to in the comments and response report.	The Project will not hinder conservation efforts in the reserve. The specific points are addressed below.
		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.		Great White Pelican: A large proportion of the updated avifaunal study was focussed on the potential impacts to the great white pelican. The assessment does recognise that the great white pelican population at Dassen Island is declining. However reasons for the decline do not appear to be linked to wind developments but rather to other factors, potentially related to food supply. The assessment highlighted the fact that the predicted impact with the revised turbine layout and specifications would be less than the consented scheme, and would be an improvement on what could already be constructed under the current consent, reducing the predicted mortality without active mitigating (e.g turbine curtailment or shut down on demand) from 22 casualties to 6 casualties (taking into consideration changes to the turbine specification, layout and revised collision rate). The Assessment also however recognises that these impacts would still represent an impact on a priority endangered species, and the revised EMPr includes

No.	Date	Comment	Initial Response	Technical response
		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.		<p>commitments to operational mitigation including seasonal or active shut down of relevant turbines, as well as a commitment to compensation measures.</p> <p>The approach to presenting the outcomes of the collision risk modelling mirrors that adopted by Jenkins (2014) where a range of avoidance rates, turbine speeds and wind speeds are presented, in Table 1.12 of the report (including estimated fatality rates for these different scenarios), before identifying that, as in Jenkins, the average wind speed and average turbine parameters represent perhaps the most likely outcome.</p> <p>Black Harrier:</p> <p>Jenkins et al (2014) does provide a summary of historical records and distribution of black harrier as presented in the response from Birdlife, however the survey information from site specific surveys of the Project site presented in the same report indicate only three flights of black harrier recorded during baseline surveys, which did not present passage rates or collision risk modelling for black harrier. The Black Harrier Guidelines (presenting data from the Western Cape Biodiversity Spatial Plan (CapeNature 2017)) indicates the closest nest sites to the northwest are approximately 20 km from the proposed turbine positions, but that nest sites to the south are approximately 4 km from proposed turbine positions.</p> <p>The Assessment report analysed the radar data to identify interactions with black harrier flights as recommended in Jenkins et al (2014). Only one black harrier flight was recorded, which was not a high risk flight (ie would not interact with the proposed turbine array at collision risk height). We note reference to the 2020 Black Harrier Guidelines, and survey requirements in line with the guidance are incorporated into the proposed pre-construction surveys and included in the revised draft EMPr. Mitigation and operational management measures included in the draft EMPr have also been revised in line with best practice Black Harrier Guidelines.</p> <p>The draft EMPr has been revised in line with best practice guidelines, including those for black harrier. The draft EMPr now contains clearer commitments to operational management and shut down on demand and/or curtailment approaches for key species, as well as commitments to setting thresholds to trigger additional management measures, and targets for operational performance in relation to bird impacts.</p> <p>The final EMPr will be informed by the proposed pre-construction monitoring, including further development of thresholds to trigger additional management measures, and targets for operational performance.</p>
		<p>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.</p> <p>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.</p> <p>Yours faithfully, Butch Rice</p>		<p>The potential effects associated with the proposed Project have been assessed through various independent specialist studies. The potential impact on the environment and social receptors is presented in Chapter 8 of the amendment report. Most of the potential impacts assessed have a Minor to Negligible residual significance (once mitigation measures are put in place). The proposed amendments will result in the same residual impact as assessed during the original EIA, with the exception of flora and fauna, and geology, which has been assessed to have a reduced residual impact.</p> <p>There are also positive social and economic impacts associated with the Project that include income and employment benefits within the West coast region. It must be noted that there is also a high positive benefit of securing clean energy to assist in meeting South Africa's energy needs as Load shedding is set to continue for the foreseeable future.</p> <p>In terms of the proposed amendments, no increase in visibility has been identified through the updated viewshed analysis conducted as part of the visual impact Assessment Report.</p> <p>The increase in visibility occurs mainly to the northwest and southeast of the project site and at distances of greater than 5km (i.e. in middle to the background of views) and therefore most of the sensitive viewing locations (Jakkalsfontein Nature Reserve) would not be impacted upon by the amended project. In addition, the slight change in layout, the removal of two turbines, and the increase in turbine dimensions, would have a minor influence on the overall visibility of the project. Increased visibility is therefore not a significant issue in the assessment of the proposed amendments.</p>
14	16.02.2021	Hello	Good day Mr Feldon	The two turbines which were removed from the amendment layout (as approved in the original EIA layout) were found to have the highest risk to avifauna in the region and were thus removed. The draft

No.	Date	Comment	Initial Response	Technical response
	Email Walter Feldon Jakkalsfontein Nature Reserve Landowner	Kindly register me as an I&AB objector asap. Many thanks	Thank you for your mail, you have been registered as an I&AP.	EMPr has been revised in line with best avifaunal best practice guidelines. The draft EMPr now contains clearer commitments to operational management and shut down on demand and/or curtailment approaches for key species, as well as commitments to setting thresholds to trigger additional management measures, and targets for operational performance in relation to bird impacts. The final EMPr will be informed by the proposed pre-construction monitoring, including further development of thresholds to trigger additional management measures, and targets for operational performance.
15	16.02.2021 Email David Wilcock Jakkalsfontein Nature Reserve Landowner	Sirs I wish to register as an I&AP for the Rhebokfontein 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.	Good day Mr Wilcock Thank you for your email.	The potential effects associated with the proposed Project have been assessed through various independent specialist studies. The potential impact on the environment and social receptors is presented in Chapter 8 of the amendment report. Most of the potential impacts assessed have a Minor to Negligible residual significance (once mitigation measures are put in place). The proposed amendments will result in the same residual impact as assessed during the original EIA, with the exception of flora and fauna, and geology, which has been assessed to have a reduced residual impact.
		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,		The potential effects associated with the proposed Project have been assessed through various independent specialist studies. The potential impact on the environment and social receptors is presented in Chapter 8 of the amendment report. Most of the potential impacts assessed have a Minor to Negligible residual significance (once mitigation measures are put in place). The proposed amendments will result in the same residual impact as assessed during the original EIA, with the exception of flora and fauna, and geology, which has been assessed to have a reduced residual impact. There are also positive social and economic impacts associated with the Project that include income and employment benefits within the West coast region. It must be noted that there is also a high positive benefit of securing clean energy to assist in meeting South Africa's energy needs as Load shedding is set to continue for the foreseeable future. The two turbines removed from the layout were found to have the highest risk to avifauna in the region and were thus removed. The draft EMPr has been revised in line with best avifaunal best practice guidelines. The draft EMPr now contains clearer commitments to operational management and shut down on demand and/or curtailment approaches for key species, as well as commitments to setting thresholds to trigger additional management measures, and targets for operational performance in relation to bird impacts. The final EMPr will be informed by the proposed pre-construction monitoring, including further development of thresholds to trigger additional management measures, and targets for operational performance.
16	16.02.2021 Email Peter Gibbs Jakkalsfontein Nature Reserve Landowner	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 Rhebokfontein 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	Good day Mr Gibbs Thank you for your email. You have been registered on the I&AP database. You may submit your comment before 24 February 2021.	N/A
17	17.02.2021 Email David Whitelaw Cape Bird Club	Dear "Engie" Could you please register me as an InAP for this project. Regards,	Hi David Thanks for your mail, you have been added to the I&AP database.	N/A
18	17.02.2021 Email Peter Gibbs Jakkalsfontein Nature Reserve Landowner	As mentioned in your communication to Jakkalsfontein Homeowners Association on 4 February, 2021, ERM reference 0554699, certain changes are being proposed to the originally approved project on 2 February 2012 (DEA Reference 12/12/20/1582) These changes necessitate a Part Two Amendment to the EA. My name is Peter James Gibbs and I am the principal trustee of GIBBS FAMILY TRUST, the registered owner of plot, with house there-on, 104 PELICAN CLOSE, Jakkalsfontein, which is an affected party. On behalf of the trust, I object to the amendments in totality, proposed in Part Two amendment to EA.	Thank you for your comment, your objection has been recorded.	The potential effects associated with the proposed Project have been assessed through various independent specialist studies. The potential impact on the environment and social receptors is presented in Chapter 8 of the amendment report. Most of the potential impacts assessed have a Minor to Negligible residual significance (once mitigation measures are put in place). The proposed amendments will result in the same residual impact as assessed during the original EIA, with the exception of flora and fauna, and geology, which has been assessed to have a reduced residual impact.

No.	Date	Comment	Initial Response	Technical response
		<p>The original Rhebokfontein Wind Energy Facility was also objected to by the Jakkalsfontein Homeowners Association ,represented by the board of Directors, and many individual homeowners as well as other objectors.</p> <p>Despite all the valid arguments raised in the objection, regarding visual impact on the landscape, affect on bats, insects, birds, land values, nuisance etc.,the project was approved.</p>		<p>There are also positive social and economic impacts associated with the Project that include income and employment benefits within the West coast region. It must be noted that there is also a high positive benefit of securing clean energy to assist in meeting South Africa's energy needs as Load shedding is set to continue for the foreseeable future.</p> <p>Potential Noise Impacts:</p> <p>With regard to the proposed amendments, the updated noise impact assessment found that there will be no increase in the significance of the noise impact, and the recommendations as contained in the previous document will still be valid. The specialist recommends that the turbines selected should have a maximum sound power emission level less than 107.4 dBA.</p> <p>Potential Visual Impacts:</p> <p>In terms of the proposed amendments, no increase in visibility has been identified through the updated viewshed analysis conducted as part of the visual impact Assessment Report.</p> <p>The increase in visibility occurs mainly to the northwest and southeast of the project site and at distances of greater than 5km (i.e. in middle to the background of views) and therefore most of the sensitive viewing locations (Jakkalsfontein Nature Reserve) would not be impacted upon by the amended project. In addition, the slight change in layout, the removal of two turbines, and the increase in turbine dimensions, would have a minor influence on the overall visibility of the project. Increased visibility is therefore not a significant issue in the assessment of the proposed amendments.</p>
		<p>All the original arguments remain 8 years later. The overall affect is even worse with the proposed changes in that increased sizes are being proposed to, turbines, rotor diameters, hub height, output capacity, turbine footprint etc.</p> <p>Jakkalsfontein is a Nature Reserve occupied by owners who are nature lovers, interested in Nature Conservation. There are at least 100 occupied homes on the Estate with a further 7 vacant plots and a further 43 undeveloped but approved stands.</p> <p>Values of the existing properties as well as the undeveloped stands will be severely affected with a wind farm 300 metres from our boundary.</p> <p>Such a facility will be an eyesore to the landscape and affect the tranquillity of the region.</p> <p>The affect on avian wild life is incalculable.</p> <p>The inconvenience to close neighbours (Jakkalsfontein is barely 300 metres distant), with construction and supplier vehicles operating almost directly opposite our entrance, would be huge .The R27 is already congested with heavy trucks going up and down the West Coast .</p> <p>On behalf of the trust, I strongly object to all and any changes to the original project.</p> <p>Regarding the original approved project, it would be better if the development does not take place and it should be re-located to a more suitable location in line with worldwide best practices.</p> <p>Please confirm that this objection has been registered</p> <p>Many thanks</p> <p>Yours sincerely</p>		<p>Potential Impact on Wildlife:</p> <p>Terrestrial animals can be affected by temporary factors associated with the construction of wind turbines e.g. destruction of habitat, vibration and noise effects, higher direct mortality on wind farm roads. In most cases currently available for bench- marking however, the operation of wind farms was found to have no significant effects on ground-dwelling animals.</p> <p>In addition, the development is expected to have no effect on the terrestrial wildlife in or near the Jakkalsfontein Nature Reserve.</p> <p>Potential Impact on property Values:</p> <p>While the extent to which property prices may be affected depends on the proximity to the windfarm and relating views, experience from other established wind energy facilities in other parts of SA, such as Paternoster (West Coast 1), and those near St Francis Bay, Cape St Francis and Jefferies Bay in the Eastern Cape have indicated that the wind farms have had no impact on property values and also no impact on tourism / visitors coming to the area).</p> <p>Potential Impact on Avifauna:</p> <p>The two turbines removed from the layout were found to have the highest risk to avifauna in the region and were thus removed. The draft EMPr has been revised in line with best avifaunal best practice guidelines. The draft EMPr now contains clearer commitments to operational management and shut down on demand and/or curtailment approaches for key species, as well as commitments to setting thresholds to trigger additional management measures, and targets for operational performance in relation to bird impacts. The final EMPr will be informed by the proposed pre-construction monitoring, including further development of thresholds to trigger additional management measures, and targets for operational performance.</p>
19	18.02.2021 Email jbesaans	<p>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</p>	<p>Thank you for your email</p> <p>Please could you send me your full name and contact details so that I can register you on the I&AP database?</p>	<p>The two turbines removed from the layout were found to have the highest risk to avifauna in the region and were thus removed. The draft EMPr has been revised in line with best avifaunal best practice guidelines. The draft EMPr now contains clearer commitments to operational management and shut down on demand and/or curtailment approaches for key species, as well as commitments to setting thresholds to trigger additional management measures, and targets for operational performance in relation to bird impacts. The final EMPr will be informed by the proposed pre-construction monitoring, including further development of thresholds to trigger additional management measures, and targets for operational performance.</p>
20	18.02.2021 Email	<p>Good morning Amy,</p> <p>Please register me as an I&AP for the Rhebokfontein project. Use my email address as above.</p>	<p>Good morning</p>	<p>N/A</p>

No.	Date	Comment	Initial Response	Technical response
	Carrots Doyle Jakkalsfontein Nature Reserve Landowner	<p>Please confirm all is in order.</p> <p>Thank you for confirming my registration as an I&AP for the Rhebokfontein 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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Regards</p>	<p>Thank you for your email. You have been added to the I&AP database.</p> <p>Good morning Carrots</p> <p>Your comment has been recorded and will be responded to in the comments and response report.</p>	<p>The potential effects associated with the proposed Project have been assessed through various independent specialist studies. The potential impact on the environment and social receptors is presented in Chapter 8 of the amendment report. Most of the potential impacts assessed have a Minor to Negligible residual significance (once mitigation measures are put in place). The proposed amendments will result in the same residual impact as assessed during the original EIA, with the exception of flora and fauna, and geology, which has been assessed to have a reduced residual impact.</p> <p>There are also positive social and economic impacts associated with the Project that include income and employment benefits within the West coast region. It must be noted that there is also a high positive benefit of securing clean energy to assist in meeting South Africa's energy needs as Load shedding is set to continue for the foreseeable future.</p> <p>Potential Impact on Avifauna:</p> <p>The Part 2 assessment highlighted the fact that the predicted impact with the revised turbine layout and specifications would be less than the consented scheme, and would be an improvement on what could already be constructed under the current consent, reducing the predicted mortality without active mitigating. The Assessment also however recognises that these impacts would still represent an impact on a priority endangered species, and the revised EMPr includes commitments to operational mitigation including seasonal or active shut down of relevant turbines, as well as a commitment to compensation measures.</p> <p>The draft EMPr has been revised in line with best avifaunal best practice guidelines. The draft EMPr now contains clearer commitments to operational management and shut down on demand and/or curtailment approaches for key species, as well as commitments to setting thresholds to trigger additional management measures, and targets for operational performance in relation to bird impacts. The final EMPr will be informed by the proposed pre-construction monitoring, including further development of thresholds to trigger additional management measures, and targets for operational performance.</p> <p>Potential Noise Impacts:</p> <p>With regard to the proposed amendments, the updated noise impact assessment found that there will be no increase in the significance of the noise impact, and the recommendations as contained in the previous document will still be valid. The specialist recommends that the turbines selected should have a maximum sound power emission level less than 107.4 dBA.</p> <p>Potential Visual Impacts:</p> <p>In terms of the proposed amendments, no increase in visibility has been identified through the updated viewshed analysis conducted as part of the visual impact Assessment Report.</p> <p>The increase in visibility occurs mainly to the northwest and southeast of the project site and at distances of greater than 5km (i.e. in middle to the background of views) and therefore most of the sensitive viewing locations (Jakkalsfontein Nature Reserve) would not be impacted upon by the amended project. In addition, the slight change in layout, the removal of two turbines, and the increase in turbine dimensions, would have a minor influence on the overall visibility of the project. Increased visibility is therefore not a significant issue in the assessment of the proposed amendments.</p> <p>Potential Impact on Wildlife:</p> <p>Terrestrial animals can be affected by temporary factors associated with the construction of wind turbines e.g. destruction of habitat, vibration and noise effects, higher direct mortality on wind farm roads. In most cases, however, the operation of wind farms was found to have no significant effects on ground-dwelling animals.</p> <p>In addition, the development is expected to have no effect on the terrestrial wildlife in or near the Jakkalsfontein Nature Reserve.</p>
21	18.02.2021 Email Walter Feldon	<p>To whom it may concern</p> <p>As a property owner at Jakkalsfontein Nature reserve I wish to register my objection to the proposed wind farm RHEBOKSFONTEIN.</p>	<p>Good morning Wally</p>	<p>The potential effects associated with the proposed Project have been assessed through various independent specialist studies. The potential impact on the environment and social receptors is presented in Chapter 8 of the amendment report. Most of the potential impacts assessed have a Minor to Negligible residual significance (once mitigation measures are put in place). The proposed amendments</p>

No.	Date	Comment	Initial Response	Technical response
		<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	Thank you for your mail. Your comment will be responded to in the comments and response report.	<p>will result in the same residual impact as assessed during the original EIA, with the exception of flora and fauna, and geology, which has been assessed to have a reduced residual impact.</p> <p>There are also positive social and economic impacts associated with the Project that include income and employment benefits within the West coast region. It must be noted that there is also a high positive benefit of securing clean energy to assist in meeting South Africa's energy needs as Load shedding is set to continue for the foreseeable future.</p> <p>On boarding of renewable energy relates directly to the objectives of the Swartland Integrated Development Plan for 2017 – 2022.</p> <p>The Western Cape Biodiversity Spatial Plan Handbook 2017, recognises that energy generating developments (i.e. nuclear power, wind farms, etc.) are associated with large areas of land left undeveloped thereby maintaining low transformation levels relative to the property size.</p>
	18.02.2021 Email Denis Tuchten Jakkalsfontein Nature Reserve Landowner	<p>Afternoon</p> <p>Please register me as an interested and affected party, and confirm</p> <p>Denis Tuchten</p> <p>Jakkalsfontein</p>	<p>Good morning Mr Tuchten</p> <p>Thank you for your mail. You have been registered as an I&AP.</p>	N/A
22	19.02.2021 Email Denis Tuchten Jakkalsfontein Nature Reserve Landowner	<p>Sirs</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>I would appreciate confirmation of receipt of this email.</p>	Thank you for your mail Your comment has been recorded and will be responded to in the comments and response report.	<p>The potential effects associated with the proposed Project have been assessed through various independent specialist studies. The potential impact on the environment and social receptors is presented in Chapter 8 of the amendment report. Most of the potential impacts assessed have a Minor to Negligible residual significance (once mitigation measures are put in place). The proposed amendments will result in the same residual impact as assessed during the original EIA, with the exception of flora and fauna, and geology, which has been assessed to have a reduced residual impact.</p> <p>The two turbines removed from the layout were found to have the highest risk to avifauna in the region and were thus removed. The draft EMPr has been revised in line with best avifaunal best practice guidelines. The draft EMPr now contains clearer commitments to operational management and shut down on demand and/or curtailment approaches for key species, as well as commitments to setting thresholds to trigger additional management measures, and targets for operational performance in relation to bird impacts. Avifaunal impacts are covered in Section 8.4 of the amendment report and in the updated avifaunal study in Appendix D. The final EMPr will be informed by the proposed pre-construction monitoring, including further development of thresholds to trigger additional management measures, and targets for operational performance.</p> <p>There are also positive social and economic impacts associated with the Project that include income and employment benefits within the West coast region. It must be noted that there is also a high positive benefit of securing clean energy to assist in meeting South Africa's energy needs as Load shedding is set to continue for the foreseeable future.</p>
23	19.02.2021 Email Arthur James	<p>Dear Sirs</p> <p>I am a homeowner resident at Jakkalsfontein, close to the proposed windfarm development.</p> <p>May I ask that you please register my interest and keep me copied on all public communications concerning this development.</p>	<p>Good morning Mr James</p> <p>Thank you for your mail. You have been registered as an I&AP.</p>	N/A
24	19.02.2021 Email Arthur James	<p>Introduction</p> <p>Thank you for confirming my registration as an Affected Party for the above Rhebokfontein project.</p> <p>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.</p> <p>Nearby owner</p> <p>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.</p>	Thank you for your mail. Your comment has been recorded and will be responded to in the comments and response report.	<p>The potential effects associated with the proposed Project have been assessed through various independent specialist studies. The potential impact on the environment and social receptors is presented in Chapter 8 of the amendment report. Most of the potential impacts assessed have a Minor to Negligible residual significance (once mitigation measures are put in place). The proposed amendments will result in the same residual impact as assessed during the original EIA, with the exception of flora and fauna, and geology, which has been assessed to have a reduced residual impact.</p> <p>There are also positive social and economic impacts associated with the Project that include income and employment benefits within the West coast region. It must be noted that there is also a high positive benefit of securing clean energy to assist in meeting South Africa's energy needs as Load shedding is set to continue for the foreseeable future.</p> <p>Potential Noise Impacts:</p>

No.	Date	Comment	Initial Response	Technical response
		<p>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.</p>		<p>With regard to the proposed amendments, the updated noise impact assessment (Appendix D) found that there will be no increase in the significance of the noise impact, and the recommendations as contained in the previous document will still be valid. The specialist recommends that the turbines selected should have a maximum sound power emission level less than 107.4 dBA.</p> <p>Potential Visual Impacts:</p> <p>In terms of the proposed amendments, no increase in visibility has been identified through the updated viewshed analysis conducted as part of the visual impact Assessment Report.</p> <p>The increase in visibility occurs mainly to the northwest and southeast of the project site and at distances of greater than 5km (i.e. in middle to the background of views) and therefore most of the sensitive viewing locations (Jakkalsfontein Nature Reserve) would not be impacted upon by the amended project. In addition, the slight change in layout, the removal of two turbines, and the increase in turbine dimensions, would have a minor influence on the overall visibility of the project. Increased visibility is therefore not a significant issue in the assessment of the proposed amendments.</p> <p>Potential Impact on Wildlife:</p> <p>Terrestrial animals can be affected by temporary factors associated with the construction of wind turbines e.g. destruction of habitat, vibration and noise effects, higher direct mortality on wind farm roads. In most cases, however, the operation of wind farms was found to have no significant effects on ground-dwelling animals.</p> <p>In addition, the development is expected to have no effect on the terrestrial wildlife in or near the Jakkalsfontein Nature Reserve.</p>
		<p>Reduction of the local bird population</p> <p>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.</p> <p>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.</p> <p>With reference to the radar-tracking study by A. Jenkins et al (2014) included in your documentation, in which is stated:</p> <p>"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</p> <p>"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.</p> <p>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.</p> <p>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.</p> <p>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.</p>		<p>Great White Pelican:</p> <p>A large proportion of the updated avifaunal study was focussed on the potential impacts to the great white pelican. The assessment does recognise that the great white pelican population at Dassen Island is declining. However reasons for the decline do not appear to be linked to wind developments but rather to other factors, potentially related to food supply. The assessment highlighted the fact that the predicted impact with the revised turbine layout and specifications would be less than the consented scheme, and would be an improvement on what could already be constructed under the current consent, reducing the predicted mortality without active mitigating (e.g turbine curtailment or shut down on demand) from 22 casualties to 6 casualties (taking into consideration changes to the turbine specification, layout and revised collision rate). The Assessment also however recognises that these impacts would still represent an impact on a priority endangered species, and the revised EMPr includes commitments to operational mitigation including seasonal or active shut down of relevant turbines, as well as a commitment to compensation measures.</p> <p>The approach to presenting the outcomes of the collision risk modelling mirrors that adopted by Jenkins (2014) where a range of avoidance rates, turbine speeds and wind speeds are presented, in Table 1.12 of the report (including estimated fatality rates for these different scenarios), before identifying that, as in Jenkins, the average wind speed and average turbine parameters represent perhaps the most likely outcome.</p> <p>Black Harrier:</p> <p>Jenkins et al (2014) does provide a summary of historical records and distribution of black harrier as presented in the response from Birdlife, however the survey information from site specific surveys of the Project site presented in the same report indicate only three flights of black harrier recorded during baseline surveys, which did not present passage rates or collision risk modelling for black harrier. The Black Harrier Guidelines (presenting data from the Western Cape Biodiversity Spatial Plan (CapeNature 2017)) indicates the closest nest sites to the northwest are approximately 20 km from the proposed turbine positions, but that nest sites to the south are approximately 4 km from proposed turbine positions.</p> <p>The Assessment report analysed the radar data to identify interactions with black harrier flights as recommended in Jenkins et al (2014). Only one black harrier flight was recorded, which was not a high risk flight (ie would not interact with the proposed turbine array at collision risk height). We note reference to the 2020 Black Harrier Guidelines, and survey requirements in line with the guidance are</p>

No.	Date	Comment	Initial Response	Technical response
		<p>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.</p> <p>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.</p> <p>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.</p> <p>Conclusion</p> <p>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.</p> <p>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.</p> <p>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.</p>		<p>incorporated into the proposed pre-construction surveys and included in the revised draft EMPr. Mitigation and operational management measures included in the draft EMPr have also been revised in line with best practice Black Harrier Guidelines.</p> <p>The draft EMPr has been revised in line with best practice guidelines, including those for black harrier. The draft EMPr now contains clearer commitments to operational management and shut down on demand and/or curtailment approaches for key species, as well as commitments to setting thresholds to trigger additional management measures, and targets for operational performance in relation to bird impacts.</p> <p>The final EMPr will be informed by the proposed pre-construction monitoring, including further development of thresholds to trigger additional management measures, and targets for operational performance.</p> <p>In terms of the proposed amendments, no increase in visibility has been identified through the updated viewshed analysis conducted as part of the visual impact Assessment Report.</p> <p>The increase in visibility occurs mainly to the northwest and southeast of the project site and at distances of greater than 5km (i.e. in middle to the background of views) and therefore most of the sensitive viewing locations (Jakkalsfontein Nature Reserve) would not be impacted upon by the amended project. In addition, the slight change in layout, the removal of two turbines, and the increase in turbine dimensions, would have a minor influence on the overall visibility of the project. Increased visibility is therefore not a significant issue in the assessment of the proposed amendments.</p>
25	22.02.2021 Email Karel Marais Yzerfontein Resident	<p>Hi,</p> <p>I would like to register as an I&AP as an owner of property in Yzerfontein and lodge my opposition to the project.</p> <p>Thanks you</p>	<p>Good morning</p> <p>Thank you for your mail. You have been registered as an I&AP.</p>	<p>Kindly refer to the EMPr which details the management and mitigation measures that must be adhered to, in order to manage and/ or mitigate any potential impacts on the receiving environment, as identified and assessed in the EIA.</p>
26	22.02.2021 Email Elvi Elsner Yzerfontein Resident	<p>Hello,</p> <p>Please tell me how to have a say about proposed wind turbines close to Yzerfontein. Thank you.</p> <p>Kind regards</p> <p>Good morning,</p> <p>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.</p> <p>Newest technology should be considered when spending huge amounts of money.</p> <p>We need to find ways to cover our energy demand AND have the smallest environmental impact.</p> <p>Kind regards</p>	<p>Good morning</p> <p>You may simply respond to this email with your comments.</p> <p>Thank you for your comment.</p> <p>During the final design phase, the applicant will ensure that the most appropriate technology is selected for construction of this Wind farm. The exact turbine is not specified in the EIA or the amendment report in order for newest technologies to be available for selection during the final design phase.</p>	<p>N/A</p> <p>During the final design phase, the applicant will ensure that the most appropriate technology is selected for construction of this Wind farm. The exact turbine is not specified in the EIA or the amendment report in order for latest technologies available for selection to be selected during the final design phase.</p>
27	23.02.2021 Email Johann Louw	<p>Your letter dated 4 February 2021 under above heading refers.</p> <p>The Jakkalsfontein Homeowners Association, does not support- and strongly objects to the proposed amendment of the Project description for the following reason.</p> <p>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</p>	<p>Thank you for your mail. Your comment has been recorded and will be responded to in the comments and response report which will also be submitted to the competent authority</p>	<p>N/A</p>

No.	Date	Comment	Initial Response	Technical response
	Board Chairman: Jakkalsfontein Homeowners Association	<p>ecological impact arising from its location amidst an area characterised by zoned nature conservation land use / nature reserves associated with unique biodiversity.</p> <p>The Jakkalsfontein Homeowners Association who represents 107 property owners and owns the Jakkalsfontein Nature Reserve, situated less than 3 km from the planned Rhebokfontein 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:</p> <p>Document 1: 22 February 2021 – Objection to the Part Two Environmental Authorisation Amendment for the Rhebokfontein Wind Energy Facility</p> <p>Document 2: 27 July 2011 – Comment on the final Environmental Impact Assessment Report for the construction of the Rhebokfontein Windfarm project</p> <p>Document 3: 22 March 2012 – Appeal to the then Department Environmental Affairs and Tourism (DEAT)</p> <p>Document 4: June 2014 – 3D Simulation supplied by Jakkalsfontein Homeowners Association to the environmental consultant</p> <p>Kindly provide us with proof that this letter, with the four attachments included, was received by:</p> <p>1) Your office; and</p> <p>2) the reviewing officer of the National Department Environment, Forestry and Fisheries.</p>	(Department of Environment, Forestry and Fisheries).	
		<p>The Board of the Jakkalsfontein Homeowners Association (JHA) wish to register its objection to the Part Two Environmental Authorisation Amendment for the Rhebokfontein 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.</p> <p>1. The process</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>"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.</p>		<p>1. Please note that the public participation plan, which included the original commenting period dates and availability of the draft amendment report was approved by the competent authority as legally required.</p> <p>Please note that numerous home owners within the Jakkalsfontein Nature Reserve were emailed directly and were part of the original I&AP database. This list included members of the Residents Association .</p> <p>The commenting period from 10 December until 30 January excludes the days between 15 December and 5 January as legally required. The remaining days form part of the 30-day commenting period. Please also note that the commenting period was extended from 4 February until 24 February, making the commenting period over 50 days, excluding the closure period.</p> <p>Please note that due process has been followed throughout this process.</p>
		<p>2. Visual impact</p> <p>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.</p> <p>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.</p>		<p>In terms of the proposed amendments, no increase in visibility has been identified through the updated viewshed analysis conducted as part of the visual impact Assessment Report.</p> <p>The increase in visibility occurs mainly to the northwest and southeast of the project site and at distances of greater than 5km (i.e. in middle to the background of views) and therefore most of the sensitive viewing locations (Jakkalsfontein Nature Reserve) would not be impacted upon by the amended project. In addition, the slight change in layout, the removal of two turbines, and the increase in turbine dimensions, would have a minor influence on the overall visibility of the project. Increased visibility is therefore not a significant issue in the assessment of the proposed amendments.</p>

No.	Date	Comment	Initial Response	Technical response
		<p>3. Impact on flora</p> <p>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.</p> <p>There is nothing in the Report addressing areas such as these, which flows from and through the project area to the sea.</p> <p>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.</p>		<p>The impacts relating to alien invasive vegetation is assessed in the Ecology Specialist Assessment and is also presented in Chapter 8 of the amendment report. Clear mitigation measure are presented and have been included in the EMPr, which becomes legally binding once approved by competent authority. These mitigation measures include:</p> <p>Avoid and Minimise:</p> <p>Wheels of large machinery should be checked prior to entering the site and cleared of seed or any other plant material (especially of species with spiny or bur-like seeds) to reduce the introduction and spread of alien invasive plants. All such plant material removed must be burnt in a controlled area or otherwise destroyed.</p> <p>If filling material is to be used, this should be sourced from areas free of invasive species, and alien plant control measures are to be applied to all areas used for sourcing fill materials.</p> <p>Reduce:</p> <p>Conduct a detailed Alien Invasive Survey, and if possible also along approximately 20 -50 km of all major access routes leading to the site</p> <p>Rehabilitate: Rehabilitate and revegetate all areas that have been disturbed as soon as practically possible and progressively during all phases of construction, during operation and after decommissioning. This will be according to a Rehabilitation Plan that needs to be compiled and will include the following:</p> <p>Monitor:</p> <p>Monitor the establishment of alien invasive species on disturbed areas and eradicate timeously before flowering/production of reproductive material</p>
		<p>4. Avian impact assessment</p> <p>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.</p>		<p>The monitoring and mitigation measures relating to avifauna within the draft EMPr has been revised in line with best practice guidelines, including those for black harrier. The draft EMPr now contains clearer commitments to operational management and shut down on demand and/or curtailment approaches for key species, as well as commitments to setting thresholds to trigger additional management measures, and targets for operational performance in relation to bird impacts. The EMPr also ensure that pre-construction monitoring is to take place, which will inform the final design layout of the facility. The final EMPr will be informed by the proposed pre-construction monitoring, including further development of thresholds to trigger.</p>
		<p>5. Social impact assessment</p> <p>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.</p> <p>"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.</p> <p>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.</p>		<p>The project will create employment opportunities, the potential is linked to local employment opportunities, and this depends on availability of suitable qualified contractors, builders etc., specifically during the construction phase. Specific figures will be provided during the public participation for the final EMPr.</p> <p>The implementation of community trusts has been recommended by the social specialist. The applicant would need to agree to this recommendation and provide the procedure for implementation. It is not possible to provide this level detail in the Social Impact Assessment.</p> <p>Re sense of place / visual, the Social Impact Assessment does refer to comment from manager of !Kwa Tuu, Mr Daiber, Mr Duckitt from the Rondeburch Private Nature Reserve, and owner of Alexanderfontein Farm, Mr Nicolaas Basson. These comments have been used in updating the 'sense of place' and visual aspects of the project.</p> <p>In terms of the landscape of the Project area; the proximity of the site to the various nature reserves has been included in the revised report.</p> <p>The potential for property values to be impacted on depends on the wind turbines location relative to individual houses and also views etc. The social impact specialist makes reference here to the nearby wind farms where there has been no impact of property values, nor on tourism in the area. These include Paternoster (West Coast 1 WEF), and various WEFs near St Francis Bay, Cape St Francis and Jefferies Bay in the Eastern Cape.</p>

No.	Date	Comment	Initial Response	Technical response
		<p>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).</p> <p>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&Aps 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&Aps, either via email or posting them on a website.</p> <p>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&Aps. 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 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.</p>		<p>Thank you and noted. Construction and operational monitoring reports will be compiled according to the legislated format and will adhere to official guidelines available at the time. Such reports will be submitted to the relevant compliance and monitoring government department. In addition, the client will make an effort to release reports that will be made available to registered I&Aps, likely via email.</p> <p>Both the ecologist and the social specialist went to site during 2020 to validate information before completing their specialist study updates. Dr Owen Rhys Davies, the avifaunal specialist from Arcus Consultancy Services South Africa (Pty) Ltd ('Arcus') accompanied by Dr Glenn Moncrieff, a botanist with experience in locating and dating land cover change events in the Renosterveld, conducted an initial desk-top investigation of the area followed by a site visit during January 2021. These site visits were used to update report data where necessary and to inform any further monitoring that should take place in order to inform the final design layout and EMP. The noise impact study did not require further literature review, hence the reference list was not updated. All of the specialists appointed to provide inputs to the amendment are independent of the applicant and the EAP (ERM), and as required in terms of the EIA Regulations, 2014, include a signed declaration of independence. I&Aps are entitled to appoint their own specialists to undertake 3rd party review of the specialist studies if they wish. Peer reviews are "necessary" only when there is a direct or indirect link (gain) e.g. when an engineering company do both the EIA and engineering work. In this case, Zutari are the engineers, ENGIE (as proponent) provide the information and we are 100% full independent so see no need for Peer Review It is the opinion of ERM that the specialist studies are written in such a way that should be clear to I&Aps. ERM as the EAP have summarised their findings and mitigation measures in the Impact Assessment Chapter of the amendment report.</p>
28	22.02.2021 Email Ray van der Merwe	<p>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.</p>	<p>Good morning Thank you for your mail. You have been registered on the I&AP database.</p>	N/A
29	22.02.2021 Email David Rudd	<p>Good day I wish to register as an I&AP I should be grateful if you would include me in all correspondence. Kind regards</p>	<p>Good morning David and Marie Thank you for your mail. You have been registered on the I&AP database.</p>	N/A
30	22.02.2021 Email Lizanne Hetherington	<p>Hi, Please register me as an I&AP for the Rhebokfontein Wind Energy Facility as described in https://www.erm.com/rhebokfontein-eia</p>	<p>Good morning Ms Hetherington Thank you for your mail. You have been registered on the I&AP database.</p>	N/A

No.	Date	Comment	Initial Response	Technical response
		Yzerfontein Resident Thanks,		
31	23.02.2021 Email Thys Pretorius	<p>To whom it may concern.</p> <p>I Mathys Andries Pretorius herewith request to be registered as an I&AP on the Rhebokfontein Wind Energy Facility (DEA Reference: 12/12/20/1582).</p> <p>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.</p> <p>The Yzerfontein community as a highly impacted stakeholder is specifically excluded by the limited availability at the following public locations:</p> <ol style="list-style-type: none"> 1. Darling Public Library 2. Swartland Municipal Office, 46 Main Road, Yzerfontein 3. ERM Website: www.erm.com/rhebokfontein-eia <p>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.</p> <p>Regards.</p>	<p>Good day Mr Pretorius</p> <p>Thank you for your mail. You have been added to the I&AP database. Your comment is also noted and will be responded to in the comments and response report.</p> <p>Please note that the public participation plan, which included the original commenting period dates and availability of the draft amendment report was approved by the competent authority as legally required.</p> <p>The commenting period from 10 December until 30 January excludes the days between 15 December and 5 January as legally required. The remaining days form part of the 30-day commenting period. Please also note that the commenting period was extended from 4 February until 24 February, making the commenting period over 50 days, excluding the closure period.</p> <p>Please note that due process thus has been followed throughout this process.</p>	<p>Please note that the public participation plan, which included the original commenting period dates and availability of the draft amendment report was approved by the competent authority as legally required.</p> <p>The commenting period from 10 December until 30 January excludes the days between 15 December and 5 January as legally required. The remaining days form part of the 30-day commenting period. Please also note that the commenting period was extended from 4 February until 24 February, making the commenting period over 50 days, excluding the closure period.</p> <p>Please note that due process thus has been followed throughout this process.</p>
32	23.02.2021 Email Gerhard Brummer	<p>Introduction</p> <p>Thank you for confirming my registration as an Affected Party for the above Rhebokfontein 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.</p> <p><i>Nearby owner</i></p> <p>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.</p> <p><i>Wind turbines are prone to noise disturbances</i></p> <p>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.</p> <p><i>Reduction of the local bird population</i></p> <p>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.</p> <p>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-</p>	<p>Thank you for your mail. Your comment will be responded to in the comments and response report.</p>	<p>The potential effects associated with the proposed Project have been assessed through various independent specialist studies. The potential impact on the environment and social receptors is presented in Chapter 8 of the amendment report. The proposed amendments will result in a lesser impact to flora and fauna than that of the already authorised facility. There is no reason to believe that the proposed wind farm amendments will have a negative impact on the conservation management at the Jakkalsfontein Nature Reserve.</p> <p>With regard to the proposed amendments, the updated noise impact assessment found that there will be no increase in the significance of the noise impact, and the recommendations as contained in the previous document will still be valid. The specialist recommends that the turbines selected should have a maximum sound power emission level less than 107.4 dBA.</p> <p>Great White Pelican:</p> <p>A large proportion of the updated avifaunal study was focussed on the potential impacts to the great white pelican. The assessment does recognise that the great white pelican population at Dassen Island is declining. However reasons for the decline do not appear to be linked to wind developments but rather to other factors, potentially related to food supply. The assessment highlighted the fact that the predicted impact with the revised turbine layout and specifications would be less than the consented scheme, and would be an improvement on what could already be constructed under the current consent, reducing the predicted mortality without active mitigating (e.g turbine curtailment or shut down on demand) from 22 casualties to 6 casualties (taking into consideration changes to the turbine</p>

No.	Date	Comment	Initial Response	Technical response
		<p>breaking to see them caught up between enormous Wind turbine blades desperately trying to avoid certain death.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>		<p>specification, layout and revised collision rate). The Assessment also however recognises that these impacts would still represent an impact on a priority endangered species, and the revised EMPr includes commitments to operational mitigation including seasonal or active shut down of relevant turbines, as well as a commitment to compensation measures.</p> <p>The approach to presenting the outcomes of the collision risk modelling mirrors that adopted by Jenkins (2014) where a range of avoidance rates, turbine speeds and wind speeds are presented, in Table 1.12 of the report (including estimated fatality rates for these different scenarios), before identifying that, as in Jenkins, the average wind speed and average turbine parameters represent perhaps the most likely outcome.</p> <p>Black Harrier:</p> <p>Jenkins et al (2014) does provide a summary of historical records and distribution of black harrier as presented in the response from Birdlife, however the survey information from site specific surveys of the Project site presented in the same report indicate only three flights of black harrier recorded during baseline surveys, which did not present passage rates or collision risk modelling for black harrier. The Black Harrier Guidelines (presenting data from the Western Cape Biodiversity Spatial Plan (CapeNature 2017)) indicates the closest nest sites to the northwest are approximately 20 km from the proposed turbine positions, but that nest sites to the south are approximately 4 km from proposed turbine positions.</p> <p>The Assessment report analysed the radar data to identify interactions with black harrier flights as recommended in Jenkins et al (2014). Only one black harrier flight was recorded, which was not a high risk flight (ie would not interact with the proposed turbine array at collision risk height). We note reference to the 2020 Black Harrier Guidelines, and survey requirements in line with the guidance are incorporated into the proposed pre-construction surveys and included in the revised draft EMPr. Mitigation and operational management measures included in the draft EMPr have also been revised in line with best practice Black Harrier Guidelines.</p> <p>The draft EMPr has been revised in line with best practice guidelines, including those for black harrier. The draft EMPr now contains clearer commitments to operational management and shut down on demand and/or curtailment approaches for key species, as well as commitments to setting thresholds to trigger additional management measures, and targets for operational performance in relation to bird impacts.</p> <p>The final EMPr will be informed by the proposed pre-construction monitoring, including further development of thresholds to trigger additional management measures, and targets for operational performance.</p>
		<p><i>Wind turbines have a visual impact</i></p> <p>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.</p> <p>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.</p>		<p>In terms of the proposed amendments, no increase in visibility has been identified through the updated viewshed analysis conducted as part of the visual impact Assessment Report.</p> <p>The increase in visibility occurs mainly to the northwest and southeast of the project site and at distances of greater than 5km (i.e. in middle to the background of views) and therefore most of the sensitive viewing locations (Jakkalsfontein Nature Reserve) would not be impacted upon by the amended project. In addition, the slight change in layout, the removal of two turbines, and the increase in turbine dimensions, would have a minor influence on the overall visibility of the project. Increased visibility is therefore not a significant issue in the assessment of the proposed amendments.</p>
		<p><i>Conclusion</i></p> <p>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.</p> <p>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.</p>		<p>The potential effects associated with the proposed Project have been assessed through various independent specialist studies. The potential impact on the environment and social receptors is presented in Chapter 8 of the amendment report. Most of the potential impacts assessed have a Minor to Negligible residual significance (once mitigation measures are put in place). The proposed amendments will result in the same residual impact as assessed during the original EIA, with the exception of flora and fauna, and geology, which has been assessed to have a reduced residual impact.</p> <p>There are also positive social and economic impacts associated with the Project that include income and employment benefits within the West coast region. It must be noted that there is also a high positive benefit of securing clean energy to assist in meeting South Africa's energy needs as Load shedding is set to continue for the foreseeable future.</p>

No.	Date	Comment	Initial Response	Technical response
33	23/02/2021 Email Andre Gibbs	<p>Good day Amy</p> <p>We would like to submit the following comments on the proposed Rheboksfontein Wind Farm: ENERTRAG South Africa (Pty) Ltd acquired the operational Darling Wind Farm in 2018. The facility reached commercial operation in May 2008 and consists of four 1.3MW Fuhrländer FL 1250/62 turbines with a rotor diameter of 50m and a hub height of 62m. Darling Wind Power (Pty) Ltd is also planning to expand the existing facility by constructing two new larger wind turbines to replace the existing wind turbines, which will be decommissioned once the new wind turbines are operational. As the existing Darling Wind Farm is located upwind from and in close proximity to the proposed Rheboksfontein Wind Energy Facility (WEF), we request that the assessment process for the Part 2 Amendment investigate the potential wake effect loss on the existing Darling Wind Farm, to ensure that all impacts, including the socio-economic factors, are considered, investigated, assessed and suitably mitigated. Recent appeals upheld by the Minster (Bayview - 14 October 2019 and Boulders – 30 August 2020) have found that the wake effect of a proposed WEF on an existing WEF is a relevant factor that should be considered by the Department during the decision making process.</p> <p>We acknowledge that the wake loss assessment would be based on several assumptions at this point and that the results may not conclusively indicate the extent of wake loss on the Darling Wind Farm. We therefore request that if the initial wake assessment undertaken to inform the Part 2 Amendment reveals that the proposed Rheboksfontein WEF will impact on the Darling Wind Farm, that a condition be included in the Amended Environmental Authorisation requiring that a detailed Wake Assessment be undertaken once final layouts and turbine models have been selected, so that a Wake Loss Compensation Agreement can be entered into prior to the start of construction.</p> <p>Please can you kindly also share a kmz/shapefile of Rheboksfontein Wind Energy Facility layout.</p>	<p>Good day Mrs Gibbs</p> <p>Thank you for your mail. Your comment will be responded to in the comments and response report.</p>	<p>ERM held a meeting with ENERTRAG and ENGIE on 12 March 2021 to discuss the potential implications for the Darling Wind Farm. It was agreed that ENGIE and ENERTRAG would enter into further discussions once the detailed design stage is reached and that an independent (third party) would be contracted to undertake the Wake Effect Assessment. This will be a more effective approach as the results will be more accurate and conclusive once the detailed facility layout has been finalised</p>
34	24.02.2021 Email Arthur James	<p>Dear Amy</p> <p>Thank you for confirming my registration as an I&AP for the Rheboksfontein project.</p> <p>Please note my objection to the extension of the EA, as well as the increase in the height of the turbines.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>Thank you for your mail. Your comment has been recorded and will be responded to in the comments and response report.</p>	<p>The potential effects associated with the proposed Project have been assessed through various independent specialist studies. The potential impact on the environment and social receptors is presented in Chapter 8 of the amendment report. Most of the potential impacts assessed have a Minor to Negligible residual significance (once mitigation measures are put in place). The proposed amendments will result in the same residual impact as assessed during the original EIA, with the exception of flora and fauna, and geology, which has been assessed to have a reduced residual impact.</p> <p>There are also positive social and economic impacts associated with the Project that include income and employment benefits within the West coast region. It must be noted that there is also a high positive benefit of securing clean energy to assist in meeting South Africa's energy needs as Load shedding is set to continue for the foreseeable future.</p> <p>It is important to note that the updated draft EMPr stipulates further pre-construction monitoring prior to the final design stage and final approval of the EMPr by DEFF. During this process, the final layout and EMPr will be released for further public participation.</p> <p>In terms of the proposed amendments, no increase in visibility has been identified through the updated viewshed analysis conducted as part of the visual impact Assessment Report.</p> <p>The increase in visibility occurs mainly to the northwest and southeast of the project site and at distances of greater than 5km (i.e. in middle to the background of views) and therefore most of the sensitive viewing locations (Jakkalsfontein Nature Reserve) would not be impacted upon by the amended project. In addition, the slight change in layout, the removal of two turbines, and the increase in turbine dimensions, would have a minor influence on the overall visibility of the project. Increased visibility is therefore not a significant issue in the assessment of the proposed amendments.</p> <p>There are also positive social and economic impacts associated with the Project that include income and employment benefits within the West coast region. It must be noted that there is also a high positive benefit of securing clean energy to assist in meeting South Africa's energy needs as Load shedding is set to continue for the foreseeable future.</p> <p>Potential Impact on Avifauna:</p> <p>The Part 2 assessment highlighted the fact that the predicted impact with the revised turbine layout and specifications would be less than the consented scheme, and would be an improvement on what could already be constructed under the current consent, reducing the predicted mortality without active</p>

No.	Date	Comment	Initial Response	Technical response
		<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>		<p>mitigating. The Assessment also however recognises that these impacts would still represent an impact on a priority endangered species, and the revised EMPr includes commitments to operational mitigation including seasonal or active shut down of relevant turbines, as well as a commitment to compensation measures.</p> <p>The draft EMPr has been revised in line with best avifaunal best practice guidelines. The draft EMPr now contains clearer commitments to operational management and shut down on demand and/or curtailment approaches for key species, as well as commitments to setting thresholds to trigger additional management measures, and targets for operational performance in relation to bird impacts. The final EMPr will be informed by the proposed pre-construction monitoring, including further development of thresholds to trigger additional management measures, and targets for operational performance.</p>
		<p>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.</p> <p>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.</p>		<p>In terms of the proposed amendments, no increase in visibility has been identified through the updated viewshed analysis conducted as part of the visual impact Assessment Report.</p> <p>The increase in visibility occurs mainly to the northwest and southeast of the project site and at distances of greater than 5km (i.e. in middle to the background of views) and therefore most of the sensitive viewing locations (Jakkalsfontein Nature Reserve) would not be impacted upon by the amended project. In addition, the slight change in layout, the removal of two turbines, and the increase in turbine dimensions, would have a minor influence on the overall visibility of the project. Increased visibility is therefore not a significant issue in the assessment of the proposed amendments.</p>
35	24/02/2021 Email Gerhard Gerber Department Of Environmental Affairs And Development Planning (DEADP)	<p>The proposed amendments to the project proponents are described in the Draft Amendment Report but are not quantified in terms of the area of impact.</p> <p>1.1.1. The turbine footprint will increase from the original size of 15m x 15m, i.e. 225m² per turbine, to the larger footprint of 25m x 25m, i.e. 625m² per turbine. The number of wind turbines has been reduced from 35 to 33. This means that the total development footprint of the 35 wind turbines was 7 875m² and that the total footprint of the reduced number of 33 turbines (calculated as 33 x 625m²) is 20 625m². The total development footprint has therefore increased by 12 750m² for the turbines alone. The laydown area has increased from 1 600m² to 3 250m², thus increasing the footprint of this component by 1 650m².</p> <p>1.1.2. The letter dated 04 August 2020 from the geologist (Outeniqua Geotechnical Services) states that the reduction in the number of turbines will contribute positively to direct and cumulative impacts on soil degradation. This statement is questionable as the area of impact (soil disturbance) for the reduced number of turbines has increased substantially, as detailed in paragraph 1.1.1. above.</p> <p>1.1.3. The length and location of the access roads between the turbines is not indicated on a layout, nor is the location of the laydown area or temporary construction area associated with each turbine. For example, the position of turbines numbered 31 and 30 are located on either side of a large area of Critically Endangered Swartland Granite Renosterveld vegetation as shown in Figure 4-10 of the Terrestrial Ecology Verification Assessment of Turbine Positions Report prepared by ERM dated 26 November 2020, with no indication on the maps provided where the access road will be located. This specialist report does however state that turbine positions are not located within this habitat, and that the access roads will consist of upgraded existing tracks (section 4.6, pages 30 and 31). Existing tracks could however be single, overgrown farm tracks that have re-established indigenous vegetation, and further clarity is sought in this regard.</p>	Thank you for your mail Your comment has been recorded and will be responded to in the comments and response report.	<p>1.1.1 This is correct.</p> <p>1.1.2. The first statement in the updated letter regarding the positive contribution of a reduction of turbines should be read in isolation (i.e. assuming turbine footprints remain the same size). The second comment relates to changes in the size of the turbines and footprints, and it is the specialist's opinion that the increased size of the turbines (although this is significant in itself) has no significant additional impact over those raised in the assessment report, i.e. the mitigating measures and geotechnical constraints raised in the original report are still valid.</p> <p>1.1.3 The updated layout maps have been included in the revised amendment report and Appendix G. Existing tracks are proposed to be used wherever feasible. Short sections of new roads are proposed where no existing roads occur. The roads between turbine location 30 and 31 for example follow existing tracks, with short sections between the tracks and the individual turbines, avoiding the CE Swartland Granite Renosterveld vegetation. The final layout including proposed roads will be submitted to DEFF along with the final EMPr once the final design stage is complete for approval, after they have gone through a public participation process. The terrestrial specialist has confirmed that existing tracks are not overgrown at this stage.</p>
		<p>1.2. It is recommended that the "Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Section 24(5) (a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation ("the Protocols") as published in Government Gazette1 be commented on in terms of relevance to the specialists assessments that have addressed the proposed changes in various addenda or letters that were commissioned during 2020. For example, the Terrestrial Ecology Verification Assessment of Turbine Positions Report dated 26 November 2020 includes the application of the Screening Tool to inform the</p>		Thank you for picking up this referencing error. This has been rectified and the report now refers to the correct figures and sections.

No.	Date	Comment	Initial Response	Technical response
		review of the proposed changes to the project scope. (This report however, contains "Error! Reference source not found" in various places, which should be corrected.)		
		1.3. The Avifauna Verification and Assessment Update Report prepared by ERM dated 01 December 2020 refers. This Directorate understands that mitigation measures have been applied to remove the two wind turbines considered to have had the greatest impact on the Dassen Island great white pelicans. However, concern is expressed regarding the growing cumulative impacts (as reported on) to the population of the regionally important pelican population.		<p>The assessment does recognise that the great white pelican population at Dassen Island is declining. However reasons for the decline do not appear to be linked to wind developments but rather to other factors, potentially related to food supply.</p> <p>The Part 2 assessment highlighted the fact that the predicted impact with the revised turbine layout and specifications would be less than the consented scheme, and would be an improvement on what could already be constructed under the current consent, reducing the predicted mortality without active mitigating (e.g turbine curtailment or shut down on demand) from 22 casualties to 6 casualties (taking into consideration changes to the turbine specification, layout and revised collision rate).</p> <p>The Assessment also however recognises that these impacts would still represent an impact on a priority endangered species, and the revised EMPr includes commitments to operational mitigation including seasonal or active shut down of relevant turbines, as well as a commitment to compensation measures.</p>
		1.4. The Ecological Assessment prepared by David Hoare dated 20 September 2010 recommended that a monitoring programme be implemented to document the effect of the WEF operation on bats, and that this should take place before construction (to provide a benchmark), during construction, and during operation. There is no indication that bat monitoring has taken place since this specialist report was compiled in 2010, and no reference has been made to these mammals in the Terrestrial Ecology Verification Assessment of Turbine Positions Report dated 26 November 2020. The Ecological Assessment dated September 2010 highlighted the importance of ensuring that the planning of the final infrastructure position need to avoid impacts on untransformed habitats and watercourse areas.		The EAP has recommended additional pre-construction monitoring on the proposed development area for both birds and bats be conducted in accordance with the latest applicable best practice guidelines to assess the impacts of the amendment. This pre-construction monitoring is to take place during 2022 and will feed into the final design phase and final EMPr mitigation measures. This final design and layout will be submitted to DEFF for approval prior to construction.
		1.5. This Directorate notes that the Draft Amendment Report (section 4.3) states that the final layout, which will include roads, substations, overhead powerlines and all other proposed infrastructure will be discussed with landowners and submitted to DEFF prior to construction for approval, and the process will include overlaying the biodiversity information and landowners' input to produce the most appropriate layout. This Directorate wishes to express its concern that there is no draft layout included in the Draft Amendment Report for review by interested and affected parties ("I&APs") to facilitate the assessment of all the impacts associated with the proposed amendments to the EA.		<p>The updated layout maps have been included in the revised amendment report and Appendix G. Existing tracks are proposed to be used wherever feasible. Short sections of new roads are proposed where no existing roads occur.</p> <p>It is advised, that since the final design stage has not commenced for this Project, that the final layout is submitted to DEFF prior to construction as per the existing EA. This should also include submitting the layout for comments to registered I&APs prior to submission to DEFF.</p>
		1.6. Further to the above, please refer to the Appeal EA issued by the Ministry of Water and Environmental Affairs dated 26 November 2012 which states that the applicant must submit the final layout and the Environmental Management Programme ("EMPr") for the WEF to registered I&APs to comment on, before it is submitted to the DEFF for approval.		It is advised, that since the final design stage has not commenced for this Project, that the final layout and EMPr is submitted to DEFF prior to construction as per the existing EA. This should also include submitting the layout to registered I&APs prior to submission to DEFF.
		<p>1.7. It is unclear how the conclusion was reached that no listed activities are triggered in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") Environmental Impact Assessment ("EIA"), without an indication of the project's footprint on the receiving environment.</p> <p>1.7.1. For example, the development of a road wider than 4m with a reserve of less than 13.5m outside urban areas containing indigenous vegetation, triggers Activity 4 of Listing Notice 3. Similarly, the widening of a road by more than 4m, or the lengthening of a road by more than 1km, in all areas outside urban areas containing indigenous vegetation, trigger Activity 18 of Listing Notice 3 of the NEMA EIA Regulations, 2014 (as amended). It is noted that permanent internal roads would require a minimum width of 6m, up to 13m width during the construction phase.</p> <p>1.7.2. The original EA dated 02 February 2012 authorised Item 15 of Listing Notice 1 of the 2006 NEMA EIA Regulations, being the construction of a road that is wider than 4m or that has a reserve wider than 6m, excluding access roads of less than 30m long. The threshold has however changed in the NEMA EIA Regulations, 2014 (as amended) to include "areas of indigenous vegetation", which could be located within a planned stretch of road less than 30m in length.</p> <p>1.7.3. It is unknown if access over or through watercourses will be required. If so, consideration would be required for the applicability of Activity 19 of Listing Notice 1 of the NEMA EIA Regulations, 2014 (as amended) for the infilling or depositing of any material of more than 10m³ into, or the removal or moving of material of more than 10m³ from a watercourse. The original EA dated 02 February 2012 authorised Item 1(m) of Listing Notice 1 of the 2006 NEMA EIA Regulations for the construction of facilities or</p>		<p>The relevant legal section of the draft amendment report has been updated to align previously authorised listed activities (EIA Regulations, 2006) with those in the EIA regulation 2014, as amended. While the proposed amendment itself does not trigger any listed activities, Activity 19 has been added to this amendment application given the possibility of triggering the threshold limit of a 10m³ volume of material relative to watercourses within the project area.</p> <p><i>19. The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse;</i> <i>but excluding where such infilling, depositing, dredging, excavation, removal or moving—</i> <i>(a) will occur behind a development setback;</i> <i>(b) is for maintenance purposes undertaken in accordance with a maintenance management plan;</i> <i>(c) falls within the ambit of activity 21 in this Notice, in which case that activity applies;</i> <i>d) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or</i> <i>(e) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies</i></p>

No.	Date	Comment	Initial Response	Technical response
		<p>infrastructure in the 1:10 year floodline, or within 32m from the watercourse, but the authorisation did not include a 10m³ volume of material deposited into or removed from a watercourse.</p> <p>1.8. Compliance with regulation 32(1)(a)(iv) of the NEMA EIA Regulations, 2014 (as amended) regarding any changes to the EMPr:</p> <p>1.8.1. Condition 14 of the EA dated 02 February 2012 states that various management plans are required to be included in the EMPr amendment, such as a plant rescue and protection plan, open space management plan, etc. Comment is required whether this condition has been complied with.</p> <p>1.8.2. The project description in the EMPr includes the incorrect number of turbines as 35, and the powerline linking the WEF to the Dassenberg substation in Atlantis, which is no longer part of the amendment application, as it was authorised separately.</p>		<p>1.8.1 Condition 13, 14 and 15 relating to the EMPr are still relevant to the Project and should be included in the amended EA. The EMPr is to be submitted to the department prior to construction for written approval. The EMPr submitted as part of this amendment application is not final as avifaunal monitoring still needs to take place, and the final layout of infrastructure still needs to be approved by the department. The EMPr submitted as part of this amendment application remains a dynamic document which will be further amended as information is obtained (e.g. avifaunal monitoring) to inform the final layout of infrastructure, which will be subject to approval by the department.</p> <p>This EMPr will include</p> <ul style="list-style-type: none"> - The updated mitigation measures relating to findings from the pre-construction avifaunal monitoring - A plant rescue and protection plan which allows for the maximum transplant of conservation important species from areas to be transformed. This plan must be compiled by a vegetation specialist familiar with the site in consultation with the ECO and be implemented prior to commencement of the construction phase. - An open space management plan to be implemented during the construction and operation of the facility. - A vegetation and habitat rehabilitation plan to be implemented during the construction and operation of the facility. Restoration must be undertaken as soon as possible after completion of construction activities to reduce the amount of habitat converted at any one time and to speed up the recovery to natural habitats - An alien invasive management plan to be implemented during, construction and operation of the facility. The plan must include mitigation measures to reduce the invasion of alien species and ensure that the continuous monitoring and removal of alien species is undertaken. - A storm water management plan to be implemented during the construction and operation of the facility. The plan must ensure compliance with applicable regulations and prevent off-site migration of contaminated storm water or increased soil erosion. The plan must include the construction of appropriate design measures that allow surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows. Drainage measures must promote the dissipation of storm water run-off. - An effective monitoring system to detect any leakage or spillage of all hazardous substances during their transportation handling use and storage. This must include precautionary measures to limit the possibility of oil and other toxic liquids from entering the soil or storm water systems. - An erosion management plan for monitoring and rehabilitating erosion events associated with the facility. Appropriate erosion mitigation must form part of this plan to prevent and reduce the risk of any potential erosion. - A transportation plan for the transport of turbine components, main assembly cranes and other large pieces of equipment. - A traffic management plan for the site roads to ensure that no hazards would result from the increased truck traffic and that traffic flow would not be adversely impacted. This plan must include measures to minimize impacts on local commuters - An avifauna and bat monitoring programme to document the effect of the operation of the energy facility on avifauna and bats. This must be compiled by a qualified specialist. - An environmental sensitivity map indicating environmental sensitive areas and features identified during the EIA process. - Measures to protect hydrological features such as streams, rivers, pans, wetlands. Dams and their catchments, and other environmental sensitive areas from the direct or indirect spillage of pollutants. <p>Thank you, this has been amended accordingly in the EMPr.</p>
		<p>1.8.3. The DEFF's comments dated 29 January 2021 on the Draft Amendment Report states that the specialists that conducted the various specialist studies during the original EIA application are required to confirm that no new impacts will arise from the proposed amendments and to provide comment. It is noted that the updated terrestrial ecology and avifaunal reviews were conducted by in-house specialists of ERM, and are not the same specialists that conducted the 2010 Ecological Impact Assessment, 2011</p>		<p>Attempt was made to utilise the same specialists where feasible, however given the length of time between the original studies and now this is not always practical. The Geological, Heritage, Noise, Social, and Palaeontological studies were undertaken by the same companies as the original studies. The Flora, Avian, Fauna, and Visual Impact Assessments were undertaken by suitably qualified professionals and have signed declarations of independence.</p>

No.	Date	Comment	Initial Response	Technical response
		<p>Faunal and Wetland Impact Assessment, or the 2010 Avifaunal Impact Assessment, although the original and subsequent research by AVISENSE Consulting was referenced for the updated avifaunal assessment.</p> <p>1.8.4. The Avifauna Verification and Assessment Update Report dated 01 December 2020 does not appear to have been prepared by a South African Council for Natural Scientific Professions registered avifaunal specialist, as per the requirements of the Protocol for the specialist assessment and minimum report content requirements for impacts on avifaunal species associated with the development of onshore wind energy generation facilities onshore wind energy generation facilities where the electricity output is 20 megawatts or more in GN No. 320 dated 20 March 2020.</p> <p>1.9. Please update Table 2-3, page 4 of the Draft Amendment Report and section 3.2 of the EMPr to accurately record that LOGIS conducted the Amendment: Comparative Viewshed Analysis and Visual Assessment Report dated November 2018, and not Newton Landscape Architects cc.</p>		<p>Appointment and commencement of the avifauna specialist study update for this project occurred on 8 April 2020, with the proposal being submitted on 7 February 2020.</p> <p>Therefore appointment and commissioning of the above-mentioned avifaunal specialist study update process took place prior to the implementation date (09 May 2020) of the gazetted specialist protocols (GNR 320, 20 March 2020). The specialist study has therefore been undertaken in accordance with Appendix 6 of the 2014 EIA Regulations, as amended.</p> <p>This has been corrected in both the EMPr and the Amendment Report.</p>
		<p>2. Directorate: Waste Management - Mr Gary Arendse (Gary.Arendse@westerncape.gov.za):</p> <p>2.1. The EMPr must indicate that areas for emergency refuelling of vehicles must be bunded and contain spill kits in case of accidental oil/fuel spills occurring.</p> <p>2.2. Please amend the EMPr to indicate that any event resulting in the spill or leak of hydrocarbons (e.g. petrol, diesel or oil) or any other hazardous solvents into the ground and/or water resources must be reported to all relevant authorities, including the Directorate: Pollution and Chemicals Management of this Department. This requirement in terms of section 30 of the NEMA that pertains to the control of incidents should include the reporting, containment and clean-up procedure of such incident, and the remediation of the affected area. All necessary documentation must be completed and submitted to the relevant authorities within the prescribed timeframes.</p>		<p>Thank you, this requirement has been included in the EMPr.</p>
		<p>3. Directorate: Air Quality Management - Mr Sibusiso Sinuka (Sibusiso.Sinuka@westerncape.gov.za):</p> <p>3.1. It is noted that the potential dust impacts have been adequately addressed in the EMPr. Appropriate dust suppression methods must be strictly implemented as per the EMPr.</p> <p>3.2. Dust generated during various phases of the proposed WEF must comply with National Dust Control Regulations (GN No. R. 827 of 1 November 2013) promulgated in terms of National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004).</p> <p>3.3. This Directorate acknowledges that:</p> <p>3.3.1. Per the correspondence of Enviro-Acoustic Research cc dated 28 October 2020, the proposed amendments will not increase the significance of the noise impact;</p> <p>3.3.2. Adequate noise mitigation measures have been provided in the EMPr; and</p> <p>3.3.3. The turbines have not been placed close to any noise sensitive areas.</p> <p>3.4. Please amend the Amendment Report and EMPr to indicate that noise generated during the various phases of the WEF must also comply with the Western Cape Noise Control Regulations in Provincial Notice 200/2013.</p>		<p>Dust generated during will comply with National Dust Control Regulations (GN No. R. 827 of 1 November 2013) promulgated in terms of National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004).</p> <p>Compliance with the Western Cape Noise Control Regulations in Provincial Notice 200/2013 has been added to the EMPr and the Amendment Report.</p>
		<p>4. Directorate: Development Facilitation - Ms Adri La Meyer (Adri.Lameyer@westerncape.gov.za):</p> <p>4.1. It is noted that turbine locations 32 and 33 will be removed as part of the amendment application. It is not clear how the 35 turbine locations presented in Figure 4-1 of the Draft Amendment Report have been amended since the original layout presented in the initial EIA application. The Draft Amendment Report further fails to provide an updated layout which excludes turbine locations 32 and 33. The EAP is further advised that conditions 35 – 40 of the original EA dated 02 February 2012 refer to specific turbine locations, which may have changed with the numerous amendments to the EA.</p> <p>4.2. Per paragraphs 1.5. and 4.1. above, an amended layout plan which excludes turbines 32 and 33 must be provided to registered I&APs. The layout plan must superimpose the proposed wind turbines and associated structures and infrastructure of the WEF on the environmental sensitivities of the authorised site, indicating any areas that should be avoided, including buffers. This includes the wetlands and riparian areas identified in Figures 4-9 and 4-10 of the Terrestrial Ecology Verification Assessment of Turbine Positions Report. Ideally, a combined site sensitivity map, indicating all areas of very high and high sensitivity and no-go areas identified by the various specialists, should have been provided.</p>		<p>4.1 All figures show the original turbine location numbers and do not show location 32 and 33.. Conditions 35 – 40 refer to the original layout, which was amended by the applicant in 2012. These conditions are thus no longer relevant.</p> <p>The layout maps have been updated as presented in the revised draft report and Appendix G.</p>

No.	Date	Comment	Initial Response	Technical response
		<p>4.3. Should approval be granted for the proposed amendments, then it is recommended that the competent authority replace the existing EA (and subsequent amendments) with an updated EA, as allowed for in regulation 27(2)(b) of NEMA EIA Regulations, 2014 (as amended). This will allow for an updated project description, exclusion of any contradictory and/or outdated conditions from the EA, inclusion of additional specialists' recommendations in the EA, and identification of similarly listed, approved activities in terms of the Listing Notices of both the 2006 and 2014 NEMA EIA Regulations.</p> <p>4.4. Table 3-1 indicates that a waste management licence ("WML") in terms of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) is required. The EA issued on 02 February 2012 and amendments thereto however do not indicate that a WML is required. Based on available information, it appears that the statement in Table 3-1 is incorrect and that no WML would be required for the proposed WEF and associated infrastructure.</p> <p>4.5. Please correct the statement in section 8.3.3, page 31 of the Draft Amendment Report referring to the direct and indirect negative impacts during all phases of the mine.</p> <p>4.6. Page 4 of the EMPr must be amended to indicate the reduction in the number of wind turbines proposed, i.e. "Up to 35 33 wind turbine units."</p> <p>4.7. The EMPr must be updated to reflect the most recent and relevant legislative requirements. For example, the objective related to appropriate handling and management of hazardous substances and waste states that "It must be ensured that volumes of any hazardous waste stored on site do not exceed 30m³. Should this volume be exceeded, a waste license will be required to be obtained." Note that this threshold has changed and that the storage of hazardous waste exceeding 80m³, excluding the temporary storage or storage of hazardous waste in lagoons, would require adherence to the National Norms and Standards for the Storage of Waste published in GN No. 926 of 29 November 2013 (and not a WML).</p> <p>4.8. All additional recommendations or mitigation measures proposed in the various updated specialist reports must be included in the EMPr. The following noteworthy mitigation measure of the Avifauna Verification and Assessment Update Report has not been included in the EMPr: "If potential eagle nests are identified within 3 km of the Project site, artificial nest platforms should be established at suitable alternative sites in suitable habitat outside 3 km to encourage birds to move away from the Project."</p> <p>5. The applicant is reminded of its "general duty of care towards the environment" as prescribed in section 28 of the NEMA, 1998 which states that "Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment."</p> <p>6. Please direct any enquiries to the official/s indicated in this correspondence should you require any clarity on any of the comments provided.</p> <p>7. The Department reserves the right to revise initial comments and request further information based on any information received.</p>		<p>4.3 The issuance of a new EA related to this proposed amendment, is preferable to exclude any contradictory conditions.</p> <p>4.4 Thank you, this I noted. Corrections have been made to the Amendment report in Section 3.</p> <p>4.5 Thank you for picking up this error. It has been corrected accordingly.</p> <p>4.6 Noted. This addition has been made.</p> <p>4.7 This has been updated accordingly to read: <i>It must be ensured that volumes of any hazardous waste stored on site do not exceed 80m³. Should this volume be exceeded, adherence to the National Norms and Standards for the Storage of Waste published in GN No. 926 of 29 November 2013 would be required.</i></p> <p>4.8 All mitigations measures have been added to the updated EMPr.</p> <p>5. Noted and thank you for your comments.</p>
36	29.01.2021 Email Sabelo Malaza Chief Director: integrated Environmental Authorisations Department of Environmental Affairs (DEFF)	<p>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.</p> <p>The application for amendment of the EA addresses the following:</p> <p>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:</p> <ul style="list-style-type: none"> • 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 are: from 40m x 40m to 50m x 65m; ▪ Removal of the restriction of a steel tower; and 	<p>Good Day</p> <p>Thank you, received.</p>	<p>i. This summary is correct.</p> <p>ii. There are no amendments being applied for in terms of the grid connection and associated infrastructure. The EA includes internal roads linking the turbines and other infrastructure to the site. The roads traversing the turbines have shifted marginally within the original project scope area to accommodate the new turbine positions. These are depicted in the updated layout maps provided by the proponents consulting engineers, Zutari (refer to the report and as appendix G).</p>

No.	Date	Comment	Initial Response	Technical response
		<ul style="list-style-type: none"> Increased turbine footprint: from 15m x15m to 25m x 25m. <p>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.</p> <p>ii. There are no amendments being applied for in terms of the grid connection and associated infrastructure related to the original EA.</p>		
		<p>The Department has the following comments on the abovementioned application.</p> <p>a. Please ensure that the following information as a minimum in terms of Regulation 32(1)(a) of the EIA Regulations, 2014:</p> <ul style="list-style-type: none"> 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. <p>b. Please ensure that you submit the Layout Plan as authorised with the EA, as well as the Layout Plan for the proposed amendments.</p> <p>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.</p>		<p>a. The draft amendment report and EMPr meets these requirements.</p> <p>b. These maps are attached as Appendix G.</p> <p>c. This motivation is found in Section 5.4 of the amendment report.</p>
		<p>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 EA Regulations, 2014 as amended;</p> <p>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;</p> <p>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,</p> <p>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</p> <p>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;</p> <p>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.</p> <p>j. The requirements of the acknowledgement letter 18 January 2021 must also be fulfilled.</p> <p>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.</p> <p>l. You are also advised to comply with the requirements of the Regulations 32 of the EIA Regulations 2014, as amended.</p>		<p>d. As stated in the Draft amendment report in Section 3.2, the changes alone do not constitute a listed or specified activity in terms of the EA Regulations, 2014 as amended.</p> <p>e. The list of I&APs is provided in Appendix F</p> <p>f. All comments received have been attached in Appendix F.</p> <p>g. All comments raised have been responded to in this comments and response report and have been addressed in the Amendment report. Changes to the amendment report are underlined, for ease of reference.</p> <p>h. All comments received have been adequately responded to.</p> <p>i. All comments received have been adequately responded to.</p> <p>j. The requirements of the acknowledgment letter have been fulfilled.</p> <p>k. Where practicable, engagement with the original specialist team members was undertaken to meet this request, fully acknowledging the need for continuity. The Geological, Heritage, Noise, Social, and Palaeontological studies were undertaken by the same companies as the original studies. The Flora, Avian, Fauna, and Visual Impact Assessments were undertaken by suitably qualified professionals and have signed declarations of independence.</p> <p>l. The requirements of the Regulations 32 of the EIA Regulations 2014, as amended have been complied with</p>
		<p>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.</p>		<p>Thank you for your comments. The relevant timeframes as prescribed in the appropriate Regulations have been noted.</p>
37	06.04.2021 Stephanie-Anne Barnardt	CASE NUMBER: 15031602GT0317E	Good morning Stephanie Thanks for this,	The endorsement of the Heritage Specialist Impact Statement by ACO Associates and the Committee is noted.

No.	Date	Comment	Initial Response	Technical response
	Email Heritage Western Cape	<p>The matter above has reference. This matter was discussed at the Impact Assessment Committee (IACom) meeting held on 10 March 2021.</p> <p>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 Rhebokfontein WEF Part Two EA Amendment Application.</p> <p>FINAL COMMENTS:</p> <p>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.</p> <p>Colette M Scheermeyer Acting Chief Executive Officer</p>		

Comments and Responses: Revised Draft Report

No.	Date	Comment	Initial Response	Technical response
38	16.04.2021 Email Lizell Stroh SA Civil Aviation Authority	<p>Good day, please follow the SACAA procedure on amendments as per the CAA website. http://www.caa.co.za/Pages/Obstacles/Urgent-notices.aspx</p> <p>Obstacle Notice 4/2020 Amending Obstacle Information</p> <p>Kindly note that with immediate effect, assessments will be conducted on the obstacle information as it stands in the application as provided to the Obstacle Inspectorate.</p> <p>Should applicants wish to amend the information in an application, applicants will be required to resubmit a new application which will be subject to the fees as published in Part 187.</p> <p>Please also note that obstacle assessments will be conducted on obstacles applications only after payment in full has been received and confirmed by our finance office.</p>	Thank you for your comment	This application does not fall within the bounds of the EA applications.
39	23.04.2021 Email Municipal Manager Swartland Municipality	<p>Your correspondence dated 15 April 2021 regarding the subject refers.</p> <p>A land use approval for a consent use for renewable energy structures was approved by Swartland Municipality on the subject properties on 15 August 2013 in terms of the Land Use Planning Ordinance, Ordinance 15 of 1985.</p> <p>Planning legislation in South Africa changed on 1 July 2015 when the Spatial Planning and Land Use Management Act, Act 16 of 2013 came into effect. Also, since then, the Land Use Planning Act; Act 3 of 2014 and the Municipal Land Use Planning By-law (PG 8226 of 25 March 2020) came into effect.</p> <p>The consent use approval issued by Swartland Municipality on 15 August 2013 was only valid for a period of 5 years from 1 July 2015. As the validity period of the land use approval was not extended before 1 July 2020, the land use approval lapsed.</p> <p>Please note that a land use application need to be made in terms of Section 25(2) of the Swartland Municipality: Municipal Land Use Planning By-law (PG 8226 of 25 March 2020) in order to obtain land use rights for the renewable energy structures.</p>	Thank you for your comment	This application does not fall within the bounds of the EA applications.
40	12.05.2021 Email Butch Rice Jakkalsfontein Nature Reserve Landowner	<p>Good morning,</p> <p>As a registered I&AP for the Rhebokfontein 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, which will have a significant visual impact on Jakkalsfontein, a private nature reserve neighbouring the proposed development.</p> <p>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.</p> <p>Having perused the updated documents, I note, with concern, that there has been no mitigation of the visual impact, as contained in the original proposal. Not only will this be extremely unsightly, particularly to homeowners in Jakkalsfontein, but it will also have a negative impact on the value of our properties, due to visual pollution.</p> <p>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 will still poses to local red-listed bird species, particularly the Great White Pelicans. Although the impact on avifauna has been mitigated, it still remains. 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.</p> <p>I would appreciate confirmation of receipt of this mail, and registration as an objection to the proposal of extension of authorisation, as well as objecting to the proposed increase in the height of the wind turbines.</p>	<p>Good day Mr Butch Rice,</p> <p>Thank you for your response. Your objections have been recorded and duly noted.</p>	<p>The proposed hub height increase is 10m not 32m.</p> <p>This assessments relates to the impacts associated with the proposed amendments, and not with the proposed Project itself. As stated in the EA Amendment report as well as the Visual Impact Assessment, the sensitive receptors such as Jakkalsfontein Nature Reserve will not be impacted by the amendments proposed.</p> <p>As described in the EA amendment Report, the Terrestrial Assessment and the draft CRR, wildlife may be temporarily affected, during construction, however; the operation of wind farms was found to have no significant effects on ground-dwelling animals on site or in the surrounding areas. There is no reason to believe that the development and proposed amendments will influence the wildlife or nature of the Jakkalsfontein Nature Reserves.</p> <p>While the extent to which property prices may be affected depends on the proximity to the windfarm and relating views, experience from other established wind energy facilities in other parts of SA, such as Paternoster (West Coast 1), and those near St Francis Bay, Cape St Francis and Jefferies Bay in the Eastern Cape have indicated that the wind farms have had no impact on property values and also no impact on tourism / visitors coming to the area).</p> <p>The two turbines removed from the layout were found to have the highest risk to avifauna in the region and were thus removed. The draft EMPr has been revised in line with best avifaunal best practice guidelines. The draft EMPr now contains clearer commitments to operational management and shut down on demand and/or curtailment approaches for key species, as well as commitments to setting thresholds to trigger additional management measures, and targets for operational performance in relation to bird impacts. The final EMPr will be informed by the proposed pre-construction monitoring, including further development of thresholds to trigger additional management measures, and targets for operational performance.</p>

No.	Date	Comment	Initial Response	Technical response
41	12.05.2021 Email Nicolaas Basson/ Nicolaas Hanekom	<p>Comments on the revised draft report for the Rheboksfontein Wind Energy Project Part Two Amendment dated 15 April 2021.</p> <p>I refer to our site visit and meeting with Mr Schalk van der Merwe on Alexanderfontein 19 January 2021. At this meeting, I, the managing director of Alexanderfontein Boerdery (Pty) Ltd, Mr Nicolaas Basson, indicated that I am prepared to live with the WEF, providing that 2 specific problematic wind turbine locations are either relocated or the turbines are removed. The relevant two turbines (locations 34 and 35, Figure 4.1) are located within 1.2 km and 900 m respectively of the newly established entertainment facility. The outcomes of the meeting were assessed and addressed in the revised report. According to the maps included in Appendix G, turbines 34 and 35 was not removed or relocated. The following recommendations were made in the Social Impact Assessment Rheboksfontein Wind Energy Facility Amendment Western Cape Province, January 2021 by Tony Barbour and Schalk van der Merwe.</p> <p>"Recommendations</p> <p>The establishment of the proposed Amended Rheboksfontein WEF is supported by the findings of the SIA. However, consideration should be given to relocating turbine 34 and 35 in order reduce the visual impact on the newly established entertainment facility on Alexanderfontein Farm".</p> <p>As indicated in the report, turbine 34 and 35 should be relocated. The specialist recommended that the applicants meet with the affected landowners to discuss the possibility of relocating wind turbines 34 and 35 that has the highest potential visual impact. As indicated above, turbine 34 and 35 should be relocated. In terms of the Rheboksfontein Wind Energy Facility Part Two Amendment: Revised Avifauna Verification and Assessment Update, Peter Wright, 15 April 2021 the impact of the management program for around 400 ha of small parcels of veld as currently followed, mainly with the aim of reversing historic Renosterbos encroachment, thus clearing up space for the previously suppressed geophytes to flower, was considered in the revised assessment. The change in habitat over recent years has resulted in more diverse and more abundant bird life and biodiversity on the property.</p> <p>However, no recommendations were made to remove or relocate turbines 34 and 35. The following conclusions and results were recorded in the report.</p> <p>"The majority of martial eagle flight activity (14 flights) occurred to the south of the Project site where turbines 32 and 33 were located close to slopes supporting more natural habitat and higher vegetation that may have provided suitable foraging areas for martial eagle. These turbine positions have been removed from the revised Project".</p> <p>The revised avifauna assessment in table A.I (Total At Risk Great White Pelican Flights Per Breeding Season) recorded for turbine 34 (61 — number of high risk flights) and 35 (349 — number of high risk flights) which is significantly higher risk than all the others.</p> <p>Turbines 32 and 33 were removed from the proposed development as they were located close to slopes supporting more natural habitat and higher vegetation that may have provided suitable foraging areas for martial eagle. Turbines 34 and 35 is also located close to slopes supporting more natural habitat and higher vegetation that may have provided suitable foraging areas for martial eagle. A significant portion of the management program for around 400 ha of small parcels of veld as currently followed is located on these slopes in close proximity to turbines 34 and 35.</p> <p>In conclusion I am prepared to live with the WEF, providing 2 specific problematic locations are addressed (turbines scrapped or relocated). The relevant two turbines (locations 34 and 35) would be located in significant proximity (1.2 km and 900 m, respectively) from the entertainment facility, prominently exposed as a result of slope, and directly within the primary viewshed from the client entertainment facility.</p> <p>Considering the recommendations made in the socio-economic study, as well as similar habitat which resulted in the removal of turbines 32 and 33 from the revised layout exists close to turbines 34 and 35. Also the fact that a significant higher Total At Risk Great White Pelican Flights Per Breeding Season predicted at turbines 34 and 35, we recommend that a risk adverse approach be followed.</p> <p>The recommendations made by the socio economic specialist that "the applicants meet with the affected landowners to discuss the possibility relocating wind turbines that have the highest potential visual impact. As indicated above, turbine 34 and 35 should be relocated' or that turbines 34 and 35 be removed from the revised layout is therefore requested.</p>	<p>Good morning Mr Hanekom</p> <p>Thank you kindly for your comments.</p>	<p>Avifauna</p> <p>The avifaunal Assessment did not highlight Turbines 34 and 35 as being sensitive for bird life, and thus the avifaunal specialist did not agree with the recommendation to remove turbines 34 and 45.</p> <p>Visual</p> <p>The Visual specialist also assessed the significance of turbines 34 and 35 on Mr Basson's newly constructed entertainment facility. This was responded to as the first comment and response in this CRR. This response is summarised below:</p> <p>The proposed amendments would slightly increase the visibility of the project and its visual exposure. These changes, however, would have a minor negative effect when compared to the approved facility. A low magnitude and significance of the impact associated with the change in the visual characteristics of the study area is predicted.</p> <p>In conclusion, the position of the two turbines in question (34 and 35) has not changed with the latest amendments. The stakeholder constructed the entertainment area between May and August 2020, and was at the time aware of the authorised positons of the proposed wind farms.</p> <p>It is for these reasons above that the recommendation from the social specialist has not been upheld in the EA Amendment Report.</p>

No.	Date	Comment	Initial Response	Technical response
42	14.05.2021 Email Steyn Marais Manager: Jakkalsfontein Nature Reserve	<p>ERM Team, With reference to your e mail below, please see response of the Board Chairman of the Jakkalsfontein Homeowners Association attached.</p> <p>The Board of the Jakkalsfontein Homeowners Association (JHA) took notice of the revised draft report prepared after objections were raised. We appreciate the efforts to attend to our concerns. However, Section 8.7, on visual impacts, remains unchanged.</p> <p>We wish to reiterate that for the last 10 years this was a key element of our objections to this development. Even though the amended draft report keeps its assessment of impacts at "moderate to high significance" levels, no changes are proposed. We therefore repeat our objections raised in our document dated 22 February 2021:</p> <p>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.</p> <p>We trust that this objection would remain a serious consideration in your deliberations.</p>	<p>Thank you kindly for your comments. They have been received and recorded.</p>	<p>This assessments relates to the impacts associated with the proposed amendment application. As stated in the EA Amendment report as well as the Visual Impact Assessment, the sensitive receptors such as Jakkalsfontein Nature Reserve will not be impacted by the amendments proposed.</p> <p>Visual representation was provided for in the original Visual Assessment dated 2011.</p> <p>As the proposed amendments will not have insignificant visual impacts on social receptors less than 5km from the proposed development, 3D models are not considered necessary. The visual impact will be that of the already authorised development.</p>
43	14.05.2021 Email Eva Orbis Jakkalsfontein Nature Reserve Landowner	<p>To whom it may concern;</p> <p>As a registered I&AP for the Rhebokfontein 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, which will have a significant visual impact on Jakkalsfontein, a private nature reserve neighbouring the proposed development.</p> <p>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.</p> <p>Having perused the updated documents, I note, with concern, that there has been no mitigation of the visual impact, as contained in the original proposal. Not only will this be extremely unsightly, particularly to homeowners in Jakkalsfontein, but it will also have a negative impact on the value of our properties, due to visual pollution.</p> <p>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 will still poses to local red-listed bird species, particularly the Great White Pelicans. Although the impact on avifauna has been mitigated, it still remains. 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.</p> <p>I would appreciate confirmation of receipt of this mail, and registration as an objection to the proposal of extension of authorisation, as well as objecting to the proposed increase in the height of the wind turbines.</p>	<p>Good day Eva Thank you for your comment. It has been received and recorded.</p>	<p>As stated in the EA Amendment report as well as the Visual Impact Assessment, the sensitive receptors such as Jakkalsfontein Nature Reserve will not be impacted by the amendments proposed.</p> <p>As described in the EA amendment Report, the Terrestrial Assessment and the draft CRR, wildlife may be temporarily affected, during construction, however; the operation of wind farms was found to have no significant effects on ground-dwelling animals on site or in the surrounding areas. There is no reason to believe that the development and proposed amendments will influence the wildlife or nature of the Jakkalsfontein Nature Reserves.</p> <p>While the extent to which property prices may be affected depends on the proximity to the windfarm and relating views, experience from other established wind energy facilities in other parts of SA, such as Paternoster (West Coast 1), and those near St Francis Bay, Cape St Francis and Jefferies Bay in the Eastern Cape have indicated that the wind farms have had no impact on property values and also no impact on tourism / visitors coming to the area).</p> <p>The two turbines removed from the layout were found to have the highest risk to avifauna in the region and were thus removed. The draft EMPr has been revised in line with best avifaunal best practice guidelines. The draft EMPr now contains clearer commitments to operational management and shut down on demand and/or curtailment approaches for key species, as well as commitments to setting thresholds to trigger additional management measures, and targets for operational performance in relation to bird impacts. The final EMPr will be informed by the proposed pre-construction monitoring, including further development of thresholds to trigger additional management measures, and targets for operational performance.</p>
44	17.05.2021 Email Wesley J Fisher Western Cape Strategic Planning & Knowledge Management	<p>Dear ERM South Africa</p> <p>Herewith find our written confirmation that nil commentary will be submitted by our department.</p> <p>Sent on behalf of the WCG Department of Community Safety's senior management.</p>	<p>Noted, thank you</p>	<p>N/A</p>

No.	Date	Comment	Initial Response	Technical response
45	17.05.2021 EMAIL Gerhard Gerber Chief Director: Development Planning Department of Environmental Affairs & Development Planning	<p>The Part Two Amendment Draft Report dated 09 December 2020, the Department's comments thereto dated 24 February 2021 and the e-mail notification of 16 April 2021 informing interested and affected parties of the availability of a Revised Draft Amendment Report, refer.</p> <p>Thank you for the opportunity to participate in the amendment application process for the proposed amendments to the environmental authorisation ("EA") for the Rhebokfontein wind energy facility. Please find attached collated comments from various directorates in the Department on the Part Two Amendment Revised Draft Report (hereinafter referred to as the "Revised Draft Amendment Report") dated 15 April 2021 that was available for download from the website of the environmental assessment practitioner ("EAP").</p>	Good morning Gerhard, thank you for your comments.	N/A
		<p>Draft Report (hereinafter referred to as the "Revised Draft Amendment Report") dated 15 April 2021 that was available for download from the website of the environmental assessment practitioner ("EAP").</p> <p>1. Directorate: Development Management (Region 1) – Mr Bernard Kgosana/ Ms K. Adriaanse (Bernard.Kgosana@westerncape.gov.za / Keagan-Leigh.Adriaanse@westerncape.gov.za):</p> <p>1.1. This Directorate notes that the similarly listed activities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") Environmental Impact Assessment ("EIA"), Regulations, 2014 (as amended) have been included in the Revised Draft Amendment Report. This Directorate further notes that no new listed activities in terms of the NEMA EIA Regulations, 2014 (as amended) have been identified as a result of the proposed amendments.</p> <p>1.2. This Directorate notes that a Screening Tool Report (generated from the National Web Based Environmental Screening Tool) has not been provided. This Directorate advises that a Screening Tool Report should be included in the Final Amendment Report to be submitted to the competent authority for decision-making.</p> <p>1.3. In addition, a Site Sensitivity Verification Report (required in terms of the "Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Section 24(5) (a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation") has not been included in the Revised Draft Amendment Report. A Site Sensitivity Verification Report which confirms or disputes the current land use and environmental sensitivities as identified by the Screening Tool, should be included in the Final Amendment Report to be submitted to the competent authority.</p> <p>1.4. This Directorate notes that Figure 4-4 of the Revised Draft Amendment Report provides the road network overlain by ecological sensitivity. This Directorate further notes that new roads fall within areas of low ecological sensitivity.</p> <p>1.5. The Revised Avifaunal Verification and Assessment Update compiled by ERM dated 15 April 2021 indicates that the assessment is a draft report. The final specialist report must be included in the Final Amendment Report to be submitted to the competent authority.</p> <p>1.6. The additional mitigation measures for the potential avifaunal impacts are supported and must be strictly implemented.</p>		<p>1.1 Noted that listed activities are listed as such.</p> <p>1.2 A screening tool will be attached to the final submission to DEFF</p> <p>1.3 Site sensitivity report will be attached to the final submission to DEFF</p> <p>1.4 Noted</p> <p>1.5 The final report will be submitted during the final submission to DEFF</p> <p>1.6 Noted, these measures have been included in the EMP</p>
		<p>2. Directorate: Waste Management - Mr Gary Arendse (Gary.Arendse@westerncape.gov.za):</p> <p>2.1. This Directorate notes that its previous comments on the Part Two Amendment Draft Report have been responded to in the Comments and Response Report ("C&RR") (Appendix F6) and incorporated in the EMPr. This Directorate has no further comments on the Revised Draft Amendment Report.</p>		Noted that all comments have been responded to.
		<p>3. Directorate: Air Quality Management - Mr Sibusiso Sinuka (Sibusiso.Sinuka@westerncape.gov.za):</p> <p>3.1. This Directorate has reviewed the Revised Draft Amendment Report and notes that the EAP has addressed all previous comments in the C&RR and incorporated responses in the Revised Draft Amendment Report and EMPr. Please however note that the EMPr must explicitly indicate that the generation of dust must comply with the National Dust Control Regulations (Government Notice No. R. 827 of 1 November 2013) promulgated in terms of National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004).</p>		Noted that all comments have been responded to.
	4. Directorate: Development Facilitation - Ms Adri La Meyer (Adri.LaMeyer@westerncape.gov.za):			

No.	Date	Comment	Initial Response	Technical response
		<p>4.1. This Directorate notes that its comments on the Part Two Amendment Draft Report have been responded to in the C&RR and incorporated in the Revised Draft Amendment Report and EMPr. It is further noted that an updated layout plan superimposing the proposed wind turbines and associated structures and infrastructure on the environmental sensitivities have been included as Figure 4-4 of the Revised Draft Amendment Report.</p> <p>4.2. This Directorate reiterates for the attention of the competent authority that should approval be granted for the proposed amendments, that it is recommended that the competent authority replaces the existing EA (and subsequent amendments) with an updated EA.</p> <p>5. The applicant is reminded of its "general duty of care towards the environment" as prescribed in section 28 of the NEMA, 1998 which states that "Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment."</p> <p>6. Please direct any enquiries via e-mail to the official/s indicated in this correspondence should you require any clarity on any of the comments provided.</p> <p>7. The Department reserves the right to revise or withdraw comments and request further information based on any information received.</p>		<p>Thank you for your comments and noted.</p>
46	17.05.2021 Email Andrea Gibb Darling Wind Power	<p>Good day Amy</p> <p>Thank you for providing us with the opportunity to comment on the Revised Draft Amendment Report. We acknowledge that our previous comments have been captured and responded to in the Comments and Response Report. We also note that the EMPr does mention that a Wake Effect Assessment should be undertaken by a mutually agreed third party accepted by ENGIE, MOYENG ENERGY and ENERTRAG. We are in agreement with these statement but request that the following also be added to the EMPr prior to submitting the Final Amendment Report to DEFF for decision making:</p> <ul style="list-style-type: none"> • Third party to be accepted by ENGIE, MOYENG ENERGY, DARLING WIND POWER and ENERTRAG SOUTH AFRICA. • Should the Wake Impact Assessment conclude that the Rhebokfontein Wind Energy Facility will impact the existing Darling Wind Farm, a Wake Loss Compensation Agreement must be entered into prior to the start of construction. 	<p>Good morning Andrea</p> <p>Thank you kindly for your comment. It will be captured and responded to in the CRR.</p>	<p>The EMPr has been amended as such.</p> <p>Based on the level of impact, if any, identified in the independent wake impact assessment during detail design stage, discussions between Moyeng Energy and Enertrag will take place regarding a Wake Loss Compensation Agreement.</p>
	18.05.2021 Email Email Sabelo Malaza Chief Director: integrated Environmental Authorisations Department of Environmental Affairs (DEFF)	<p>The Environmental Authorisation (EA) for the above-mentioned project dated 25 September 2019, the application for amendment of the EA and the revised draft amendment report received by the Department on 16 July 2020, the acknowledgement letter dated 23 July 2020, the Department's comments on the draft amendment reports dated 29 January 2021 and the amended draft amendment reports received by the Department on 16 April 2021 refer.</p> <p>The Department has the following comments on the abovementioned amendment application</p> <p>Specific Comments</p> <p>(i) Please ensure that the application form must include and describe the detailed amendments that are being applied for. When doing so, please quote the page number of the EA, the condition/section affected, the existing information (if necessary) and what is the required amendment/inclusion.</p> <p>For example:</p> <p style="padding-left: 40px;">Page 3 of the EA, point 6 of the Specific Conditions stated as:</p> <p style="padding-left: 80px;">6. The 100m buffer from the road shall be maintained</p> <p style="padding-left: 40px;">Is requested to be amended to:</p> <p style="padding-left: 80px;">6. The 150m buffer from the road and nearby dam shall be maintained.</p> <p>Note that if detailed amendments are not requested clearly in the application form, they will not appear in the decision for e.g amendments to the EMPr or layout map.</p> <p>(ii) The EAP is to ensure that all the amendments applied for do not trigger any listed or specified activity as outlined in Regulation 31 of the EIA Regulations, 2014 as amended. Ensure that there is clear motivation to</p>		<p>The application form submitted along with the Final Amendment Report includes detailed changes that should be made to the new EA.</p>

No.	Date	Comment	Initial Response	Technical response
		<p>the proposed amendments occurring within the approved footprint of the existing authorisation (can be supported with a layout map).</p> <p>Public participation</p> <p>(i) From the information presented in the amended draft amendment report, it is noted that there are concerns and objections from the interested and Affected Parties (I&APs), specifically concerns from Birdlife South Africa with regards to, inter-alia, impact on the avifauna Birdlife suggested that the impact assessment and mitigation strategy be revisited, and supported by up-to-date data collected for the site combined with recent relevant literature on impacts on birds in South Africa.</p> <p>You are required to adequately address these concerns and any other objections with regards to the proposed amendment. The recommendations to be presented in the final amendment reports must meet both the applicant's requirements as well as addressing objections raised by I&APs, (including the landowners).</p> <p>(ii) Please ensure that comments from all relevant stakeholders are submitted to the Department with the final report. This includes but is not limited to the Western Cape Department of Environmental Affairs and Development Planning (DEA:DP), the South African Heritage Resources Agency (SAHRA), BirdLife SA, and this Department's Biodiversity and Conservation Directorate. A Comments and Response trail report (C&R) must be submitted with the final report. The C&R report must incorporate all comments for this application. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Appendix 1 of this comments letter. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as "noted" is not regarded as an adequate response to I&AP's comments.</p> <p>(iii) Please ensure that all issues raised and comments received during the circulation of the draft amendment report from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final report. Proof of correspondence with the various stakeholders must be included in the final amendment report. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014 as amended.</p> <p>(iv) The final amendment report must also indicate that this draft amendment report has been subjected to a public participation process.</p> <p>Layout & Sensitivity Maps</p> <p>(i) A copy of the layout map must be submitted with the final report. All available biodiversity information must be used in the finalisation of the layout map. Existing infrastructure must be used as far as possible e.g. roads. The layout map of the proposed amendment must indicate the following:</p> <ul style="list-style-type: none"> • All preferred turbine positions must be clearly numbered. The turbine position numbers must be consistently used in all maps to be included in the final report. • All supporting onsite infrastructure e.g. roads (existing and proposed); • The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected; • Buffer areas; and • All "no-go" areas. <p>The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure.</p> <p>(ii) Google maps will not be accepted.</p> <p>Specialist assessments</p> <p>(i) Please ensure that the wake effect specialist study is included in the final reports.</p> <p>(ii) The EAP must provide confirmation that all specialists were provided with the same request of proposed amendments as well as ensure that the terms of reference for all the identified specialist studies include the following:</p>		<p>(i) Concerns and objections have been recorded in this CRR and adequately responded to, drawing on specialist reports as well as assessed impact ratings and mitigations.</p> <p>(ii) This CRR forms the comments trail, where all comments received have been recorded and responded to.</p> <p>Comments received on the Draft Amendment Report are attached as Appendix F5</p> <p>Comments received on the Revised Draft Amendment Report are attached as Appendix F8</p> <p>(iii) Proof of notification of availability of the Draft amendment report and the Revised Draft amendment report are attached as Appendix F4</p> <p>(iv) The draft Amendment Report was subjected to a public participation process of over 50 days and the revised draft Amendment Report was subjected to a public participation process of 30 days as detailed in chapter 6 of the Final Amendment Report.</p> <p>All maps have been attached to the Final Report as Appendix G and include biodiversity information.</p> <p>(i) As mentioned in the Draft Amendment Report and EMP, a Wake Effect Assessment will be undertaken by a mutually agreed third party accepted by ENGIE, MOYENG ENERGY and ENERTRAG once the final design phase is underway. This has been agreed to by Darling Wind Power- the wind farm that may be impacted by the potential wake effect.</p>

No.	Date	Comment	Initial Response	Technical response
		<p>(a) A detailed description of the study's methodology; indication of the locations and descriptions of the development footprint, and all other associated infrastructures that they have assessed and are recommending for authorisations.</p> <p>(b) Provide a detailed description of all limitations to the studies. All specialist studies must be conducted in the right season and providing that as a limitation will not be allowed.</p> <p>(c) Please note that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the 'no-go' areas.</p> <p>(d) Should the specialist definition of 'no-go' area differ from the Department's definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.</p> <p>(e) All specialist studies must be final, and provide detailed/practical mitigation measures and recommendations, and must not recommend further studies to be completed post EA.</p> <p>(f) Should specialists recommend specific mitigation measures for identified turbine positions, these must be clearly indicated.</p> <p>(g) Clearly defined cumulative impacts and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.</p> <p>(h) A detailed process flow to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.</p> <p>(i) Identified cumulative impacts associated with the proposed development must be rated with the significance rating methodology used in the process.</p> <p>(j) The significance rating must also inform the need and desirability of the proposed development.</p> <p>(k) A cumulative impact environmental statement on whether the proposed development must proceed.</p> <p>(i) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice.</p>		<p>(ii) All specialists were provided with the same terms of reference. All specialist reports are final and include the methodologies applied, description of limitations, any "no-go areas", impacts/ mitigations, cumulative impacts and recommendations.</p> <p>Recommendations exist for further studies as the final design phase is not yet complete and the EAP would like to make sure that all impacts are assessed.</p> <p>Cumulative impacts were assessed by specialists where possible and commented on in the Amendment Report.</p>
		<p>General</p> <p>Please ensure that all mitigation recommendations are in line with applicable and most recent guidelines. Should you fail to meet any of the timeframes stipulated in Regulation 32 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.</p>		<p>Noted, mitigation measures are in line with latest requirements.</p>

APPENDIX F9 BIRDLIFE MEETING MINUTES

Minutes of Meeting

Project	Part Two Environmental Authorisation Amendment for the Rheboksfontein Wind Energy Facility (WEF) in Western Cape, South Africa
Present	<p>ERM Amy Rawlins (AR) Simon van Wyk (SvW) Peter Wright (PW)</p> <p>BirdLife Sam Ralston (SR)</p> <p>Arcus Consulting Ashlin Bodasing (AB) Owen Davies (OD)</p>
Apologies	/
Distribution	All attendees
Date of Meeting	23 March 2021 10:00 SAST
ERM Reference	0554699



ITEM	DISCUSSION	ACTION
Welcome and Introductions	<ul style="list-style-type: none"> Participants were welcomed and introduced. 	
Meeting Objectives	<ul style="list-style-type: none"> AR provided a project overview. In summary: ERM wish to better understand BirdLife's comments (received 29 January 2021) in response to the submission of the Draft Amendment Report for public comment. The objective for the meeting is to meet and understand BirdLife's concerns and to find a way forward for the Project. 	
BirdLife's concerns	<ul style="list-style-type: none"> SR wanted to clarify that BirdLife opposes the Project's location. SR detailed the comments received. SR highlighted that in general, there is little confidence in the implementation of proposed mitigation measures described in Environmental Management Programme's (EMPr's) of South African Projects. This is made worse by poor policing by the authorities. Concerns relating to the Project at hand include the use of old data and the limited focus on black harriers. SR indicated that the EMPr needs proper focus with updated baseline data. SR asked if the client would be willing to utilise auto shut down technologies to reduce impacts. AR stated that the client was open to these measures and was open to both automated and human based shut down methods. 	

<p>Proposed Way Forward</p>	<ul style="list-style-type: none"> ■ Pre-Construction Bird Monitoring PW and AR highlighted the pre-construction monitoring to take place which will inform the final design and EMPr. This pre-construction monitoring should be in line with relevant guidelines including the Black Harriers and Wind Energy Guidelines for impact assessment, monitoring and mitigation (2020). ■ Final EMPr AB made note that the final EMPr will be submitted to the authorities for approval once the feasibility study has concluded. The final EMPr will include the proposed bird monitoring feedback and will be subjected to a public participation process. This will give BirdLife an opportunity to review the Final EMPr and provide feedback to inform the final layout of the WEF. 	<ul style="list-style-type: none"> ■ ERM to update Avifaunal study to included more detailed and firm mitigation measures. ■ ERM to include these in the EMPr. ■ ERM to highlight the pre-construction monitoring measures that should take place prior to the finalisation of the final
------------------------------------	--	---

The meeting adjourned at 10:30.